

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

Client Company name (Parent Company): Sime Darby Plantation Berhad
Client company Address: Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7 47301 Ara Damansara, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 1) – Sungai Dingin Palm Oil Mill Location of Certification Unit: Jalan Mahang-Kelang Lama, 09700 Karangan, Kedah, Malaysia

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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	07/09/2004
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 1) – Sungai Dingin Palm Oil Mill		
Location / Address	Strategic Operating Unit (SOU 1) – Sungai Dingin Palm Oil Mill, Jalan Mahang-Kelang Lama, 09700 Karangan, Kedah, Malaysia		
Website	www.simedarbyplantation.com		
Management Representative	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Subramaniam a/l Govindasamy (Mill Manager)	E-mail	shylaja.vasudevan@simedarbyplantation.com kks.sungai.dingin@simedarbyplantation.com
Telephone	+603 78484379 (Head Office) +603 5940178 (Mill)	Facsimile	+603 78484363 (Head Office) +603 5940167 (Mill)

2. Certification Information			
Certificate Number	RSPO 550179	Date of First Certification	12/08/2010
		Certificate Start Date	12/08/2020
		Certificate Expiry Date	11/08/2025
Scope of Certification	Palm oil and Palm Kernel Production		
Visit Objectives	The objective of the assessment was to conduct a recertification assessment of the existing certification to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by the organisation's management system.		
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 2018 for RSPO P&C 2018 with supply chain Module <input type="checkbox"/> Identity Preserved <input checked="" type="checkbox"/> Mass Balance		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 705584	MS 2530-4 Malaysia Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	14/02/2023

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MSPO 705628	MS 2530-3 Malaysia Sustainable Palm Oil (MSPO) Part 3		14/02/2023
MSPO 717859	MSPO Supply Chain Certification Standard: 2018		23/10/2024

4. Location(s) of Mill & Supply Bases

Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Sg Dingin Palm Oil Mill	Jalan Mahang-Kelang Lama, 09700 Karangan, Kedah, Malaysia	5° 23' 38.60"N	100° 42' 36.30" E
Sg Dingin Estate	Jalan Kulim-Mahang, Karangan, Kedah, Malaysia	5° 21' 05.22" N	100° 42' 09.32" E
Padang Buluh Estate	Jalan Sidam Kiri, Sungai Petani, Kedah, Malaysia	5° 34' 25.00" N	100° 34' 24.00" E
Bukit Selarong Estate	Jalan Ladang Bukit Selarong, Padang Serai, Kedah, Malaysia	5° 28' 21.25" N	100° 35' 30.55" E
Anak Kulim Estate	Jalan Kulim – Serdang, Kulim, Kedah, Malaysia	5° 18' 41.33" N	100° 36' 12.64" E
Bukit Hijau Estate	Jalan Kuala Tawar – Sedim, Kuala Ketil, Kedah, Malaysia	5° 33' 04.00" N	100° 45' 25.00" E
Jentayu Estate	K 17, Sungai Petani Kedah, Malaysia	5° 45' 59.83" N	100° 39' 49.21" E
Somme Estate	Jalan Terap – Serdang, Serdang, Kedah, Malaysia	5° 15' 12.00" N	100° 36' 14.00" E

5. Description of Supply Base

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Sg Dingin Estate	2,928.17	3.56	1,312.30	4,244.03	69.00
Padang Buluh Estate	3,447.00	14.34	547.13	4,008.47	85.99
Bukit Selarong Estate	3,669.04	34.24	222.29	3,925.57	93.47
Anak Kulim Estate	388.33	1.72	1,132.44	1,522.49	25.51
Bukit Hijau Estate	1,450.62	5.33	1,269.05	2,725.00	53.23
Jentayu Estate	1,191.04	0.71	986.84	2,178.59	54.67
Somme Estate	770.72	0	170.84	941.56	81.86
Total	13,844.89	59.9	5,640.89	19,545.71	70.83

Note:

1. Different hectareage for planted area for Sg. Dingin Estate due to land acquisition 7.64ha for project highway from Kampung Sg. Batu, Mukim Sg. Batu, Daerah Bandar Bharu to Kg. Sg. Pasir and Dublin Estate.

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2. Different hectareage for mature area in Bukit Hijau Estate since last assessment was due to conversion of planting from oil palm to Rubber at 326.28 ha.

6. Plantings & Cycle

Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Sg Dingin Estate	176.16	819.59	864.51	1,017.91	50.00	2,752.01	176.16
Padang Buluh Estate	586.00	684.00	1,671.00	506.00	0.00	2,861.00	586.00
Bukit Selarong Estate	342.56	699.27	513.75	2,113.46	0.00	3,326.48	342.56
Anak Kulim Estate	181.61	0.00	206.72	0.00	0.00	206.72	181.61
Bukit Hijau Estate	0.00	293.47	800.84	356.31	0.00	1,450.62	0.00
Jentayu Estate	612.26	145.91	432.87	0.00	0.00	578.78	612.26
Somme Estate	105.50	0.00	510.09	155.13	0.00	665.22	105.50
Total (ha)	2,004.09	2,642.24	5,162.92	4,311.95	50.00	11,840.8	2,004.09

Note:

Different hectareage for mature area in Bukit Hijau Estate since last assessment was due to conversion of planting from oil palm to Rubber at 326.28 ha.

7. Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage / year			
	Estimated (Aug 2019-July 2020)	Actual (Apr 2019 - Jul 2020)		Forecast (Aug 2020-July 2021)
		Previous license period (April 2019 - July 2019)	Current license period (Aug 2019-July 2020)	
Sg Dingin Estate	52,637.98	11,098.16	41,373.63	54,057.00
Padang Buluh Estate	72,100.00	12,355.45	45,825.96	67,000.00
Bukit Selarong Estate	71,218.00	11,594.46	43,428.59	69,066.00
Anak Kulim Estate	2,850.00	983.14	3,401.56	3,300.00
Bukit Hijau Estate	25,400.00	4,400.51	15,861.83	24,500.00
Jentayu Estate	20,003.00	4,036.55	14,770.40	24,507.00
Somme Estate	14,890.00	2,798.17	10,479.02	13,500.00
Total	259,100.34	222,407.43		255,930.00

Note:

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8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *				
Estate	Tonnage / year			
	Estimated (Aug 2019-July 2020)	Actual (Apr 2019 – Jul 2020)		Forecast (Aug 2020-July 2021)
		Previous license period (April 2019 – July 2019)	Current license period (Aug 2019-July 2020)	
Tali Ayer Estate		326.37		
Holyrood Estate		3,327.18	14,643.08	
Total		18,296.63		
Note:				

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable				
Independent FFB Supplier	Tonnage / year			
	Estimated (Aug 2019-July 2020)	Actual (Apr 2019 – Jul 2020)		Forecast (Aug 2020-July 2021)
		Previous license period (April 2019 – July 2019)	Current license period (Aug 2019-July 2020)	
Boleh Jadi	NA	525.93		NA
Ck Teik		2,9121.38		
Felcra BHD		3,431.806		
Genting		3,377.865		
KLK		81.72264		
Felcra Malau		8,220.41		
Tang Tatt		46,511.37		
Tentu Mewah		5,095.673		
Total		96,366.16		
Note:				

10. Certified Tonnage				
Mill Capacity: 80 MT/hr	Estimated (Aug 2019-July 2020)	Actual (Apr 2019 – Jul 2020)		Forecast (Aug 2020-July 2021)
	FFB	FFB		FFB
		Previous license period (Apr 2019 – Jul 2019)	Current license period (Aug 2019-Jul 2020)	
	259,098.00			255,930.00

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		50,919.99	189,784.07	
	CPO (OER: 22.00%)	CPO (OER: 21.06%)		CPO (OER: 21.78 %)
	57,001.56	10,723.75	39,968.53	55,741.55
	PK (KER: 5.38%)	PK (KER: 5.59%)		PK (KER: 5.80 %)
	13,939.47	2,820.97	10,514.04	14,843.94

Note:

11. Actual Sold Volume (CPO)

Current License period (August 2019-July 2020)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	320.06	0.00	0.00	35,775.94	36,096.00

Previous License period (April 2019 – July 2019)

CPO (MT)	0.00	0.00	0.00	9,331.80	9,331.80
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Note: The mill has sold 30,000 MT of CSPO as credit

12. Actual Sold Volume (PK)

Current License period (August 2019-July 2020)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	0.00	0.00	0.00	9,594.63	9,594.63

Previous License period (April 2019 – July 2019)

PK (MT)	0.00	0.00	0.00	2,635.71	2,635.71
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13. Actual Group certification Claims

	Credit	Physical Volume (MT)
IS-CSPO	0.00	0.00
IS-CSPKO	0.00	0.00
IS-CSPKE	0.00	0.00

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)
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2.1 Assessment Methodology, Programme, Site Visits

Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24/3/2020. The remote audit was conducted on 18/5/2020 -19/5/2020. The on-site assessment was conducted from 29/6/2020 -1/7/2020. 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.

On site Major NC verification was not able to be conducted due to Administrative Enhanced Movement Control Order in Kedah, Malaysia. Major NC verification was conducted via documentation review, photos, and interview. All the corrective action and evidence of implementation were found to be adequate. The Major NC closed on 28/9/2020.

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 Principles & Criteria 2018 (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.

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.

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As this is a recertification assessment, Public Notification has been done on 18/6/2020. 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 (RC2)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_4)	Year 6 (RC3)
Sungai Dingin Palm Oil Mill	X	X	X	X	X	X
Sungai Dingin Estate		X		X		
Padang Buluh Estate	X		X			X
Bukit Selarong Estate		X		X	X	
Anak Kulim Estate		X			X	
Bukit Hijau Estate	X			X		X
Jentatyu Estate			X		X	
Somme Estate	X		X			X

Tentative Date of Next Visit: June 1, 2021 - June 4, 2021

Total No. of Mandays: 12 Mandays

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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>
Muhammad Fadzli Masran	Trainee Lead Auditor	He holds Bachelor Degree in Forestry Science, graduated from University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. Fluent in Bahasa Malaysia and English Language. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and SCC for CPO mill
Hafriazhar Mohd Mokhtar	Team Member	He holds Bachelor Degree in Chemical Engineer. 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 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 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 and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands and Gabon. He is fluent in Bahasa Malaysia and English languages. During this assessment, he assessed on the aspects of legal, estates/mill best practices, safety and health, workers consultation and SCC for CPO mill.
Hu Ning Shing	Team Member	She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. She is fluent in Bahasa Malaysia and English languages. During this assessment, she assessed on the aspects of social, legal, workers & stakeholders consultation and SCC for CPO mill.
Vijay Kanna Pakirisamy	Team Member	He holds a bachelor's degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010. He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad. Throughout his 10 year tenure in the oil palm industry,

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		<p>he has been part of the operations team that implements standards within the estate such as RSPO, MSPO, ISCC and FINWATCH. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, endorsed RSPO P&C Lead Auditor Course in October 2019 and endorsed MSPO Lead Auditor Course in November 2019. During this assessment, he conducting the Major Non-Conformity Close-Out Assessment. He is fluent in Bahasa Malaysia and English languages.</p>
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Accompanying Persons:

Name	Role
-NA-	-NA-

2.3 Assessment Plan

Onsite audit

Date	Time	Subjects	MFM	HMM	HNS
Sunday 28/06/2020	PM	Audit Team Travelling	√	√	√
Monday 29/06/2020	08.30 – 9.00	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan 	√	√	√
Padang Buluh Estate	09.00 – 12.30	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. 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.)	√	√	√
	12.30 – 13.30	Lunch	√	√	√

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Somme Estate	13.30 – 17.00	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. 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.)	√	√	√
	17.00 - 17.30	Interim Closing briefing.	√	√	√
Tuesday 30/06/2020 Sg. Dingin POM	08.30 – 12.30	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√	√
	09.00 – 13.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)		√	
	12.30 – 13.30	Lunch	√	√	√
	13.30 – 16.30	Lab, weighbridge and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√
Wednesday 01/07/2020 Bukit Hijau Estate	09.00 – 12.30	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.	√	√	√
	12.30 – 13.30	Lunch	√	√	√
	13.30 – 16.30	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.)	√	√	√
	16.30 – 17.00	Preparation of audit report	√	√	√
	17.00 – 17.30	Closing Meeting	√	√	√

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Remote audit

Date	Time	Subjects	MFM	HMM	HNS	ICT Planned
Monday, 18/5/2020	9.30 – 10.00	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan 	√	√	√	Microsoft Teams, Email, WhatsApp Video call, Teleconference
	10.00 – 11.30	– Assessment and documentation review on: <ul style="list-style-type: none"> Good agriculture practice, legal requirements, environment and HCV 	√			Microsoft Teams, Email, WhatsApp Video call, Teleconference
	11.30 – 11.45	– 15 minutes break	√			
	11.45 – 13.00	– Assessment and documentation review on: <ul style="list-style-type: none"> Good agriculture practice, legal requirements, environment and HCV 	√			Microsoft Teams, Email, WhatsApp Video call, Teleconference
	13.00 – 13.45	– Lunch break	√			
	13.45 – 15.15	– Assessment and documentation review on: <ul style="list-style-type: none"> Mill best practice, legal requirements, OHS and continual improvement 		√		Microsoft Teams, Email, WhatsApp Video call, Teleconference
	15.15 – 15.30	– 15 minutes break		√		
	15.30 – 17.00	– Assessment and documentation review on: <ul style="list-style-type: none"> Mill best practice, legal requirements, OHS and continual improvement 		√		Microsoft Teams, Email, WhatsApp Video call, Teleconference
Tuesday, 19/5/2020	10.00 – 11.30	– Assessment and documentation review on: <ul style="list-style-type: none"> Social aspects, legal requirements, employees’ welfare and stakeholder management 			√	Microsoft Teams, Email, WhatsApp Video call, Teleconference
	11.30 – 11.45	– 15 minutes break			√	
	11.45 – 13.00	– Assessment and documentation review on: <ul style="list-style-type: none"> Social aspects, legal requirements, employees’ welfare and stakeholder management 			√	Microsoft Teams, Email, WhatsApp Video call, Teleconference
	13.00 – 13.45	– Lunch break			√	

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	13.45 15.00	– Assessment and documentation review on: <ul style="list-style-type: none"> • RSPO supply chain requirements 	√	√	√	Microsoft Teams, Email, WhatsApp Video call, Teleconference
	15.00 15.15	– 15 minutes break	√	√	√	
	15.15 16.00	– Assessment and documentation review on: <ul style="list-style-type: none"> • RSPO supply chain requirements 	√	√	√	Microsoft Teams, Email, WhatsApp Video call, Teleconference
	16.00 16.30	– Assessment team discussion	√	√	√	Microsoft Teams, Email, WhatsApp Video call, Teleconference
	16.30 17.00	– Closing Meeting	√	√	√	Microsoft Teams, Email, WhatsApp Video call, Teleconference

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Sime Darby Plantation 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. SDP TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table. As at 16/1/2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations	Complied
Have all the estates and mills certified within five years after obtaining RSPO membership?	Yes. All estates and mill has been certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 1/10/2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera was sold and currently SDP have no control in the management.	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.	No. There is no new acquisitions as at latest TBP 2020.	Complied
Have there been any changes to the time-bound plan since the last audit	Yes. Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT	Complied

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<p>(both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification.</p> <p>PT Mitral Austral Sejahtera: The properties was sold and currently SDP have no control in the management. The property was disposed on 25/6/ 2019 and an official letter on disposal of PT Mas was sent to RSPO Secretariat on 27/6/2019. Last meeting with all relevant stakeholders was done with RSPO CP during recent RT in Bangkok last November 2019.Both parties have responded to the legal reviewer report and submitted the comment to RSPO CP.</p> <p>Malaysia - Pekaka Mill is being mothballed (at the time of SDP Annual Report 2018) and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang. Bintang Oil Mill: SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, 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 1/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public notification letter: https://www.rspo.org/certification/public-announcement</p> <p>For Liberia operations: As at 16/1/2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</p> <p>ACOP 2018 has been cross-referenced as below: https://www.rspo.org/members/29/Sime-Darby-Plantation-Berhad</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 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 fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above.</p>	<p>Complied</p>
<p>Un-Certified Units or Holdings</p>		

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<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>HCV assessment has been conducted for uncertified units i.e. PT Mas (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>No new plantings. As at 16/1/2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</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.</p> <p><i>Note:</i> The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.</p>	<p>No stakeholder comments or complaints received.</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>None noted. No stakeholder comments or complaints received.</p>	<p>Complied</p>
<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>Yes. The sustainability unit has conducted the internal audit for 9 units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. Other than that, land conflicts and land disputes also being audited and approved by Head of Sustainability-Indonesia (Alagendran Maniam) on 22/05/2019. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>None noted. No stakeholder comments or complaints received.</p>	<p>Complied</p>

3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>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.</p>	<p>Not applicable as there is no smallholder scheme under Sungai Dingin Certification Unit.</p>	<p>NA</p>

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 two (2) Major; five (5) Minor nonconformities and two (2) Opportunity For Improvement raised. The SOU 1 Sungai Dingin POM and Supply Base 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.

Non-conformity			
NCR Ref #	1923219-202006-M1	Clause & Category (Major / Minor)	6.2.3 - Critical (Major)
Date Issued	1/7/2020	Due Date	30/9/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	28/9/2020
Statement of Nonconformity:	Sg. Dingin POM has yet to comply with the terms and conditions stated in the approval permit for allowing female workers to work from 10pm to 5am.		
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>The mill has obtained approval from Jabatan Tenaga Kerja Semenanjung Malaysia for allowing female workers to work from 10pm to 5am. Seen the approval letter with Ref. No.: BHG PU/9/135 Jld 14(18) dated 2/8/2018. There are terms and conditions that must be complied by the company and two of them are as below:</p> <p>iii. Provide the female workers a rest time from work for 11 hours continuously before entering to work.</p>		

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iv. Female workers that work on night shift must be given weekly rest day not less than 30 hours continuously.

However, sampled the female workers Daily Input Form and Punch Card for March 2020 and April 2020 found that the management did not comply with the terms and conditions above.

Employee No.:	Time In	Time Out	Time In	Remarks
26831				
March 20	7/3/20 15:47	8/3/20 8:00	9/3/20 07:41	8/3/20 is off-day. Less than 30 hours of continuous rest for a week.
	14/3/20 07:37	14/3/20 18:00	15/3/20 07:53	15/3/20 is off-day but work on rest day. Time out on 15/3/20 was 16:00. Less than 30 hours of continuous rest for a week.
April 20	4/4/20 15:50	5/4/20 07:00	6/4/20 07:37	5/4/20 is off-day. Less than 30 hours of continuous rest for a week.
	18/4/20 15:48	19/4/20 06:00	20/4/20 08:06	19/4/20 is off-day. Less than 30 hours of continuous rest for a week.
26878				
March 20	7/3/20 15:48	8/3/20 07:01	8/3/20 07:56	8/3/20 is off-day but work on rest day. Time out on 8/3/20 was 15:04. Less than 11 hours rest before entering work and less than 30 hours of continuous rest for a week.
	21/3/20 15:51	22/3/20 07:02	23/3/20 07:52	22/3/20 is off-day. Less than 30 hours of continuous rest for a week.
50752				
March 20	9/3/20 15:54	10/3/20 07:06	10/3/20 15:58	Not having 11 hours continuous rest before entering to work.
	14/3/20 15:54	15/3/20 07:00	16/3/20 07:58	15/3/20 is off-day. Less than 30 hours of continuous rest for a week.

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Corrections:	Mill will rearrange the shift working hour for the ladies to ensure comply with the requirement of rest hour
Root Cause Analysis:	During the MCO period mill facing shortage of Male manpower to operate the mill, hence few lady workers were put in shift
Corrective Actions:	<ol style="list-style-type: none"> 1. Mill will increase the intake of male workers for shift operation and relocate the female worker to the general duties on day shift 2. Mill will request for exemption from JTK under the term & condition given
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1. Sungai Dingin Mill has hired 5 new male workers to increase the workforce and minimize the lengthy hours and minimal that had been previously assigned to the female workers. Sighted the Master records with the job assigned to the 5 mentioned male workers. 2. The mill has produced a memo dated 1st September 2020 to all workers stating that the latest the night shift workers can work on Monday to Friday is at 5am, the latest a worker can work on Saturday is 2am and Sunday (Restday) work is not allowed. 3. Interview with the female workers indicated that they were now provided a rest time from work for 11 hours continuously before entering to work and those that work on night shift were given a weekly rest day not less than 30 hours continuously. 4. The mill has applied to JTK for exemption on the terms and conditions for female workers night work approval. Sighted the copy of the application letter dated 23rd August 2020. The application is pending approval. <p>Based on the above evidence, the major NC is closed effectively on 28.09.2020. Continuous implementation will be further verified in the next assessment.</p>

Non-conformity			
NCR Ref #	1923219-202006-M2	Clause & Category (Major / Minor)	6.7.3 - Critical (Major)
Date Issued	1/7/2020	Due Date	30/9/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	28/9/2020
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>Bukit Hijau Estate:</p> <p>During visit to Bukit Hijau Estate main division field block 2000C (R18) for spraying operation activity sampling, it was sighted that the sprayers were conducting</p>		

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	<p>spraying work without wearing goggle. Interview with sprayers revealed that they were provided with complete PPE for spraying including respirator, apron, rubber glove, rubber boot and helmet as well as clear goggle. Cross-checking with PPE issuance record also confirmed that the estate provided the sprayers with complete PPE as per Pictorial PPE Standard for spraying operation.</p> <p>However the workers complaint that the clear goggle issued would cause sighting hazard upon wearing since the goggle screen would be covered with precipitated mist especially during hot weather, hence they would rather not wearing them. The practice deemed unable to cover all potentially hazardous operations related to spraying activities.</p>
Corrections:	Estate Management to ensure all sprayer wearing a proper PPE as per recommendation and do the regular monitoring check before roll call on muster ground.
Root Cause Analysis:	Goggle provided by Estate Management to sprayers not suitable for spraying activity in field.
Corrective Actions:	Estate Management will discuss with RSQM Northern team and workers to identify the suitable goggle that will minimize the mist present during spraying activity.
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1. Bukit Hijau Estate have conducted an Improvement and Feedback meeting dated 03.09.2020 to discuss on the suitability of the goggles that have been provided to the sprayers for spraying operations. They also discussed on the possible use of face shield and anti-fogging glasses. Interview and trails were done by the SQM on workers using the 3 mentioned PPEs. A decision was made where it was concluded that the face shield was the most appropriate PPE to be used. The minutes of the meeting and PPE assessment was available for verification. 2. The Spraying SOP was revised dated August 2020 to replace the use of Eye Goggles to Face Shield as one of the compulsory PPE to be used during the operation. The revised SOP was available for verification. 3. HIRARC was revised on 03.09.2020 where the changes in eye protection (goggles to face shield) due to wearing goggles could lead to mist accumulated and cause a new hazard. CHRA was due to be updated on 09.10.2020 where the face shield is to be included. The revised HIRARC was available for verification. 4. All Sprayers were retrained on the revised SOP and HIRARC for spraying operations which included the updated changes in eye protection PPE. Training records dated 11.09.2020 was available for verification. 5. A PPE Inspection form was available where the supervisor inspects all required PPE (including the Face Shield) on a daily basis to ensure that all PPE stated in the SOP is worn by the sprayers prior to starting spraying work. <p>Based on the above evidence, the major NC is closed effectively on 28.09.2020. Continuous implementation will be further verified in the next assessment.</p>

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Non-conformity			
NCR Ref #	1923219-202006-N1	Clause & Category (Major / Minor)	4.2.3 - Non - Critical (Minor)
Date Issued	1/7/2020	Due Date	30/6/2021
Closed (Yes / No)	No	Date of nonconformity Closure	Open
Statement of Nonconformity:	Management of Somme Estate did not keep the complainant informed of the progress, including against agreed timeframe and the outcome of the complaint lodged.		
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:	Site visit to the sundry shop in Somme Estate and the owner has complaint that the zinc roof of the shop was broken, and the woods of the roof was ruptured by termites. He has lodged complaint during the stakeholder meeting conducted on 11/2/2020 and the management informed that will take action accordingly. The management has submitted the Non-essential items purchase approval on 12/6/2020 for top management approval. The top management disapproved and required for more quotation on 12/6/2020. However, the complainant has yet to inform on the progress since the complaint has lodged more than 4 months.		
Corrections:	To reply complaint from Sundry Shop officially and ensure they acknowledge the status of complained. To get several quotations from contractor to repair the zinc roof that are broken and submit the quotation to the top management for approval. Once approved, the estate will inform to the contractor for immediate repair .		
Root Cause Analysis:	Estate Management noticed the complaint from Sundry Shop highlighted during stakeholders meeting and action was in progress, however no official letter reply to stakeholders due to estate management not aware the procedure for external communication.		
Corrective Actions:	Estate management to monitor/follow up the request and keep update the progress to the complainant, Estate Management review complaint log book weekly basis and verify by Asst. Manager and to response/reply within 14 days as per SDP SOP. RSQM-NTR to conduct training regarding the procedure for internal/external communication .		
Assessment Conclusion:	The effectiveness of the implementation will be verified during next assessment.		

Non-conformity			
NCR Ref #	1923219-202006-N2	Clause & Category (Major / Minor)	7.3.1 - Non - Critical (Minor)
Date Issued	1/7/2020	Due Date	30/6/2021
Closed (Yes / No)	No	Date of nonconformity Closure	Open

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Statement of Nonconformity:	Waste management plan for EFB was not effectively implemented
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.
Objective Evidence:	Sighted during site visit at EFB dumping area, noted that the EFB was spilled over from the designated EFB dumping area. The leachate from the EFB flow on the ground into the estates field.
Corrections:	To minimize the EFB stock at yard by having each Estate to provide daily collection commitment and Mill highlight daily on the EFB collection with the SOU Estate for further action.
Root Cause Analysis:	Less collection from SOU estate due to Budget constrain couple with mill no longer operating the Composting Plant causing the EFB to piled up.
Corrective Actions:	To reconstruct the ground drain leading to the leachate pit to be pump to ETP Pond
Assessment Conclusion:	The effectiveness of the implementation will be verified during next assessment.

Non-conformity			
NCR Ref #	1923219-202006-N3	Clause & Category (Major / Minor)	7.3.2 - Non - Critical (Minor)
Date Issued	1/7/2020	Due Date	30/6/2021
Closed (Yes / No)	No	Date of nonconformity Closure	Open
Statement of Nonconformity:	The awareness of proper recycle waste material disposal is not effectively delivered to the workers.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<p>Padang Buluh Estate</p> <p>Sighted during site visit at housing area and landfill, there evidence of recycle waste such as plastic bottle were disposed together with the domestic waste. Sighted during site visit at the workshop, empty paint container were not handled as scheduled waste.</p> <p>Bukit Hijau Estate</p> <p>Sighted during site visit at landfill in field 2003B, there evidence of recycle waste such as plastic bottle were disposed together with the domestic waste.</p>		
Corrections:	<p>Padang Buluh Estate</p> <ol style="list-style-type: none"> All recycle waste should be discarded according with their type (plastic, glass, paper). To treat as schedule waste and disposed together with other SW accordingly by person in charge. 		

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	<p>Bukit Hijau Estate</p> <p>Estate management to give the awareness briefing regarding recycling benefits to them and for the environment. To inform and discuss with management team related Recycle Card to give and distributed to all workers</p>
Root Cause Analysis:	<p>Padang Buluh Estate</p> <ol style="list-style-type: none"> 1. Estate management was brief and promote program for waste recycling to all workers. However, effectiveness of training to workers not deliver the impact and not archive the objectives of Recycling Program. 2. Before that empty paint container was treat as Scheduled Waste, however low awareness from carpenter regarding Scheduled Waste management. <p>Bukit Hijau Estate</p> <p>Estate had informed to all workers to segregate their waste that can be recycled and to put in the recycle bin provided near to workers resident and to be collected/sale by recycle waste company. However, effectiveness of training to workers not deliver the impact and not archive the objectives of Recycling Program.</p>
Corrective Actions:	<p>Padang Buluh Estate</p> <ol style="list-style-type: none"> 1. To have permanent person in charge of recycle waste, to monitor and recording purposes. 2. To conduct Scheduled Waste training to all estate personal. <p>Bukit Hijau Estate</p> <p>Estate management to be establish organisation related recycle waste and ensure all workers to aware and concern about segregation recycling waste as a part of their daily routine.</p>
Assessment Conclusion:	The effectiveness of the implementation will be verified during next assessment.

Non-conformity			
NCR Ref #	1923219-202006-N4	Clause & Category (Major / Minor)	7.3.3 - Non - Critical (Minor)
Date Issued	1/7/2020	Due Date	30/6/2021
Closed (Yes / No)	No	Date of nonconformity Closure	Open
Statement of Nonconformity:	There evidence on use of fire for waste disposal.		
Requirement Reference:	The unit of certification does not use open fire for waste disposal.		
Objective Evidence:	Sighted during site visit at the landfill, there was evidence of open burning used for domestic waste disposal in the landfill.		
Corrections:	To put necessary signboard to ensure reminding of trespassing and open burning.		
Root Cause Analysis:	Landfill area located inside Padang Buluh Property with surrounding by Village. Possible by 'Orang Kampung' to trespassing and do open burning. Monitoring by		

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	AP was done, however monitoring only once a day and need to focus on peak hour monitoring.
Corrective Actions:	To have proper fencing & signboard surrounding landfill area to ensure no trespassing. To have regularly patrol by AP or workers appointed by the management to ensure no trespassing allowed.
Assessment Conclusion:	The effectiveness of the implementation will be verified during next assessment.

Non-conformity			
NCR Ref #	1923219-202006-N5	Clause & Category (Major / Minor)	6.7.2 - Non - Critical (Minor)
Date Issued	1/7/2020	Due Date	30/6/2021
Closed (Yes / No)	No	Date of nonconformity Closure	Open
Statement of Nonconformity:	First aid equipment available at worksite was contained with expired medicine.		
Requirement Reference:	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 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.		
Objective Evidence:	Bukit Hijau Estate: Visit to Bukit Hijau Estate workshop found that the first aid box kept in workshop containing external use medicine that was expired on 31/5/2020.		
Corrections:	Estate management to ensure the person in charge (medical assistant) to carry out the monthly check and monitoring all clinical material expiry date and to replace any items going to expiry. Ensure the monthly monitoring to be done accordingly without delay		
Root Cause Analysis:	Estate management delay the monthly check for the month of May 2020 resulted to expiry of one (1) medical item for external use has been expired on 31th may 2020.		
Corrective Actions:	Estate to ensure the monthly monitoring to be done accordingly without delay, All item expiry date to be display on notification board to reminded purpose (master list).		
Assessment Conclusion:	The effectiveness of the implementation will be verified during next assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	All Estates and POM: Stakeholder list could be further improved with updated contact, details and nominated representatives.

OFI 2	Minimum Wage Order 2020 was implemented on February 2020 by the government. The estates and mill's management were paid the wages of workers on February 2020 according to old Minimum Wage Order 2019. All the operating units received an email dated 22/6/2020 from Plantation IT related to arrears payment for wages on February 2020. According to the checkroll clerks, they will reimburse the balance of wages for February 2020 on June 2020's wages. This will be verified during next assessment.
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Positive Findings	
PF #	Description
PF 1	NA

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1767947-201904-N1	Clause & Category (Major / Minor)	5.1.2 - Non - Critical (Minor)
Closed (Yes / No)	Yes	Date of nonconformity Closure	1/7/2020
Statement of Nonconformity:	Environmental management plan was not effectively implemented		
Requirement Reference:	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons		
Objective Evidence:	Environmental management plan (EMP) FY 2019 dated 5/1/19 did not include: <ul style="list-style-type: none"> i) Significant environmental impacts - nuisance (noise pollution) as per Compliance Schedule no. 004543. ii) As to date, no boundary noise monitoring carried out as baseline monitoring. Basis use for the boundary noise is referred to noise mapping report in 2017. iii) Monsoon drain analysis - only 2 parameters tested (BOD and COD) compared to EMP (BOD, SS and COD). Refer to analysis report [IE1396/2018 dated 27/11/18, IE146/2019 dated 10/2/19 and IE319/2019 dated 19/3/19] 		
Root Cause Analysis:	<ul style="list-style-type: none"> i) Noise pollution was not include in the Environmental Management Plan due to mill during EAI and EIE evaluation the noise impact rating is low. Mill as well has overlook the compliance schedule on noise pollution. ii) Boundary Noise monitoring has been conducted by PROCOMA ENVIRONMENTAL (M) SDN BHD on 19 May 2017. However there is inaccuracy in selecting the point of monitoring by the consultant as the point of selection was found to be boundary between high noise stations at mill rather than between boundary of the mill parameters and external environment. iii) Mill did not clearly advice the R&D Lab on the analysis to be conducted for the Monsoon Drain sample. 		

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Corrective Actions:	<p>i) The comprehensive EAI & EIE assessment need to be carry out by the Mill and assist by the SQM-NTR. During the assessment, the assessor shall to identify the environmental aspects and impacts for all activities in mill operations, the next step is to identify the significant impacts. If the environmental aspect has a high potential of non-compliance to regulatory requirements, then it automatically has to be addressed under the EMP. The relevant training will be conducted to enhance the understanding.</p> <p>ii) Mill will follow as per DOE guideline in The Planning Guidelines For Environmental Noise Limits and Control by Noise Data Section, Air Division, Department of Environment Malaysia. Under title no.6 (6.1) Monitoring point(s) has stated that "Normally the noise assessment will be at the nearest noise sensitive premises and the best position for the monitoring point(s) will often be outside the sensitive premises at the real property boundary. This however does not mean that the monitoring point must always be close to the premises. Noise assessment at times may refer only to noise from the source under consideration and not to the total measured value which may include, for example, traffic noise." Therefore for point selection, mill will select 4 points at the mill property boundary which is between mill parameter fencing and outside environment. Mill personnel as well will ensure to verify the location of Noise Monitoring Device is at correct point position.</p> <p>iii) iii) All delivery note for monsoon drain analysis must clearly state the type of analysis to be conducted.</p>
Assessment Conclusion:	<p>Evidence reviewed:</p> <p>i) Boundary noise report has been conducted on 18 - 19/7/2019. Refer report no. L-PG-AC1907CSP_0568 dated 28/7/2019.</p> <p>ii) Environmental Aspect Identification and Environmental Impact Evaluation has been conducted on 2/3/2020. Please refer document no. EAI/2020/03/01/ESP/01</p> <p>iii) Latest Environmental Management Plan FY 2020 has been reviewed 18/1/2020 to include Noise Pollution.</p> <p>The evidences sighted found adequate and effectively implemented. Thus, the minor NC was effectively closed.</p>

Non-conformity			
NCR Ref #	1767947-201904-N2	Clause & Category (Major / Minor)	4.1.3 - Non - Critical (Minor)
Closed (Yes / No)	Yes	Date of nonconformity Closure	1/7/2020
Statement of Nonconformity:	Records of monitoring and any actions taken was not adequately maintained.		
Requirement Reference:	Records of monitoring and any actions taken shall be maintained and available, as appropriate.		
Objective Evidence:	At Padang Buluh Estate, water sample taken from 3 points (upstream, midstream and downstream of Sungai Jerong. Refer to analysis result, IE20/2019 dated 28/12/18. Noted a few parameters were off-limit (BOD, COD, DO and P*).		

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	Investigation was not recorded in CAPA and no retest carried out within 1 week after receipt of the report.
Root Cause Analysis:	The estate management did not aware on the re-sampling procedure for the off specification result.
Corrective Actions:	Estate will closely monitor the final report from R&D. the immediate action will be taken if the result shown the off spec and the investigation will taking place. To enhance the understanding of the water sampling procedure, the specific training will be arrange.
Assessment Conclusion:	Evidence verified i. River Water sampled analysis result no. IE1394/2019 dated 23/12/2019 were found not conform with class IIA/IIB of NWQS for natural waterways. ii. Investigation has been conducted on 26/12/2019 as per for WQ-01/CPAR(1) iii. Water sampling training has been conducted on 29/3/2020 by RSQM Executive. The evidences sighted found adequate and effectively implemented. Thus, the minor NC was effectively closed.

Non-conformity			
NCR Ref #	1767947-201904-N3	Clause & Category (Major / Minor)	5.6.3 - Non - Critical (Minor)
Closed (Yes / No)	Yes	Date of nonconformity Closure	1/7/2020
Statement of Nonconformity:	GHG calculation report was not in place.		
Requirement Reference:	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.		
Objective Evidence:	GHG calculation report for 2018 was not made available for verification.		
Root Cause Analysis:	GSQM was waiting for the updates from RSPO on development of new PalmGHG calculation version 4 to avoid doing double reporting using V3 and V4.		
Corrective Actions:	To assign person in charge for monitoring and update the data if necessary.		
Assessment Conclusion:	Evidence verified i. Communication email dated 10/5/2019 on appointment for person responsible for monitoring and updating the PalmGHG data. ii. Verified the data for PalmGHG Sungai Dingin POM and Supply Base for 2019. The evidences sighted found adequate and effectively implemented. Thus, the minor NC was effectively closed.		

Opportunity for Improvement	
OFI#	Description
OFI 1	NA

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1767947-201904-N1	Minor	5.1.2	26/4/2019	Closed on 1/7/2020
1767947-201904-N2	Minor	4.1.3	26/4/2019	Closed on 1/7/2020
1767947-201904-N3	Minor	5.6.3	26/4/2019	Closed on 1/7/2020
1923219-202006-M1	Major	6.2.3	1/7/2020	Closed on 28/9/2020
1923219-202006-M2	Major	6.7.3	1/7/2020	Closed on 28/9/2020
1923219-202006-N1	Minor	4.2.3	1/7/2020	Open. To be assess during next assessment
1923219-202006-N2	Minor	7.3.1	1/7/2020	Open. To be assess during next assessment
1923219-202006-N3	Minor	7.3.2	1/7/2020	Open. To be assess during next assessment
1923219-202006-N4	Minor	7.3.3	1/7/2020	Open. To be assess during next assessment
1923219-202006-N5	Minor	6.7.2	1/7/2020	Open. To be assess during next assessment

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 SOU 1 Sungai Dingin POM and Supply Base Certification Unit’s environmental and social performance, legal and any known dispute issues.

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	
Internal Stakeholders Gender Committee Representatives Foreign & local workers	Union/Contractors NUPW Representatives Chop Hup Heng
Government Departments SJK (T) Bernedact	NGO/Communities/Neighbourhood villages Kg. Dingin

Stakeholders comment	
1	Feedbacks: Workers' Representatives – They have informed that no salary deduction during the MCO period and wages was paid as per the regulations. They were provided with training on how to avoid the infection of Covid-19. They are aware and understand the complaint procedure and rights of them. There was no issue raised by the workers. They were treated equally without any discrimination of gender and nationality.
	Management Responses: The management will ensure the compliance of legal requirements.
	Audit Team Findings: No other issue.
2	Feedbacks: Local community representative – They informed that the operations in the estates and mill have not affected their daily life. They have good relationship with the management and the management will aid whenever they requested for help. Residents in the villages were given employment opportunity as well. There is no land dispute reported since last audit.
	Management Responses: The management will continue to maintain good relationship with the local communities.
	Audit Team Findings: No further issue.
3	Feedbacks: Sundry shop owner, Somme Estate – He has signed rental agreement with the management and no issue so far. He informed that he has lodged complaint related to the broken zinc roof and woods of the roof ruptured by termites on 11/2/2020 during stakeholder meeting. However, no action taken by the management.
	Management Responses: The management has submitted the budget for approval on 12/6/2020 but put on-hold by top management for further details required.
	Audit Team Findings: Refer to indicator 4.2.3.
4	Feedbacks:

	<p>Gender Committee Representatives – They are aware of their rights of reproductive. They were briefed on the new mother’s requirements for specific needs and consultation have been conducted by the management. They informed that those who handle chemical found pregnant will be transferred to other job stations that not hazard to the worker. They allow to go back for breastfeeding during working hour in case they need. They also informed that no case of sexual harassment and violence reported.</p> <p>Management Responses: The management will ensure that no pregnant female worker is handling chemical and hazardous work.</p> <p>Audit Team Findings: No other issue.</p>
5	<p>Feedbacks: School’s representative (SJKT Ladang Badenach) – He informed that the relationship between school and estate’s management is good. The management will be aided such as grass cutting whenever they requested. Maintenance in the school will be done by estate’s management if they requested. No complaint has been lodged.</p> <p>Management Responses: The management will continue to support and maintain good relationship.</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
N/A	N/A	N/A	N/A	N/A	N/A
Not applicable as Sime Darby acquired (freehold and leased) all the land directly from the state of Kedah State government.					

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

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. All team members has maintained the impartiality and no conflict of interest.

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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 SOU 1 Sg. Dingin POM and Supply Base has complied with the RSPO Principles & Criteria's 2018 (MYNI 2019) 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 SOU 1 Sg. Dingin POM and Supply Base is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Muhammad Fadzli Masran	Name: MOHD ROSLI B. MOHAMED SUHAIMI
Company Name: BSI Services (M) Sdn. Bhd.	Company Name: SIME DARBY PLANTATION BHD
Title: Client Manager	Title: ACT SR. MANAGER
Signature: 	Signature: <p>(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)</p> <p>SIME DARBY PLANTATION BHD. Company No: 647766-V LADANG SUNGAI DINGIN</p>  MOHD ROSLI BIN MOHAMED SUHAIMI ACTING SR. MANAGER
Date: 20/10/2020	Date: 26/10/2020

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 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.			
1.1.1	(C) Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance -	Publicly available management documents such as land titles, OHS plans, EIA and SIA reports, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans are available. All operating units have individual documents and records to demonstrate compliance to this indicator. Sustainability Reports, policies and procedures are also accessible through the company's website: http://www.simedarbyplantation.com/	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	All the related information was in Bahasa Malaysia and English and accessible to the stakeholders upon request.	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	All the estates and mill has maintained the DOSH visit logbook, internal & external complaint book and Communication logbook to record any requests and responses from the stakeholders. Sampled of the requests from stakeholders as below: i) One of the Headmaster of secondary school near Bukit Hijau Estate has requested formally to use the community hall for competition of badminton on 3/2/2020. The management has responded to the representative on 4/2/2020 to approve the usage of community hall.	Complied

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		<p>ii) The NUPW representative in Padang Buluh Estate has reported that no water supply in the housing area on 6/5/2020. The management reported to SADA immediately and lodged complaint via the E-Aduan SADA as well. The officer responded that main piping was broken.</p> <p>There was no request of information since last audit.</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 nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Estate Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 1, issue date 1/4/2008). The procedure has detailing the process of handling complaints from stakeholders and the time frame for external communication to be dealt with. The time frame to provide feedback is within two weeks of the date of receipt for communication and within one week of the completion of the investigation.</p> <p>The Managers and Senior Managers of the estates and mill has been appointed as the social officer to handle any issues related to social at the site. Appointment letters issued by the CEO of Northern Region dated 2/1/2020 were sighted.</p> <p>One of the methods of communication is through stakeholder meeting. Stakeholder meeting was conducted on 11/2/2020 in Padang Buluh Estate, 25/2/2020 in Bukit Hijau Estate, 11/2/2020 in Somme Estate and 11/3/2020 in Sungai Dingin Estate and Sungai Dingin POM. The meeting has involved the participation of various stakeholders such as contractors, government authorities, local communities and suppliers. The management of Padang Buluh Estate, Sungai Dingin Estate and Sungai Dingin POM has briefed the methods of communication to the stakeholders during the meeting. Issues reported during the meeting were recorded in the meeting minutes. The managements have taken action accordingly.</p>	<p>Complied</p>

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1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>Seen the stakeholder list for Padang Buluh Estate, Bukit Hijau Estate, Somme Estate and Sungai Dingin POM. The list has included the local communities, contractors, suppliers and government authorities.</p> <p>All Estates and POM: Stakeholder list could be further improved with updated contact, details and nominated representatives. #OFI</p>	OFI
<p>Criterion 1.2 The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has developed and implemented Code of Business Conduct (Aug 2018) where the company implemented the attitude of integrity, respect & responsibility, enterprise and excellence during any business process. The policy was developed in Bahasa Malaysia, English and Bahasa Indonesia which can be downloaded via http://www.simedarbyplantation.com/corporate/governance/ethics/business-practices. The policy has been briefed to the workers on 24/2/2020 during morning briefing in Sungai Dingin POM, 13/5/2020 in Padang Buluh Estate, 29/1/2020 in Bukit Hijau Estate and 25/2/2020 in Somme Estate. Besides, policies were briefed to other stakeholders during the stakeholder meeting. Seen the Induction Training for Contractors where briefing of the COBC was provided to the contractors in Sungin Dingin POM on 6/1/2020 and 7/1/2019 in Padang Buluh Estate. During the induction training for new employees, the briefing of the policy will also be provided.</p>	Complied
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has implemented Whistleblowing Policy to help all stakeholders raise concerns, without fear of retaliation on any wrongdoing that they may observe in Sime Darby Plantation Group. The channels of whistleblowing are such as E-form that</p>	Complied

		could be downloaded via http://www.simedarbyplantation.com/corporate/governance/whistleblowing , email, call, hotline or letter to the respective department. Besides, the company established Internal Audit to monitor the compliance and implementation of the policy throughout the plantations. Internal audit was carried out on 18/2/2020 in Sungai Dingin POM, 19/2/2020 in Bukit Hijau Estate, 20/2/2020 in Padang Buluh Estate and 21/2/2020 in Somme Estate.	
Principle 2: Operate legally and respect rights			
Criterion 2.1			
There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	<p>SOU 1 had continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and SQM sustainability team. SOU 8 had obtained and renewed license and permits as required by the law. Among others the licenses/permit viewed were:</p> <p>Padang Buluh Estate</p> <ol style="list-style-type: none"> 1. MPOB license 529234002000 valid until 30/4/2021. 2. License KPDNKK (SP)/002/2017 (SK) serial no. K002064 for Diesel valid until 24/7/2020 <p>Bukit Hijau Estate</p> <ol style="list-style-type: none"> 1. MPOB license 524461002000 valid until 31/10/2021. 2. License KPDNHEP.BLG (SK)/03/2012 for Diesel expired on 19/5/2020. Application for renewal has been done on 14/5/2020 as per email from BLESS System dated 14/5/2020. Refer BLESS application no. BL22020014461. 3. Air compressor permit no. KDPMT1261 valid until 7/6/2021 <p>Somme Estate</p>	Complied

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		<ol style="list-style-type: none"> 1. MPOB license 52466002000 valid until 30/10/2021. 2. License KPDNKK.KLM (P) 14/1999 serial no. K001061 for Diesel valid until 15/1/2021 3. Air compressor permit no. KDPMT902 valid until 15/4/2021 <p>Sg. Dingin POM</p> <ol style="list-style-type: none"> 1. MPOB license 530978004000 valid until 30/6/2021. 2. Air compressor permit no. KDPMT902 valid until 15/4/2021 3. Hoisting and lifting equipment permit no KDPMA4541 valid until 5/4/2021 4. Competent Person <ol style="list-style-type: none"> a. AESP for Confined Space <ul style="list-style-type: none"> - NW-NSBH-AE-0458-p valid till 13/3/2021 - NW-PNG-AE-R-0368-R valid till 19/2/2021 - NW-PNG-AE-R-0367-R valid till 19/2/2021 b. AGTES <ul style="list-style-type: none"> - NW-NSBH-AGT-0259-P valid till 3/7/2021 c. CePSWam – Cert no. CePSWam/00503 d. CePPOME – Cert no. CEPPOME/204508 <p>Sime Darby Plantation has obtained approval from Jabatan Tenaga Kerja Semenanjung Malaysia for the deduction of salary for electricity bill for all the estates and mills in Peninsular Malaysia. Seen the approval letter with Ref. No.: BHG.PU/9/129 JLD37 (53) dated 6/7/2017.</p> <p>Besides, Bukit Hijau Estate has obtained approval to make deduction on the salary for water bill and temple fund. Permit with Ref. No.: PTK/SP/PMT/10202/27023 dated 18/3/2019.</p>	
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		<p>Somme Estate has obtained approval to make deduction on the salary for the following:</p> <ul style="list-style-type: none"> a. Ref. No.: PMT/10203/2017/0082(4) dated 30/11/2017 for mosque fund b. Ref. No.: PMT/10203/2020 /0003(3), PMT/10203/2020 /0003(3) dated 10/2/2020 for electricity and water bill <p>Sg. Dingin has obtained approval to make deduction on the salary for the following:</p> <ul style="list-style-type: none"> a. Ref. No.: PMT/10203/2017/0025(7) dated 4/6/2017 for Insurance (GELA) b. Ref. No.: PMT/10203/2017/0033(3) dated 23/7/2017 for electric, water, NUPW & AMESU fees <p>Besides, Sg. Dingin POM has obtained approval from authority for overtime up to 130 hours. Approval letter with Ref. No.: BHG.PU/9/134 JLD9 (11) dated 27/3/2017. In additional, permit to allow female workers to work from 10pm to 5am was sighted and seen the permit with Ref. No.: BHG PU/9/135 Jld 14 (18) dated 2/8/2018.</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Mechanism to ensure compliance includes internal audit which was latest conducted on 20/2/2020 by internal auditors among northern region PSQM members led by Mohd Yusri Yusoff @ Saud, assisted by Hazrul Zulkifli and Fauzi. Records of internal audit report shown a total of 10 nonconformities raised by internal auditors have been closed by Padang Buluh Estate accordingly. Padang Buluh Estate 20/2/2020, Somme Estate 21/2/2020.</p> <p>Latest PA visit for Padang Buluh Estate was conducted on 15-18/6/2020. Final rating Padang Buluh Estate was 81. Previous PA visit was 25-28/10/2019.</p>	Complied

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2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Padang Buluh Estate visited field P11A & P13A boundary to Kampung Padang Buluh & Kampung Kubang Sapi pegging and trenches as marking.</p>	
<p>Criterion 2.2:</p>			
<p>All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements</p>			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>All OU in SOU 1 have listed and maintain all contracted parties and documented in List of Stakeholder as parts of their stakeholders includes internal such as employee and workers union and external stakeholders such as FFB suppliers, contractors, transporters and government department.</p>	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>- Minor compliance -</p>	<p>All OU in SOU 1 have listed and maintain all contracted parties and documented in List of Stakeholder as parts of their stakeholders includes internal such as employee and workers union and external stakeholders such as FFB suppliers, contractors, transporters and government department.</p> <p>All contracted parties/vendors were required to signed Vendor Integrity Pledge (VIP) and to comply with para</p> <ul style="list-style-type: none"> - a (i); Vendor Code of Business Conduct (VCOBC) - a (ii); all applicable laws and regulations related anti-bribery, fraud and corruption. <p>Sighted the sampled contracts as follows:</p> <p>Padang Buluh Estate</p> <ul style="list-style-type: none"> i. Devanica Enterprise – contract no. 4300501277 ii. Zaitunizam b. Mahmud Husin – contract no. 4300498283 	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>- Minor compliance -</p>	<p>Generic clause related to disallowing child, forced and trafficked labour written in Vendor Integrity Pledge (VIP).</p> <p>All contracted parties/vendors were required to signed Vendor Integrity Pledge (VIP) and to comply with para</p> <p>- a (i); Vendor Code of Business Conduct (VCOBC)</p> <p>- a (ii); all applicable laws and regulations related anti-bribery, fraud and corruption.</p>	Complied						
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>									
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 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 <p>- Critical (Major) compliance -</p>	<p>For directly sources FFB, as minimum a valid MPOB license is required for registration. Details of MPOB license summarized as per the following :</p> <table border="1" data-bbox="1099 831 1832 1043"> <thead> <tr> <th data-bbox="1099 831 1464 884">Estate/Out growers</th> <th data-bbox="1464 831 1832 884">Geo-location</th> </tr> </thead> <tbody> <tr> <td data-bbox="1099 884 1464 963">Genting Bukit Sembilan Estate</td> <td data-bbox="1464 884 1832 963">5.57566N, 100.68613E</td> </tr> <tr> <td data-bbox="1099 963 1464 1043">Tentumewah Sdn. Bhd</td> <td data-bbox="1464 963 1832 1043">5.66771N, 100.65233E</td> </tr> </tbody> </table>	Estate/Out growers	Geo-location	Genting Bukit Sembilan Estate	5.57566N, 100.68613E	Tentumewah Sdn. Bhd	5.66771N, 100.65233E	Complied
Estate/Out growers	Geo-location								
Genting Bukit Sembilan Estate	5.57566N, 100.68613E								
Tentumewah Sdn. Bhd	5.66771N, 100.65233E								
2.3.2	<p>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.</p> <p>- Minor compliance -</p>	<p>Evidence available for indirectly sourced FFB for sample External Supplier (Collection Centre Ramp) as follows:</p> <table border="1" data-bbox="1099 1174 1832 1377"> <thead> <tr> <th data-bbox="1099 1174 1464 1227">Estate/Out growers</th> <th data-bbox="1464 1174 1832 1227">Geo-location</th> </tr> </thead> <tbody> <tr> <td data-bbox="1099 1227 1464 1307">CK Teik Enterprise</td> <td data-bbox="1464 1227 1832 1307">5.39984N, 100.54784E</td> </tr> <tr> <td data-bbox="1099 1307 1464 1377">Tang Tatt Trading Sdn. Bhd.</td> <td data-bbox="1464 1307 1832 1377">5.25738N, 100.72246E</td> </tr> </tbody> </table>	Estate/Out growers	Geo-location	CK Teik Enterprise	5.39984N, 100.54784E	Tang Tatt Trading Sdn. Bhd.	5.25738N, 100.72246E	Complied
Estate/Out growers	Geo-location								
CK Teik Enterprise	5.39984N, 100.54784E								
Tang Tatt Trading Sdn. Bhd.	5.25738N, 100.72246E								

		The mill is in progress to obtain all the details from the FFB traders.	
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1			
There is an implemented management plan that aims to achieve long-term economic and financial viability.			
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>- Critical (Major) compliance -</p>	<p>Sungai Dingin mill and estates established their business management plan based on the needs and projection of operations with regards to production of FFB for estates and CPO and PK for mill. Respective operating unit’s business management plan sighted as following:</p> <ul style="list-style-type: none"> - Sungai Dingin Palm Oil Mill (Sg. Dingin POM): MPLAN_2020 forecast business plan for five financial years from FY 2020 until 2024; The plan covers the Mill Production (Mill Intake – Oil Palm, Production Crude Palm Oil, Production Palm Kernel, Total Palm Oil Extraction & Total Palm Kernel Extraction), Reception, Fruit Handling, Sterilization, Threshing, Pressing, Clarification, etc. - Padang Buluh Estate (Padang Buluh Estate), Bukit Hijau Estate (Bukit Hijau Estate) & Somme Estate (Somme Estate): MPLAN 2020 Forecast FY 2020 - 2024 (Ex-estate Cost – Excluding manuring, Admin Paid By HQ and Depreciation). The MPLan Forecast projects the Crop – Oil Palm, CPO, PK, OER, KER, YPH, Direct Cost and Fixed Cost for respective estates. <p>There’s no Scheme Smallholders involved within Sungai Dingin SOU 1 that requires jointly developed business case. However, Sime Darby Plantation as a group has developed a Responsible Sourcing Guidelines (RSG) in approaching third party FFB suppliers to ensure the fruits are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream department of HQ are responsible to source potential external suppliers.</p>	Complied

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3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	Based on Long Range Replanting Program for Padang Buloh Estate Main Division and Jerai Division FY2020-FY2024, total area for replanting in FY2020 is 79.00 ha involved field 1997A (54 ha) and 1998A (25 ha). Some Estate LRRP FY 2020 total 70 ha. Planned FY2021 63.25 ha.	Complied
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	Padang Buluh Estate latest management review meeting was conducted on 4/3/2020 involved Padang Buluh Estate main & Jerai Divison.	Complied
<p>Criterion 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>			
3.2.1	<p>(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. - Critical (Major) compliance -</p>	<p>Sg. Dingin POM has established continual improvement plan documented in the Social and Environment Action Plan. Sighted the sampled implementation of the improvement plan FY 2020 as follows:</p> <ul style="list-style-type: none"> • Energy Management Plan: Efficient Usage of Non-renewable (Diesel & TNB) & Renewable Energy (Boiler Turbine) • Pollution Prevention Plan: Mill (Reduce risks of POME discharge, black smoke emission & landfill contamination) & Workers housing area (Zero open burning) • Padang Buluh Estate, Bukit Hijau Estate & Somme Estate established their respective continual improvement plan amongst all as per samples as following: • Padang Buluh Estate Integrated Pest Management (IPM) MR-03/QSHEP; Date: 1/4/2020 – reduction of chemical usage • Padang Buluh Estate Waste Management Action Plan 2020 • Padang Buluh Estate Water Management Plan: Contingency Plan During Water Shortage for FY 2020 	Complied

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		<ul style="list-style-type: none"> • Bukit Hijau Estate IPM Plan FY 2020 • Somme Estate Biodiversity action plan FY 2020; Date: 2/1/2020 • Somme Estate Energy management plan 2019 & 2020 • Somme Estate Identification & Management of Wastewaters 2019 & 2020 • Somme Estate PPE matrix plan 2019 & 2020 • Somme Estate Pollution prevention plan 2019 & 2020 • Somme Estate Training needs & plan 2020 • Somme Estate Waste management action plan 2019 & 2020 • Somme Estate What to do plan 2019 & 2020 <p>In general, all operating units established its social improvement plan based on internal and external stakeholders' consultation as well as Sime Darby's own Human Rights Charter programs which amongst all involved Providing Equal Opportunities, Respecting Freedom of Association, Eradicating any form of Exploitation, Ensuring Favourable Working Conditions, Enhancing Safety and Health, Respecting Community Rights and the Rights of Indigenous People, Protecting the Rights of Vulnerable People, Protecting the Rights of Children and Eliminating Violence and Sexual Harassment.</p>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p>	<p>There's no submission made by Sime Darby of RSPO metrics template yet, pending its availability by RSPO secretariat. Latest submission of Annual Communications of Progress (ACOP) done for year 2018 available as in RSPO website link as following: https://www.rspo.org/view-acop-pdf/oil-palm-growers/Sime_Darby_Plantation_Berhad-ACOP2018.pdf.</p> <p>ACOP 2019 submission was still pending at the time of remote audit due to COVID 19 MCO as per deferment made by RSPO</p>	Complied

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	<p>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>- Minor Compliance -</p>	<p>Secretariat as in website link: https://www.rspo.org/news-and-events/covid-19/important-update-regarding-acop-2019.</p>	
<p>Criterion 3.3 Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>SOPs were available and sighted for both the Palm Oil Mill and the Estates.</p> <p>Sg. Dingin POM holds two SOPs as a guidance document to operate the mill.</p> <ul style="list-style-type: none"> - Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and - Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill. <p>Padang Buluh Estate, Bukit Hijau Estate and Somme Estate have a separate SOP (Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual) covers land preparation, planting material, upkeep, harvesting, transport etc.</p>	Complied
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place..</p> <p>- Minor Compliance -</p>	<p>Quality Assurance, Quality Management Unit (PSQM) inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements.</p>	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>All operating units maintained and made available relevant records of monitoring as per samples reviewed as following:</p> <p>Sg. Dingin POM :</p>	Complied

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		<ul style="list-style-type: none"> - Mill report # SOU 1/SDM /02/2019; Plantation Advisory Department; Visit date: 12-13/12/2019 <p>Padang Buluh Estate:</p> <ul style="list-style-type: none"> - PA Report visit 25-28/9/2020 - PSQM visit 20-21/1/2020 – Estate structured crop recovery assessment report SOU 1 Sg. Dingin - MSPO & RSPO Internal Audit Report for Padang Buloh Estate; 20/2/2020 <p>Bukit Hijau Estate:</p> <ul style="list-style-type: none"> - Operational RSQM Performance Assessment Kalumba Div. Score: 76; Date: 4/3/2020, Operational RSQM Performance Assessment Patani Para Div. Score: 81; Date: 26/11/2019, Operational RSQM Performance Assessment Main Div. Score: 77; Date: 14/10/2019 <p>Somme Estate:</p> <ul style="list-style-type: none"> Internal audit report for Somme Estate; 21/2/2020 	
<p>Criterion 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.</p>			
3.4.1	<p>(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/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p><u>Environmental Impact Assessment</u></p> <p>There is no new planting in SOU 1. The estates and mill conducted Environmental Impact Assessment to identify the environmental aspect in all estate activities and documented in Environmental Aspects Impacts Identification form and Environmental Impacts Evaluation form. The assessment covers all activities in the estates and mill. The assessment was conducted base on SOP established. Refer SOP Standard Operation Manual; subsection 5.4; Planning</p>	Complied

		<p>and Appendix 5.4.1b: Environmental aspect/impacts evaluation procedure.</p> <p>Social Impact Assessment</p> <p>Sg. Dingin POM and the supplying estates (Sg. Dingin Estate, Padang Buluh Estate, Somme Estate and Bukit Hijau Estate) have carried out Social Impact Assessment (SIA) on 23/2 – 5/3/2015 by Sustainability Strategy Unit, PSQM Department. The methodology of the assessment was through field interview with workers, government authorities and local communities, site observation and documentation review. Feedbacks from the stakeholders were recorded in the assessment report. Social profile such as social background of employees, background of local community, education, safety & health, living condition, stakeholder engagement and infrastructure and amenities.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Environmental Impact Assessment</p> <p>The assessment was conducted base on Standard Operation Manual; subsection 5.4; Planning and Appendix 5.4.1b: Environmental aspect/impacts evaluation procedure. In the SOP stated the POM and Estates carried out the annual review of environmental impacts documented in Registration of Environmental Aspects and Impacts.</p> <p>Padang Buluh Estate</p> <p>Review was conducted by the PIC, the Asst. Manager as appointed by the Manager as per letter dated 1/1/2020 and approved by the Manager. Latest review was conducted on 6/1/2020 with no changes on the assessment conducted.</p> <p>Bukit Hijau Estate</p>	Complied

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		<p>Latest review was conducted on 5/1/2020 by the Asst. Manager and approved by the Manager with no changes on made to the EAI and EIE since last review was conducted.</p> <p>Somme Estate</p> <p>Latest review was conducted on 6/2/2020 by the PIC appointed, HA and approved by the Manager with no changes on made to the EAI and EIE since last review was conducted.</p> <p><u>Social Impact Assessment</u></p> <p>Padang Buluh Estate, Somme Estate, Sg. Dingin POM and Bukit Hijau Estate has developed Management Plan on Social Impact Assessment FY2020 dated 1/6/2020, 21/3/2020 & 3/2/2020, 15/5/2020, 25/3/2020 respectively by the Assistant Managers. Covid-19 aspect has been included into the management plan. Sampled the areas of concern as below:</p> <ul style="list-style-type: none"> a) SK Harvard and SJKT Harvard 2 has requested the Padang Buluh Estate’s management to carry out grass cutting at the school’s field. Seen the Tractor Daily Utilization Record found that grass cutting was conducted on 19/6/2020. b) SK Terap has requested to trim the coconut tree in the school’s field. Seen the photo evident that the request has been fulfilled. 	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The management plan established base on operation with significant impact to the environment. The management plan was reviewed annually. The management plan stated the environmental issue, mitigation actions, monitoring plan and person responsible for monitoring implementation.</p> <p>The operating units sampled have established the Environmental Management Program base on the significant impacts identified in the EAI/EIE conducted. The plan stated the Environmental issue,</p>	Complied

		<p>mitigating measures and person responsible. The plan was reviewed on annually basis. The plan was monitored on quarterly basis.</p> <p><u>Social Impact Assessment</u></p> <p>The management plan will be reviewed on yearly basis and the last reviewed was conducted on 1/6/2020 in Padang Buluh Estate, 21/3/2020 & 3/2/2020 in Somme Estate, 15/5/2020 in Sg. Dingin POM and 25/3/2020 in Bukit Hijau Estate.</p>	
<p>Criterion 3.5 A system for managing human resources is in place.</p>			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>The Human Resource Department in HQ has established Hiring of Local Workers procedure (Doc. No.: 01-12-19) and Workforce Management Unit Liaison & Recruitment procedure (WMU/LR-SOPP/MARCH2016, Rev. 0 dated 30/3/2016) to explain the recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried out by the HQ through appointed agents in respective countries.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Padang Buluh Estate has displayed job vacancy banner and informed the existing workers during morning muster when there is any vacancy. There was a local recruitment on 6/1/2020. Seen the application form and other relevant documents such as identification card, medical record and offer letter. The last recruitment of foreign workers was on 23/12/2019 and induction training was provided.</p> <p>Interviewed with the Assistant in Sg. Dingin POM where they will normally displayed job vacancy banner in the entrance of POM, informed to the head of villages and workers when where there is any job vacancy. Seen the banner for vacancy of Production Operator and the successful applicant was recruited on 16/6/2020.</p>	Complied

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		Application form, medical check-up record, photocopied of identification card and offer letter was maintained in the personal file.	
Criterion 3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	SOU 1 operation units assessed the risks and identified H&S issues through the implementation of HIRARC as per Sime Darby Plantations HIRARC PROCEDURE Ref. # 5.4.1a; Issue date: 25/5/2015. Risks assessments were based on likelihood and severity matrix for all operations. Records shown there were incidences occurred in Sg. Dingin POM , Somme Estate and Bukit Hijau Estate involved mill general work, vehicle maintenance work and estate field operation work respectively. HIRARC review were done on 10/8/2019 for the general work in mill with incident occurrence while Somme Estate reviewed its vehicle maintenance work in workshop HIRARC on 28/7/2019. Review also done for Bukit Hijau Estate HIRARC Cutting & Stacking Fronds operation with incident occurrence. Mitigation plans were documented as Exiting Control and Recommended Risk Control in the HIRARC register. Other specific OSH plans were also available as reviewed for following samples: Padang Buluh Estate: - Environment Safety & Health Program Padang Buluh/Jerai Estate FY 2020 - HIRARC Form; date review: 29/4/2020 – specific to COVID 19 (exposure to contagious & infectious diseases from environment & people) Somme Estate: - Environment, Safety & Health Program Somme Estate FY 2019	Complied

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		Occupational Safety & Health Management Plan 2020	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Major Compliance -</p>	The effectiveness of the HIRARC is monitored and ensured through checklist and trainings that were conducted by Sungai Dingin POM and its estate in each of the operations. Site visits around the mill and estate indicated the control measures of the HIRARC were followed and ensured by the respective management.	Complied
<p>Criterion 3.7 All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>Operating units within SOU 1 conducted training needs analysis for all its operational employees to determine relevant training required. Upon determination, a training plan was established to schedule the training to be conducted whole year. Sighted the records of following samples:</p> <p>Sg. Dingin POM :</p> <ul style="list-style-type: none"> - Annual training plan 2019/2020 - Training effectiveness assessment records <p>Padang Buluh Estate:</p> <ul style="list-style-type: none"> - Training Matrix Padang Buloh Estate – FY 2020 - Executives/staff/workers training needs and plan for FY 2020 15/5/2020 – include pre-training status & post-training competency level assessment <p>Bukit Hijau Estate:</p> <ul style="list-style-type: none"> - Training plan & matrix; 5/1/2020 - Executives/staff/workers training needs and plan for FY 2020 prepared 3/1/2020, approved 5/1/2020 <p>Somme Estate:</p> <ul style="list-style-type: none"> - Training needs & plans 2019-2020 	Complied

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		<p>There's no Scheme Smallholders involved within Sungai Dingin SOU 1 that accessible for training programs. However, Sime Darby Plantation as a group has developed a Responsible Sourcing Guidelines (RSG) in approaching third party FFB suppliers for awareness on the needs to ensure sustainable fruits are sourced from identified, legal and responsible sources.</p>	
<p>3.7.2</p>	<p>Records of training are maintained. - Minor Compliance -</p>	<p>All planned training activities implemented either as a whole SOU 1 group or by individual operating units were maintained its records as per samples sighted as following:</p> <ul style="list-style-type: none"> - SOU 1 New RSPO P&C 2018 Requirements Training SOU1; 17-21/2/2020 - SOU 1 HRDs Human Rights briefing; 13/3/2020 - Sg. Dingin POM First Aid training; 5/9/2019 - Padang Buluh Estate Chemical emergency training (sprayers @ mixing area); 19/11/2019 - Padang Buluh Estate Emergency drill training (nursery workers); 14/11/2019 - Padang Buluh Estate Fertilizer application training (nursery workers); 22/2/2020 - Bukit Hijau Estate First aid drill training (mandores & workers); 19/11/2019 - Bukit Hijau Estate Refresher training – sickles (harvesters); 7/3/2020 - Somme Estate Safety & PPE training (sprayers – circle); 22/2/2020 - Somme Estate Integrated Pest Management (IPM) and Barn Owl Box (BOB) training; 29/2/2020 	<p>Complied</p>

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3.7.3	<p>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.</p> <p>- Minor Compliance -</p>	<p>The mill continuously provided training to all the personnel involve in the SCCS by Managers, Assistants Managers and SQM Executives with knowledge on the SCCS.</p> <p>The training was conducted regularly on internal training and centrally by SOU basis.</p>	Complied
<p>Criterion 3.8 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)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>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 process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>As per SOP established and documented in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under Glossary section define the meaning of RSPO Identity preserved as supply chain model assured that the RSPO certified oil palm product delivered to the end user uniquely identifiable ta a single RSPO certified supply base.</p> <p>As the Sg. Dingin POM is using Model E, Mass Balance, the criteria is non-applicable.</p>	Complied
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p>	<p>As per SOP established and documented in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under Glossary section define the meaning of RSPO Mass Balance as supply chain model that allows certified claim to be transferred from one palm oil products to another through physical blending or administratively under strictly control circumstances.</p>	Complied

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3.8.3	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 summary of the P&C certification 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.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim). Seen the Member ID: RSPO_PO1000000104 and license valid until 11/8/2020. Total 13 sales of certified product (CSPO and CSPK) were recorded from April 2019 to April 2020, sampled the transaction ID as below: <ul style="list-style-type: none"> i. TR-2ba1b5ad-fb63 dated 7/10/2019; 39.92 MT (CSPO) ii. TR-5fd3d1f6-b521 dated 13/5/2019; 500 MT (CSPK) 	Complied
3.8.5	Documented procedures The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: <ul style="list-style-type: none"> a. Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c. 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 mill's procedures for the 	Procedure for supply chain has been established and documented in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019. Among the subjects covered in the procedure are: <ul style="list-style-type: none"> i. Introduction ii. Objectives iii. Scope iv. Responsibilities v. Control of documents and records vi. Delivery of FFB from estate 	Complied

	<p>implementation of this standard.</p> <p>d. The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<ul style="list-style-type: none"> vii. Receiving FFB at the mill viii. Process monitoring ix. Products dispatch x. Non-conforming products and/or documents xi. Products claims xii. Outsourced contractors xiii. Training xiv. Reclassification of mill's supply chain model xv. Production volume xvi. Conversion factors xvii. Internal audit xviii. Complaints xix. Management review <p>The Mill Manager holds the hold the responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements as stated in the Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 4.0 Responsibilities.</p>	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i. The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements 	<p>Addressed in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 18.0 Internal Audit. Based on the procedure, the internal audit is to be conducted annually as per Internal Audit Procedure. Refer SOP ref. no. SD/SDP/PSQM/IAP.</p>	Complied

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	<p>within its organisation.</p> <p>ii. 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 mill shall maintain the internal audit records and reports.</p>	<p>Combined internal audit for supply chain was last conducted on 18/2/2020 by 2 internal auditors from Group Sustainability and Quality Management Department. No non-conformity for RSPO SCCS was raised during the internal audit.</p> <p>The results of Internal Audit were discussed in the Management Review Meeting as sighted in minutes meeting conducted on 13/4/2020.</p>	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii. The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii. The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>Addressed in the Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 6.0 delivery FFB from Estate.</p> <p>Similar to last assessment daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and uncertified FFB. Records verified by internal and external audit.</p> <p>Sg. Dingin mill have system to verify at the weighbridge. Information for RSPO certified FFB were recorded in FFB Consignment notes and weighbridge tickets. Records verified during the audit as follow:</p> <p>Sighted the sampled delivery off FFB as follows:</p> <p>i. Tang Tatt Trading Sdn. Bhd Date: 20/3/2020 C/N no.: T46463 RSPO Cert. no.: Non-Certified W. Ticket no.: 226593 Net Weight: 20730 kg</p>	<p>Complied</p>

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		<p>ii. CK Teik Ent Date: 4/3/2020 C/N no.: 41324 RSPO Cert. no.: Non-Certified W. Ticket no.: 225449 Net Weight: 19170 kg</p> <p>iii. Somme Estate Date: 3/4/2020 C/N no.: 8811 RSPO Cert. no.: RSPO 550179 W. Ticket no.: 225475 Net Weight: 12040 kg</p> <p>iv. Bukit Hijau Estate Date: 20/3/2020 C/N no.: 15335 RSPO Cert. no.: RSPO 550179 W. Ticket no.: 226623 Net Weight: 11260 kg</p>	
<p>3.8.8</p>	<p>Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p>	<p>Sampled of the sales and goods out delivery records as below: CSPO</p> <ul style="list-style-type: none"> a. The name and address of the buyer: SDO Biodiesel – Sime Darby Oils Biodiesel Sdn Bhd b. The name and address of the seller: Sungai Dingin POM 	<p>Complied</p>

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	<ul style="list-style-type: none"> a. The name and address of the buyer; b. The name and address of the seller; c. The loading or shipment / delivery date; d. The date on which the documents were issued; e. RSPO certificate number; f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g. The quantity of the products delivered; h. Any related transport documentation; i. A unique identification number. 	<ul style="list-style-type: none"> c. The loading or shipment / delivery date: 25/9/2019 d. The date on which the documents were issued: 25/9/2019 e. RSPO certificate number: SPO 550179 f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Mass Balance g. The quantity of the products delivered: 39,920 kg h. Any related transport documentation: Weighbridge Ticket# 022774 i. A unique identification number: Contract Ref.: S/PSD/1909/CPO0562 <p>CSPK</p> <ul style="list-style-type: none"> a. The name and address of the buyer: SDP KCP- Sime Darby Plantation Berhad b. The name and address of the seller: Sungai Dingin POM c. The loading or shipment / delivery date: 3/5/2019 d. The date on which the documents were issued: 3/5/2019 j. RSPO certificate number: SPO 550179 e. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): RSPO PK-MB f. The quantity of the products delivered: 44,540 kg g. Any related transport documentation: Weighbridge Ticket# 021610 h. A unique identification number: Contract Ref.: S/C-PSD/1903/PK0137 	
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		The RSPO certificate number has been rectified from SPO 550179 to RSPO 550179 on 13/3/2020.	
3.8.9	<p>Outsourcing Activities</p> <p>i. The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii. The mill shall ensure the following:</p> <p>a. The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b. The mill 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 mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c. The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d. The mill 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 all information, when this is announced in advance.</p>	<p>Sime Darby has established Standard Operating procedure for outsourced activities as per Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019, Section 13.0: Outsourced Contractors.</p> <p>In the SOP under section 13.1 stated that CPO Mill cannot outsourced processing activities like refining or crushing.</p> <p>The list of outsourced contractor was sighted, "list of stakeholder as at January 2020" include the transport contractor for CPO and PK Mayang Bayumas Sdn. Bhd.</p> <p>Sighted the sampled contracts between The Sime Darby Plantation Bhd. with Mayang Bayumas Sdn. Bhd dated 19/12/2017 and extension email for contract extension dated 1/5/2019.</p>	Complied
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Stated in the contract agreement between The Sime Darby Plantation Bhd. with Mayang Bayumas Sdn. Bhd dated 19/12/2017, mentioned the site has legal ownership of all input	Complied

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		<p>material to be included in outsourced processes as per Annexure 5, RSPO Supply Chain Certification Standard.</p> <p>The mill ensures that an outsourced activity (transportation) is not contaminated with non-certified materials as per agreement. There is no outsourced process within Sg. Dingin Palm Oil Mill, hence this requirement is not applicable.</p>	
3.8.11	<p>The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.</p>	<p>Sime Darby has issued Memorandum to all contractors dated 26/6/2019. In the memorandum stated the contractors have to comply as follows;</p> <ul style="list-style-type: none"> i) Comply with local legal requirements ii) Attend the RSPO/ISCC/MSPO/SCCS briefing or training organized by the company iii) Having signed and enforceable agreement with the company iv) Provide access to the auditors to contractors' operation site(s) and employees whenever deemed necessary v) Having related working permits vi) Ensure PPE utilization by contractors' employee while being in the company premise. 	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> i. The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii. Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii. For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO 	<ul style="list-style-type: none"> i) Sime Darby has established Standard Operating Procedure to maintain all records of evidence on the implementation of MSPO SCCS. The SOP was documented in Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019 under section 5.0: Control of Documents and Records. ii) As stated in SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019 under section 5.0: Control of Documents and Records all traceability records should be maintained at minimum period of 3 years. 	Complied

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	<p>and PK on a real-time basis.</p> <p>iv. For Mass Balance Module, the mill:</p> <p>a. 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.</p> <p>b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>iii) Sg. Dingin POM receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module.</p> <p>iv) a. Sg. Dingin POM has established the SCCS Mass balance sheet (3.8.7) document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>b. All volumes of certified CPO and PK that were delivered were deducted from the material accounting system according to conversion ratios of OER and KER as per sample records of Mill production report May 2019 – Apr 2020 (3.8.2) and FFB summary May 2019 – Apr 2020 (3.8.7)</p> <p>c. Positive stock deliveries maintained through the SCCS Mass balance sheet (3.8.7) document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. No short selling made by Sg. Dingin POM .</p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Extraction rates were derived from actual production output that were measured daily by the mill and recorded in the daily production report. Actual rates for the period since last audit were available in the Mill production report May 2019 – Apr 2020 (3.8.2). Volume estimates for next period were based on historical extractions and FFB projection from estates.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Extraction rates updated daily based on actual measurement of production output. Projected rates were based on historical extractions and FFB projection from estates.</p>	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil</p>	<p>Not applicable since Sg. Dingin POM receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module.</p>	Complied

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	palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.		
3.8.16	<p>Registration of Transactions</p> <ul style="list-style-type: none"> i. Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii. Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform. 	<p>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> <p>Based on the announcement (transaction) summary, all the registrations were found to be in order.</p>	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Sg. Dingin POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. 	Not applicable as no off-product claim made by Sg. Dingin POM as to date.	Not applicable

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	Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable as no off-product claim made by Sg. Dingin POM as to date.	Not applicable
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable as no off-product claim made by Sg. Dingin POM as to date.	Not applicable
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Sg. Dingin POM as verified through documentations and websites.	Not applicable
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of Supply chain elements. In the weighbridge ticket, it stated that i.e product/commodity with SCC model (CPO/Palm Kernel RSPO MB) and RSPO certificate number; RSPO 550179.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware	Sg. Dingin POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Not applicable

	<p>that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	There is no business to consumer communication as this is an upstream activity certification.	Not applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	There is no business to consumer communication as this is an upstream activity certification.	Not applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	There is no business to consumer communication as this is an upstream activity certification.	Not applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	Not applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	Not applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	There is no business to consumer communication as this is an upstream activity certification.	Not applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	There is no business to consumer communication as this is an upstream activity certification.	Complied

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6.8	<p>RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>	<p>There is no business to consumer communication as this is an upstream activity certification.</p>	<p>Not applicable</p>
<p>MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES (delete if not applicable)</p>			
<p>Certified oil palm content (IP)</p>			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>RSPO Trademark was not in use. The facility produces 100% RSPO MB CSPO and CSPK.</p>	<p>Not applicable</p>
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>RSPO Trademark was not in use. The facility produces 100% RSPO MB CSPO and CSPK.</p>	<p>Not applicable</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>		

Labelling and trademark (IP)		
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ol style="list-style-type: none"> RSPO trademark which includes the tag 'CERTIFIED' or RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	<p>RSPO Trademark was not in use. The facility produces 100% RSPO MB CSPO and CSPK.</p> <p>Not applicable</p>
Messaging (IP)		
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	<p>RSPO Trademark was not in use. The facility produces 100% RSPO MB CSPO and CSPK.</p> <p>Not applicable</p>
MODULE B – MASS BALANCE SPECIFIC RULES (delete if not applicable)		

Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	RSPO Trademark was not in use. The facility produces 100% RSPO MB CSPO and CSPK.	Not applicable
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	RSPO Trademark was not in use. The facility produces 100% RSPO MB CSPO and CSPK.	Not applicable
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	RSPO Trademark was not in use. The facility produces 100% RSPO MB CSPO and CSPK.	Complied

Messaging (MB)		
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. • In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed. <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>RSPO Trademark was not in use. The facility produces 100% RSPO MB CSPO and CSPK.</p> <p style="text-align: right;">Complied</p>
Principle 4: Respect community and human rights and deliver benefits		
Criterion 4.1		
The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.		
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, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has established Group Sustainability & Quality Policy Statement dated 2/12/2019 by Group Managing Director where the company is respecting, upholding & no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC). Besides, Policy on the Protection of Human Rights Defenders (HRDs) was established with effective date on 25/3/2020. Sime Darby Plantation respect and safeguard human rights, notion of democracy and its institution. They recognize that Human Rights</p> <p style="text-align: right;">Complied</p>

		Defenders have the role and responsibility of upholding human rights and the need for them to be able to lodge complaints that may arise from their business activities and relationship with SDP. This Policy is applied to all stakeholders affected by the business activities and relationships including directors, employees, counterparties, and business partners, workers in our operations and supply chains, and communities surrounding our operations. The policies were communicated to stakeholders during stakeholder meetings. Besides, the briefing of the policies was conducted on 25/2/2020 in Somme Estate, 13/5/2020 in Padang Buluh Estate, 23/2/2020 in Sungai Dingin POM and 13/5/2020 in Bukit Hijau Estate.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	Sime Darby Plantation prohibits any form of harassment in their operation as per the policies above. Interviewed with the workers confirmed that no harassment by the management.	Complied
Criterion 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. - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they believe everyone has the responsibility to promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognise the important role Human Rights Defenders, whistleblowers, complainants and community spokespersons play by lodging complaints in confidence.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 1/4/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented	Complied

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		<p>Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in http://www.simedarbyplantation.com/corporate/governance/whistleblowing. Besides, the managements have briefed the stakeholders during stakeholder meetings on the procedure of complaint.</p>	
<p>4.2.3</p>	<p>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> <p>- Minor compliance -</p>	<p>Somme Estate has implemented Records of Communication for Workers and Contractors logbook to record any complaints and grievances. Sampled of the complaint as below:</p> <p>One of the worker complaints that the septic tank was blocked on 15/11/2019. The management has acted to rectify immediately, and complainant has acknowledged on the action taken.</p> <p>Site visit to the sundry shop in Somme Estate and the owner has complaint that the zinc roof of the shop was broken, and the woods of the roof was ruptured by termites. He has lodged complaint during the stakeholder meeting conducted on 11/2/2020 and the management informed that will take action accordingly. The management has submitted the Non-essential items purchase approval on 12/6/2020 for top management approval. The top management disapproved and required for more quotation on 12/6/2020. However, the complainant has yet to inform on the progress since the complaint has lodged more than 4 months.</p> <p>Thus, a minor non-conformance was raised.</p> <p>Padang Buluh Estate implemented Housing Defects Report to record any related issues. Seen the complaint lodged on 13/1/2020, House No.: 64b that the lamp in the living room was malfunction. Action was taken by the management on 30/1/2020 and the complainant has acknowledged on 31/1/2020 and satisfied the action taken by the management.</p> <p>Bukit Hijau Estate has implemented Internal & External Complaint logbook. One of the complaints from House No.: C-12, D-4, C-5, D-</p>	<p>Minor Non-Compliance</p>

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		<p>11, D-12, B-10, D-08, A-18 and D-7 on 30/12/2019 related to water tap was broken. Seen the Communication/ Request & Grievance Form (PKSJ-001) where the management has acted to repair the broken water tap on 3/1/2020. All the complainants had acknowledged after the complaints have been resolved by the management.</p> <p>Sungai Dingin POM has implemented Complaint Book to record any complaints from internal and external stakeholders. One of the complaints is related to long grasses in the labour quarter reported on 25/4/2020. The management has appointed contractor to carry out grass cutting activity. Seen the Contract Form Doc. No.: 4300503346 dated 18/5/2020. The grass cutting activity was conducted on 7/5/2020 and Auxiliary Police has conducted verification on site.</p>	
<p>4.2.4</p>	<p>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.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 1/4/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in http://www.simedarbyplantation.com/corporate/governance/whistleblowing. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p>	<p>Complied</p>
<p>Criterion 4.3</p>			

The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Padang Buluh Estate, Sg. Dingin POM and Bukit Hijau Estate's management has made contribution to the local communities such as given permission to the schools for the cross-country activity, supplied black soil to the clinic, borrow the AMPH system for mosque's activity and helping the local communities whenever they requested. This has been verified with the local community representative and school's representative that they have good relationship with the management.</p> <p>Besides, all the estates and mill's management also given free rice, phone allowance and festival allowance to all the workers.</p>	Complied
<p>Criterion 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.</p>			
4.4.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 1 estates were able to demonstrate the evidence of legal ownership if its lands through possession of land titles. The estates have a list of all its land titles which have the information about names of lease, hectare, terms & conditions, lease period and grant numbers. Copies of the land titles were available at the estate's offices while the original were kept at headquarter.</p> <p>Sample of land titles sighted as following:</p> <ul style="list-style-type: none"> - Sg. Dingin POM : Grant # 57873; Lot # 332; District: Kulim; Mukim: Sedim; Area: 2,638 ac; Registered date: 22/2/1972 - Padang Buluh Estate: Grant # 13375; Lot # 2386; District: Kuala Muda; Mukim: Sidam Kiri; Area: 72.69 ha; Registered date: 19/8/2002 - Bukit Hijau Estate: Grant # 3903; Lot # 376; District: Baling; Mukim: Tawar; Area: 6.4769 ha; Registered date: 6/8/2002 	Complied

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		<ul style="list-style-type: none"> - Somme Estate: Grant # 32631; Lot # 63; District: Bandar Bahru; Mukim: Serdang; Area: 1,358 ac; Registered date: 2/10/1926 <p>HMM</p> <p>Padang Buloh Estate holds a total of 15 land titles with 10 titles under Main Division and 5 titles under Jerai Division. Samples of titles sighted as following:</p> <ul style="list-style-type: none"> - Main division: Title # 1399; District: Kuala Muda; Sub-district: Sidam Kiri; Lot # 1374; Area: 1.4312 ha - Main division: Title # 791; District: Kuala Muda; Sub-district: Sidam Kiri; Lot # 3; Area: 1.7744 ha - Main division: Title # 13379; District: Kuala Muda; Sub-district: Sidam Kiri; Lot # 2392; Area: 901.3 ha - Jerai division: Title # 63927; District: Kuala Muda; Sub-district: Gurun; Lot # PT 5688; Area: 181.415 ha - Jerai division: Title # 175684; District: Kuala Muda; Sub-district: Gurun; Lot # 4551 Section 7; Area: 136.1 ha <p>Padang Buluh Estate received "Notice That Land is Likely to Be Acquired" from the Land and Mines Director, Kedah; Notice ref. # PTG/KED/L/AM/10/2019 (03B) dated 02/02/2020 for the "Proposed Land Acquisition for the purpose of development of proposed Kulim Airport, Sidam Logistics, Aerospace & Manufacturing (SLAM) Hub". The proposed acquisition will likely involve whole Main Division of Padang Buluh Estate until further notice date.</p> <p>Somme Estate holds a total of 124 land titles as per samples sighted as following:</p>	
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		<ul style="list-style-type: none"> - Main division: Title # 45032; District: Bandar Bahru; Sub-district: Serdang; Lot # 925; Area: 2.9735 ha - Main division: Title # 46669; District: Bandar Bahru; Sub-district: Serdang; Lot # 754; Area: 3.1443 ha - Main division: Title # 47408; District: Bandar Bahru; Sub-district: Serdang; Lot # 844; Area: 3.3488 ha <p>Bukit Hijau Estate holds a total of 35 land titles as per samples sighted as following:</p> <ul style="list-style-type: none"> - Main division: Title # 1855; District: Baling; Sub-district: Tawar; Lot # 2360; Area: 13.2282 ha - Patani Para division: Title # 35380; District: Kuala Muda; Sub-district: Sg. Petani; Lot # 132; Area: 53.2844 ha - Katumba division: Title # 1957; District: Baling; Sub-district: Kupang; Lot # 8432; Area: 508.8578 ha 	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is no land dispute recorded. This was verified through stakeholders' consultation.	Complied
4.4.2a	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. - Minor compliance -	In case of any 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
4.4.2b	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.	Complied

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	- Minor compliance -	In case of any arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	
4.4.2c	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. - Minor compliance -	There is no land dispute recorded. This was verified through stakeholders' consultation. In case of any 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
4.4.3	(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). - Critical (Major) compliance -	Maps available as per sighted Location of Sime Darby Estates in Northern Region (Kedah) maps and individual estates' field maps as well as boundary maps. Initial remote assessment reveal that there is no land dispute recorded. In case of any, dispute handling will be based on the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	There is no land dispute recorded. This was verified through stakeholders' consultation. In case of any 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. - Critical (Major) compliance -	There is no land dispute recorded. This was verified through stakeholders' consultation. In case of any 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

4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>In case of any arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</p>	Complied
<p>Criterion 4.5: 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.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>There was no new planting in SOU 1 Sg Dingin operating units during the time of audit.</p>	Complied
4.5.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>There was no new planting in SOU 1 Sg Dingin operating units during the time of audit.</p>	Complied
4.5.3	<p>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.</p> <p>- Minor compliance -</p>	<p>There was no new planting in SOU 1 Sg Dingin operating units during the time of audit.</p>	Complied

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. - Minor compliance -	There was no new planting in SOU 1 Sg Dingin operating units during the time of audit.	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. - Minor compliance -	There was no new planting in SOU 1 Sg Dingin operating units during the time of audit.	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. - Minor compliance -	There was no new planting in SOU 1 Sg Dingin operating units during the time of audit.	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. - Minor compliance -	There was no new planting in SOU 1 Sg Dingin operating units during the time of audit.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There was no new lands area inhabited by communities acquired in SOU 1 Sg Dingin operating units during the time of audit.	Complied

Criterion 4.6

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.

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4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 and issue date: 1/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p>	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair 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.</p> <p>- Critical (Major) compliance -</p>	<p>SOP as per indicator 4.6.1.</p> <p>Besides, the company has implemented Social Policy dated January 2015 where they are committed to ensure that any negotiations concerning compensation for loss of legal or customary 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.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.6.4	<p>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.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
<p>Criterion 4.7</p> <p>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.</p>			

4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 and issue date: 1/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p>	Complied
4.7.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>SOP as per indicator 4.7.1.</p> <p>Besides, the company has implemented Social Policy dated January 2015 where they are committed to ensure that any negotiations concerning compensation for loss of legal or customary 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.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>There was no community that have lost access and rights to land for plantation expansion as the operating units expands the planting area under certified area.</p>	Complied
<p>Criterion 4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>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.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied

4.8.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.8.3	<p>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 rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
<p>Principle 5: Support smallholder inclusion</p>			
<p>Criterion 5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>Current and previous FFB prices available as per MPOB Daily FFB Reference Price Summary by Region (RM/Tonne); May 2020; Northern Region; Grade A (OER 20%). No smallholders supplying to SDPOM except for few out growers and traders including Tang Tatt, Tentu Mewah Sdn. Bhd., KD Felcra Malau and CK Teik Enterprise Sdn. Bhd.</p>	Complied

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5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Explanation made normally through meeting e.g. Meeting with smallholders and suppliers of Sungai Dingin Palm Oil Mill, latest conducted on 11/3/2020.	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Fair pricing calculated based on Northern Region FFB Grade A (OER 20%) awarded to suppliers including smallholders as specified in individual agreements of FFB supply with the mill.	Complied
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 reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	Evidence available via documented information of meeting minutes e.g. Meeting with smallholders and suppliers of Sungai Dingin Palm Oil Mill, latest conducted on 11/3/2020.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Contracts for FFB out growers and traders are fair, legal and transparent and have an agreed timeframe as per sample sighted as following: - Agreement # P/P/0119/FFB01426L; Supplier: Felcra Berhad; Period: 1/1/2019 -31/12/2019 - Agreement # P/P/0119/FFB01334L; Supplier: Tang Tatt Trading Sdn. Bhd.; Period: 1/1/2019 -31/12/2019	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Payment made within 30 days upon receipt of supplier's invoice and confirmation of the quantity of FFB delivered to the mill. Payment was made through the financial department at head office.	Complied
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).	SDPOM weighbridge was verified as per sighted records of latest calibration by Metrology Corporation Malaysia Sdn. Bhd. calibration Borang D (Timbang dan Sukat) Perakuan Penentuan Timbang Dan	Complied

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	- Minor compliance -	Sukat; Akta Timbang Dan Sukat 1972; Perakuan # B 1464305; Weighbridge Serial # B522989603; Calibration date: 25/4/2019; Weighbridge capacity: 60,000kg; Brand: Mettler Toledo IND246.	
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. - Minor compliance -	Sime Darby Plantation as a group has 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. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers. As of current, no scheme smallholders program managed by Sime Darby Sungai Dingin POM. Information of Sime Darby Plantation RSG programs available via website link http://www.simedarbyplantation.com/sustainability/programmes/supply-chain-sustainability/working-suppliers .	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. - Critical (Major) compliance -	No any grievance received from external FFB suppliers since the last audit. In case of any SDPOM handled the process as per Standard Operation Manual; Date: 1/11/2008 that documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2) for grievance handling.	Complied
Criterion 5.2			
The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, 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. - Minor compliance -	Consultation made normally through meeting e.g. Meeting with stakeholders and FFB suppliers of Sungai Dingin Palm Oil Mill, latest conducted on 11/3/2020.	Complied
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial	Sime Darby Plantation as a group has developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified,	Complied

	<p>competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).</p> <p>- Minor compliance -</p>	<p>legal and responsible sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p>	
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation as a group has 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. 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
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation as a group has 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. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As of current, no scheme smallholders program managed by Sime Darby Sungai Dingin POM. Information of Sime Darby Plantation RSG programs available via website link http://www.simedarbyplantation.com/sustainability/programmes/supply-chain-sustainability/working-suppliers.</p>	Complied
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation as a group has 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. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p>	Complied

		As of current, no group smallholders program managed by Sime Darby Sungai Dingin POM. Information of Sime Darby Plantation RSG programs available via website link http://www.simedarbyplantation.com/sustainability/programmes/supply-chain-sustainability/working-suppliers .	
Principle 6: Respect workers' rights and conditions			
Criterion 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. - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They promote diversity and inclusion and will not condone discrimination. The policy has been briefed to all the employees and stakeholders. The policy could be downloaded from http://www.simedarbyplantation.com/sustainability/human-rights-charter .	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. - Critical (Major) compliance -	Interviewed with the workers comprises of different gender and nationalities confirmed that no discrimination has occurred in the plantations. The management treated all equally such as provided free accommodation and medical to all the workers, no charging of recruitment fees for the foreign workers and offered job based on capability.	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. - Minor compliance -	Sime Darby Plantation has developed a Career Progression for Workers Level (both local and foreign workers), Doc. No.: SDP/HRUM/2020/SOP01 where the promotion of workers is based on the work performance, suitability and the leadership quality of the worker. The recruitment of foreign workers is through Human	Complied

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		Resource Department in HQ based the regulation requirements. For local workers, the operating units will be announced to all the workers regarding the vacancy during morning muster and they as the medium to advertise the job vacancy to their family and friends. Medical test will be required for all the workers prior to start work.	
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. - Minor compliance -	Pregnancy testing is not conducted in the estates. However, the female workers have been informed to report to the management if pregnant. Female workers that handle chemical will be transferred to other work stations if found pregnant to reduce the risk of safety and health.	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. - Critical (Major) compliance -	Gender Committee was established in all the operating units. Seen the appointment letters of Chairman and committee members in Bukit Hijau Estate, Somme Estate and Sungai Dingin POM. Gender Committee has organized meeting quarterly. The last two meetings were conducted on 19/12/2019 and 10/3/2020 in Padang Buluh Estate, 21/2/2020 in Bukit Hijau Estate, 4/4/2020 and 13/1/2020 in Somme Estate and 4/2/2020 in Sungai Dingin POM. There was no issue raised in the meeting. Awareness of health and safety was raised during the meeting to all the committee members. Besides, activities to improve the skills of the female were organized such as cooking skills. Anak Kulim Estate and Somme Estate's Gender Committee has organized a training on Reproductivity Right and Human Right on 26/2/2020. Seen the attendance list of the training conducted. Interviewed with the female workers confirmed that the management has provided opportunities to female workers on career such as promotion of female workers as mandore.	Complied
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Sampled the payslip for March and April 2020 as below: a. Employee No.: 108742 (Bukit Hijau Estate)	OFI

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		<ul style="list-style-type: none"> b. Employee No.: 140263 (Bukit Hijau Estate) c. Employee No.: 25677 (Bukit Hijau Estate) d. Employee No.: 25675 (Bukit Hijau Estate) e. Employee No.: 27524 (Somme Estate) f. Employee No.: 27525 (Somme Estate) g. Employee No.: 156316 (Somme Estate) h. Employee No.: 149348 (Somme Estate) i. Employee No.: 79765 (Somme Estate) j. Employee No.: 85670 (Padang Buluh Estate) k. Employee No.: 152903 (Padang Buluh Estate) l. Employee No.: 58966 (Padang Buluh Estate) m. Employee No.: 151705 (Padang Buluh Estate) n. Employee No.: 156634 (Padang Buluh Estate) o. Employee No.: 26785 (Sungai Dining POM) p. Employee No.: 26786 (Sungai Dining POM) q. Employee No.: 91298 (Sungai Dining POM) r. Employee No.: 127734 (Sungai Dining POM) <p>All the workers are paid according to the Minimum Wage Order 2020.</p> <p>Minimum Wage Order 2020 was implemented on February 2020 by the government. The estates and mill's management were paid the wages of workers on February 2020 according to old Minimum Wage Order 2019. All the operating units received an email dated 22/6/2020 from Plantation IT related to arrears payment for wages on February 2020. According to the checkroll clerks, they will reimburse the balance of wages for February 2020 on June 2020's wages. This will be verified during next assessment. (OFI)</p>	
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Criterion 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).			
6.2.1	<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>- Critical (Major) compliance -</p>	<p>Employment contract are available and explained in language that understood by workers. The contract was signed by the workers and sampled of contracts as below:</p> <ul style="list-style-type: none"> a. Employee No.: 108742 (Bukit Hijau Estate) b. Employee No.: 140263 (Bukit Hijau Estate) c. Employee No.: 25677 (Bukit Hijau Estate) d. Employee No.: 25675 (Bukit Hijau Estate) e. Employee No.: 27524 (Somme Estate) f. Employee No.: 27525 (Somme Estate) g. Employee No.: 156316 (Somme Estate) h. Employee No.: 149348 (Somme Estate) i. Employee No.: 79765 (Somme Estate) j. Employee No.: 85670 (Padang Buluh Estate) k. Employee No.: 152903 (Padang Buluh Estate) l. Employee No.: 58966 (Padang Buluh Estate) m. Employee No.: 151705 (Padang Buluh Estate) n. Employee No.: 156634 (Padang Buluh Estate) o. Employee No.: 26785 (Sungai Dining POM) p. Employee No.: 26786 (Sungai Dining POM) q. Employee No.: 91298 (Sungai Dining POM) r. Employee No.: 127734 (Sungai Dining POM) 	Complied

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		<p>All the new workers were provided with induction training prior commencement of work. Sampled the induction training records conducted on 23/12/2019 for total 6 workers and 29/1/2020 for the last batch of recruitment on 27/1/2020 for total 8 workers in Bukit Hijau Estate.</p> <p>Since MCO is announced by the Malaysia’s government, MAPA has issued Movement Control Order (MCO) circular related to the wages of workers. Seen the circulars with Ref. No.: MAPA Circular No. 21/2020 dated 25/3/2020 and MAPA Circular No.: 30/2020 dated 24/4/2020 where the company must pay minimum 24 days wages even if they could not provide 24 days’ work to the workers if they are willing and fit to work.</p>	
<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. - Critical (Major) compliance -</p>	<p>Employment contract are available and found that the terms and conditions are outlined in the contract. The contract was signed by the workers and sampled of contracts as below:</p> <ul style="list-style-type: none"> a) Employee No.: 108742 (Bukit Hijau Estate) b) Employee No.: 140263 (Bukit Hijau Estate) c) Employee No.: 25677 (Bukit Hijau Estate) d) Employee No.: 25675 (Bukit Hijau Estate) e) Employee No.: 27524 (Somme Estate) f) Employee No.: 27525 (Somme Estate) g) Employee No.: 156316 (Somme Estate) h) Employee No.: 149348 (Somme Estate) i) Employee No.: 79765 (Somme Estate) j) Employee No.: 85670 (Padang Buluh Estate) k) Employee No.: 152903 (Padang Buluh Estate) l) Employee No.: 58966 (Padang Buluh Estate) 	<p>Complied</p>

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		<p>m) Employee No.: 151705 (Padang Buluh Estate) n) Employee No.: 156634 (Padang Buluh Estate) o) Employee No.: 26785 (Sungai Dining POM) p) Employee No.: 26786 (Sungai Dining POM) q) Employee No.: 91298 (Sungai Dining POM) r) Employee No.: 127734 (Sungai Dining POM)</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. - Critical (Major) compliance -</p>	<p>Sime Darby Plantation has obtained approval from Jabatan Tenaga Kerja Semenanjung Malaysia for the deduction of salary for electricity bill for all the estates and mills in Peninsular Malaysia. Seen the approval letter with Ref. No.: BHG.PU/9/129 JLD37(53) dated 6/7/2017.</p> <p>Besides, Bukit Hijau Estate has obtained approval to make deduction on the salary for water bill and temple fund. Permit with Ref. No.: PTK/SP/PMT/10202/27023 dated 18/3/2019.</p> <p>Somme Estate has obtained approval to make deduction on the salary for the following:</p> <ul style="list-style-type: none"> a. Ref. No.: PMT/10203/2017/0082(4) dated 30/11/2017 for mosque fund b. Ref. No.: PMT/10203/2020 /0003(3), PMT/10203/2020 /0003(3) dated 10/2/2020 for electricity and water bill <p>Verified the payslips found that deduction was made accordingly. Sg. Dingin POM:</p> <p>The mill has obtained approval from Jabatan Tenaga Kerja Semenanjung Malaysia for allowing female workers to work from 10pm to 5am. Seen the approval letter with Ref. No.: BHG PU/9/135 Jld 14(18) dated 2/8/2018. There are terms and conditions that must be comply by the company and two of them are as below:</p>	<p>Major non-compliance</p>

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		<p>iii. Provide the female workers a rest time from work for 11 hours continuously before entering to work.</p> <p>iv. Female workers that work on night shift must given weekly rest day not less than 30 hours continuously.</p> <p>However, sampled the female workers Daily Input Form and Punch Card for March 2020 and April 2020 found that the management did not comply with the terms and conditions above.</p> <table border="1"> <thead> <tr> <th>Employee No.:</th> <th>Time In</th> <th>Time Out</th> <th>Time In</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td colspan="5">26831</td> </tr> <tr> <td rowspan="2">March 20</td> <td>7/3/20 15:47</td> <td>8/3/20 8:00</td> <td>9/3/20 07:41</td> <td>8/3/20 is off-day. Less than 30 hours of continuous rest for a week.</td> </tr> <tr> <td>14/3/20 07:37</td> <td>14/3/20 18:00</td> <td>15/3/20 07:53</td> <td>15/3/20 is off-day but work on rest day. Time out on 15/3/20 was 16:00. Less than 30 hours of continuous rest for a week.</td> </tr> <tr> <td>April 20</td> <td>4/4/20 15:50</td> <td>5/4/20 07:00</td> <td>6/4/20 07:37</td> <td>5/4/20 is off-day. Less than 30 hours of continuous rest for a week.</td> </tr> </tbody> </table>	Employee No.:	Time In	Time Out	Time In	Remarks	26831					March 20	7/3/20 15:47	8/3/20 8:00	9/3/20 07:41	8/3/20 is off-day. Less than 30 hours of continuous rest for a week.	14/3/20 07:37	14/3/20 18:00	15/3/20 07:53	15/3/20 is off-day but work on rest day. Time out on 15/3/20 was 16:00. Less than 30 hours of continuous rest for a week.	April 20	4/4/20 15:50	5/4/20 07:00	6/4/20 07:37	5/4/20 is off-day. Less than 30 hours of continuous rest for a week.	
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		18/4/20 15:48	19/4/20 06:00	20/4/20 08:06	19/4/20 is off-day. Less than 30 hours of continuous rest for a week.
26878					
March 20	7/3/20 15:48	8/3/20 07:01	8/3/20 07:56	8/3/20 is off-day but work on rest day. Time out on 8/3/20 was 15:04. Less than 11 hours rest before entering work and less than 30 hours of continuous rest for a week.	
	21/3/20 15:51	22/3/20 07:02	23/3/20 07:52	22/3/20 is off-day. Less than 30 hours of continuous rest for a week.	
50752					
March 20	9/3/20 15:54	10/3/20 07:06	10/3/20 15:58	Not having 11 hours continuous rest	

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					before entering to work.		
		14/3/20 15:54	15/3/20 07:00	16/3/20 07:58	15/3/20 is off-day. Less than 30 hours of continuous rest for a week.		
		Thus, a major non-conformance was raised.					
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 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 (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Hospital Assistant of Padang Buluh Estate and Bukit Hijau Estate has conducted linesite inspection on weekly basis for all the housing in all divisions. Seen the latest Housing Complex/ Creche/ Community Hall Inspections checklist dated 15/6/2020, 16/6/2020, 11/6/2020, 10/6/2020, 5/6/2020 and 3/6/2020 in Padang Buluh Estate, 7/6/2020, 12/6/2020, 22/6/2020 ad 30/6/2020 in Bukit Hijau Estate. Site visit to the housing in Main Division of Padang Buluh Estate found that community hall, place of worship such as mosque was provided in the estate. Government school was resided in the Jerai Division and Bukit Hijau Estate. The workers are provided with subsidized water. Free medical is provided to all the workers.</p> <p>Noted during interview with workers, the housing provided was adequate. Not more than 6 person live in one house with 3 bedrooms. The house were provided with electricity and free water supply.</p>				Complied	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>All the workers have been provided with 10kg of rice once every two months as per company's policy. Seen the records of distribution of rice for March 2020 and May 2020 in Padang Buluh Estate. Interviewed with the workers confirmed that they are easily access to adequate, sufficient and affordable foods where sundry</p>				Complied	

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		shops are available inside the linesite of estates and mill. Besides, the estates are neighbouring to the small town where they can easily access to foods and goods.	
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>(Endorsed by the RSPO BoG on 7th November 2019)</p> <p>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 exist (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).</p> <p><i>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.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks</p>	Sime Darby Plantation has established the prevailing wage calculation to include all the in-kind benefits provided to the workers. Sampled the prevailing wages for benefit of Maintenance & Utilities that provided to each worker, RM 101.88 and Health for each worker, RM 20.26. The prevailing wages is more than the Minimum Wage Order 2020.	Complied

<p>(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). 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.</p> <p><i>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 Wage</i> (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).</p> <p>Once these 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:</p> <ul style="list-style-type: none"> • 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 		
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	<p>used as the foundation for the gradual implementation of the living wage payment</p> <ul style="list-style-type: none"> The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>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.</p> <p>- Minor compliance -</p>	<p>All the core works are performed by permanent and full-time employees in SOU 1 Sg. Dingin POM and supply bases. No contract worker was employed.</p>	Complied
<p>Criterion 6.3</p> <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>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They respect the rights of their employees, workers in operations and communities through commitments which include respecting freedom of association of employees to join and form organization of their choice and bargain collectively. Besides, the site has issued a memo by the Managers in Bahasa Malaysia related to freedom of association.</p> <p>Padang Buluh Estate has conducted briefing on the policies to the workers on 13/5/2020, 2/3/2020 in Bukit Hijau Estate, 23/2/2020 in Sungai Dingin POM and 25/2/2020 in Somme Estate.</p>	Complied

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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>- Minor compliance -</p>	<p>There was a meeting conducted on 17/1/2020 in Somme Estate between the management representatives and NUPW estate's representative. Issues were recorded in the meeting minutes and incorporated into the SIA management plan dated 3/2/2020.</p> <p>NUPW representatives in Sg. Dingin POM has organized a meeting with the management on 10/4/2020 to discuss any issues related to workers. The issues reported during the meeting were responded by the management with proposed actions and recorded in the minutes. For eg: Workers complaint that the septic tank was full and caused blockage in the toilet. The management has requested quotation on 15/5/2020 from contractor and contract form with Doc. No.: 4300507465 was issued on 22/5/2020. Delivery Order# A 669/2020 dated 15/6/2020 and photo evident of clearing of the septic tank was sighted.</p> <p>NUPW meeting was held on 20/2/2020 in Bukit Hijau Estate with total 13 participants from management representatives and workers' representatives. Issues were recorded in the meeting minutes and responded by the management during the meeting.</p>	Complied
6.3.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Interviewed with the NUPW representatives and the workers confirmed that the election of the representatives were elected freely by the workers without any interference of management.</p>	Complied
<p>Criterion 6.4 Children are not employed or exploited.</p>			
6.4.1	<p>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>	<p>Sime Darby Plantation has developed Human Rights Charter where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations</p>	Complied

	- Minor compliance -	<p>Guiding Principles on Business and Human Rights. They 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> <p>Sampled the contract form with one of the contractors (Doc. No.: 4300501277 – Supplying labour for harvesting) in Padang Buluh Estate where the contract has clearly stated that the contractors shall comply with all the policies, regulation, MSPO & RSPO and rules.</p>	
6.4.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Workforce Management Unit has developed SOPP under Clause 3.1.13 LR13 – Recruitment Drive & Interview/ Selection of Foreign Workers where the minimum requirement of the age is 18 years old. Besides, the local employees must submit a photocopy of identification card during application of job to the management for verification purpose. Verified the SEMUA – Employee Master Listing and interviewed with workers confirmed that no child labour was employed.</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Employee Master Listing and through interviewed with the stakeholders.</p>	Complied
6.4.4	<p>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.</p> <p>- Minor compliance -</p>	<p>The estates and mill's management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders during stakeholder meeting.</p>	Complied
<p>Criterion 6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			

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<p>6.5.1</p>	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims.</p> <p>Padang Buluh Estate has conducted briefing on the policies to the workers on 13/5/2020, 2/3/2020 in Bukit Hijau Estate, 23/2/2020 in Sungai Dingin POM and 25/2/2020 in Somme Estate.</p> <p>Interviewed with the female workers confirmed that they are aware and understand their rights on sexual harassment and violence.</p>	<p>Complied</p>
<p>6.5.2</p>	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>SDPB has implemented Social 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.</p> <p>Besides, Sime Darby Plantation is in the midst to consolidate all the old policies into Human Rights Charter policy. The policy is under review in Board of Sustainability Committee and a board meeting will be conducted on 21/5/2020. With the board's approval, the revised HRC will be published in the company's website by June 2020.</p> <p>Padang Buluh Estate has conducted briefing on the policies to the workers on 13/5/2020, 2/3/2020 in Bukit Hijau Estate, 23/2/2020 in Sungai Dingin POM and 25/2/2020 in Somme Estate.</p> <p>Interviewed with the female workers confirmed that they are aware and understand their rights on reproductive.</p>	<p>Complied</p>

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6.5.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Somme Estate’s management has carried out an assessment for new mothers (with infants under 24 months) on 19/2/2020. Total 7 female workers were participated in the assessment and 1 new mother was identified. She has no special needs as the infant is having formula milk. Interviewed with the new mother confirmed that the management has allowed her to breastfeed during working hour.</p> <p>Assessment for new mothers was conducted on 10/4/2020 in Bukit Hijau Estate. There is one new mother with 4 months old child working in the estate during the assessment. The worker is staying outside the estate and she does not need any specific needs from the management at this moment.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 1/4/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in http://www.simedarbyplantation.com/corporate/governance/whistleblowing. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p>	Complied
<p>Criterion 6.6 No forms of forced or trafficked labour are used.</p>			

<p>6.6.1</p>	<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 for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Interviewed with the workers confirmed that no forced and trafficked labour in SOU 1 Sg Dingin operating units. The terms and conditions offered by the company were similar in their home country and when arrived in the plantations. No contract substitution has occurred. They have voluntarily surrendered their passport to the management for safekeeping with consent letter signed by the foreign workers. Overtimes was monitored by the company and the workers are giving freedom to choose to overtime and resign. There was no penalty for termination of employment if they wish to terminate the contract earlier as per the employment contract signed.</p> <p>Sampled of the employment contracts found that terms and conditions such as resignation/ termination of contract is clearly outlined and acknowledged by the workers. Sampled of contracts as below:</p> <ul style="list-style-type: none"> a. Employee No.: 108742 (Bukit Hijau Estate) b. Employee No.: 140263 (Bukit Hijau Estate) c. Employee No.: 25677 (Bukit Hijau Estate) d. Employee No.: 25675 (Bukit Hijau Estate) e. Employee No.: 27524 (Somme Estate) f. Employee No.: 27525 (Somme Estate) g. Employee No.: 156316 (Somme Estate) h. Employee No.: 149348 (Somme Estate) i. Employee No.: 79765 (Somme Estate) j. Employee No.: 85670 (Padang Buluh Estate) k. Employee No.: 152903 (Padang Buluh Estate) l. Employee No.: 58966 (Padang Buluh Estate) m. Employee No.: 151705 (Padang Buluh Estate) 	<p>Complied</p>
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		<ul style="list-style-type: none"> n. Employee No.: 156634 (Padang Buluh Estate) o. Employee No.: 26785 (Sungai Dining POM) p. Employee No.: 26786 (Sungai Dining POM) q. Employee No.: 91298 (Sungai Dining POM) r. Employee No.: 127734 (Sungai Dining POM) 	
<p>6.6.2</p>	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented. - Critical (Major) compliance -</p>	<p>SDPB has implemented a Sime Darby’s Human Rights Charter revised 2020 and can be easily access via www.simedarbyplantation.com where they committed as below:</p> <ul style="list-style-type: none"> a. Providing equal opportunity b. Respecting freedom of association c. Eradicating any form of exploitation d. Providing decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs e. Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution. <p>All the foreign workers will be provided with induction training prior to work. Besides, they were provided with decent living condition and free from any discrimination. The workers informed that they were treated equally without any discrimination and allow joining NUPW freely. No contract substitution has occurred through interviewed with the workers.</p>	<p>Complied</p>
<p>Criterion 6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			

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<p>6.7.1</p>	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Responsible persons for H&S are identified as safety committee members consists of employer representatives and employee representatives at each operating unit. The Occupational Safety & Health Meetings were done on a regular basis of every 3 months interval to address the safety and health issues in the estate. The issues discussed include Accident Investigations, Near Misses, Medical reports, Training Reports, Work Site Inspections and arising issues. Sample minutes of meeting records were sighted as following:</p> <ul style="list-style-type: none"> • SDPOM: FY 2019 3rd Meeting dated: 29/7/2019 • PBE: FY 2020 1st Meeting dated: 7/1/2020 • BHE: FY 2019 4th Meeting dated: 18/10/2019 • SE: FY 2019 2nd Meeting dated: 18/4/2019 	<p>Complied</p>
<p>6.7.2</p>	<p>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 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>- Minor compliance -</p>	<p>Accident of emergency procedure is presented in Mill Quality Management System Standard Operation manual (MQMS SOM) dated November 1st, 2008. Flowchart of emergency handling was presented in Appendix 5.5.3.3. Sighted during site visit, the workstation also equipped with fire extinguisher and first aid kit. Noted during interview with employee shows the understanding regarding emergency procedures.</p> <p>The mill has established Emergency Response Team lead by the Mill Manager. Sighted during site visit, the ERT chart and Fire Hydrant and Fire Extinguisher Map was displayed at several notice board in the mill.</p> <p>First aider presents at various work station at the mill and estate. The first aider responsible for first aid box at each workstation. During the interview with the sterilizer operator, press operator, harvester shows the awareness regarding the emergency procedure if accident occur, person responsible of every first aid box and the</p>	<p>Minor non-compliance</p>

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		<p>location of the nearest first aid box. However, during Visit to Bukit Hijau Estate workshop, it was found that the first aid box kept in workshop containing external use medicine that was expired on 31/5/2020. Hence, a Minor NC has been raised on the matter.</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>- Critical (Major) compliance -</p>	<p>Based on the established Sime Darby Plantation PSQM Operation Control Procedure title" Personal Protective Equipment; Doc. # SD/SDP/PSQM (ESH)/201-OS16; Rev. 0; Date: 26/2/2015. As per records of PPE issuance and inspection sample for Sg. Dingin POM Shift A workers; April 2020 for following PPE:</p> <ul style="list-style-type: none"> • Safety helmet • Ear plug • Safety shoe <p>During visit to Bukit Hijau Estate main division field block 2000C (R18) for spraying operation activity sampling, it was sighted that the sprayers were conducting spraying work without wearing goggle. Interview with sprayers revealed that they were provided with complete PPE for spraying including respirator, apron, rubber glove, rubber boot and helmet as well as clear goggle. Cross-checking with PPE issuance record also confirmed that the estate provided the sprayers with complete PPE as per Pictorial PPE Standard for spraying operation.</p> <p>However, the workers complaint that the clear goggle issued would cause sighting hazard upon wearing since the goggle screen would be covered with precipitated mist especially during hot weather, hence they would rather not be wearing them. The practice deemed unable to cover all potentially hazardous operations related to spraying activities. Thus, PPE was not use appropriately by workers to cover potentially hazardous operations. Hence, a Major NC has been raised on the matter.</p>	<p>Major non-compliance</p>

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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>- Minor compliance -</p>	<p>- Sg. Dingin POM : As per SOCSO contribution of mill employees for month of March 2020; SOCSO Form 8A; Employer Code: D630000407B; Total employee: 118 & May 2020; Total employee: 117</p> <p>- Bukit Hijau Estate: As per SOCSO contribution of mill employees for month of Mary 2020; SOCSO Form 8A; Employer Code: D6200000607W; Total employee: 345</p>	Complied
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>SOU 1 monitored and recorded its LTA in spreadsheet as per sighted LTI Daily Tracking_Manhours as at April 2020. Sighted sampled records shown the following:</p> <ul style="list-style-type: none"> • SDPOM: No. of loss days: 9.00; Total LTI hours: 72.00; Cumulative manhours without LTI: 378,419.00 • SE: No. of loss days: 0.00; Total LTI hours: 0.00; Cumulative manhours without LTI: 60,792.00 	Complied
<p>Principle 7: Protect, conserve and enhance ecosystems and the environment</p>			
<p>Criterion 7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators.</p> <p>The estate has established IPM program. The plan was reviewed on annually basis. The IPM consists of Planting Beneficial Plant, Rat Baiting Applications and Barn Owl Census.</p>	Complied

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		<p>The sampled estates has established IPM and reviewed on annually basis. The plan FY 2020 was focusing on planting beneficial plant, control Ganoderma disease, barn owl box and to control rat attack. The plan was monitored on monthly basis.</p> <p>Sighted the sampled implementation of the IPM plan as follows:</p> <p>Padang Buluh Estate</p> <ul style="list-style-type: none"> i. Latest Barn Owl Census was conducted in August 2019 with occupancy rate at 49% ii. Sighted during site visit at P03B, beneficial plant such as Cassia sp. and Antigonan sp. were planted along the main road. <p>Somme Estate</p> <ul style="list-style-type: none"> i. Barn owl box were placed in the estate at ratio of 1:16 ha ii. Sighted during site visit to P98, beneficial plant such as Cassia sp. and Antigonan sp. were planted along the main road 	
7.1.2	<p>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.</p> <p>- Minor compliance -</p>	<p>There were no species referenced in the Global invasive Species database and CABI.org sighted within the estate and POM premises.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>It was identified that there is no use of fire for the pest control at the estates during the visit to the fields.</p>	Complied
<p>Criterion 7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			

<p>7.2.1</p>	<p>(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. - Critical (Major) compliance -</p>	<p>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. Some of recommended pesticides are: Immature planting (sample) - General weeds : Glyphosate - Pennisetum polystachion : Metsulfuron Methyl - Stenochlaena palustris : Sodium chlorate Mature planting - Grass weed and Asystasia : glyphosate & 2,4-D amine The selection is also evaluated by the agronomist during his visit to the estate</p>	<p>Complied</p>															
<p>7.2.2</p>	<p>(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. - Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate. Sighted the sampled records of pesticides usage per ha at estate visited as follows:</p> <table border="1" data-bbox="1099 1106 1767 1351"> <thead> <tr> <th>Month</th> <th>Somme Estate</th> <th>Bukit Hijau Estate</th> </tr> </thead> <tbody> <tr> <td>Jan 19</td> <td>1.099</td> <td>1.66</td> </tr> <tr> <td>Feb 19</td> <td>0.056</td> <td>2.49</td> </tr> <tr> <td>Mar 19</td> <td>1.294</td> <td>1.61</td> </tr> <tr> <td>Apr 19</td> <td>2.357</td> <td>0.89</td> </tr> </tbody> </table>	Month	Somme Estate	Bukit Hijau Estate	Jan 19	1.099	1.66	Feb 19	0.056	2.49	Mar 19	1.294	1.61	Apr 19	2.357	0.89	<p>Complied</p>
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7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -</p>	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.	Complied																								
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -</p>	No prophylactic use of pesticide were identified in the estates	Complied																								
7.2.5	<p>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 authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to: 7.2.5a Judgment of the threat and verify why this is a major threat 7.2.5b Why there is no other alternative which can be used</p>	<p>Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. Based on the latest chemical register only class II, III & IV chemical used at visited estates. Alternative for class IA chemical, Methamidophos was used named Acephate under class III for bagworm infestation.</p> <p>Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.3:</p>	Complied																								

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	<p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative</p> <p>7.2.5d What is the process to limit the negative impacts of the application</p> <p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>	<p>Protect and disclose environmental impacts and minimise resource use stated:</p> <p>'We aim to minimise our foot print and continuously reduce our use of resources through:</p> <p>iv. Implementing integrated pest management programs, with no use of Paraquat or chemicals classed as hazardous under the WHO 1A. We will phase out the WHO 1B and those additional chemicals listed in the Stockholm or Rotterdam Conventions."</p> <p>Sighted and verified in all chemical register for all estates sampled, there was no usage of Paraquat and other Class 1A or 1B pesticides. Alternatives such as Glyphosate were used with the elimination of Paraquat. Based on the latest chemical register only class II, III & IV chemical used at visited estates.</p>	
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 Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>The pesticides operators have been given training regarding the usage safety and health issue and proper way for chemical application. Sighted the sampled training records as follows:</p> <p>i. Padang Buluh Estate – Safety and PPE training for sprayers dated 22/2/2020</p> <p>ii. Bukit Hijau Estate – Safety Work Procedure and Basic spraying work by Mycrop dated 16/1/2020</p> <p>iii. Somme Estate – Spraying Briefing dated 3/2/2020</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p>	<p>Empty pesticides container were triple rinsed and be reused as premix chemical container or being puncture and stored at designated store before being disposed as recycle waste by</p>	Complied

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	- Minor compliance -	<p>contractors, E-Idaman as per communication email by DOE, Kulim branch dated 5/1/2019</p> <p>Padang Buluh Estate</p> <p>Latest disposal was done on 13/12/2019. Sighted the weighbridge ticket no. 20830 with weight at 560 kg.</p> <p>Somme Estate</p> <p>Latest disposal was done on 30/12/2019. Sighted the weighbridge ticket no. 33 and 34 with weight at 280 kg.</p>	
7.2.9	<p>(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.</p> <p>- Critical (Major) compliance -</p>	No aerial spray conducted at all operating units in SOU 1.	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Estates visited conducted medical surveillance on annually basis base on CHRA recommendation. Sighted the sample records of medical surveillance conducted as follows:</p> <p>Padang Buluh Estate</p> <p>Medical surveillance for workers involve in pesticides and chemical handling was conducted on annually basis. Latest medical surveillance was conducted on 27/6/2020 involved 33 person including workers and staff. The report is yet to receive by the estate.</p> <p>The Health Care Assistant conduct the medical screening in every 2 months. Sighted the medical screening records for the month of April 2020, February 2020 and December 2019. All sprayers were fit to work as chemical handlers.</p> <p>Somme Estate</p>	Complied

		<p>Medical surveillance was conducted 17/3/2020. 9 workers were sent for surveillance and all found fit to work as chemical handlers.</p> <p>Additionally, the healthcare assistant conduct monthly medical screening for all workers involved in chemical handling. Sighted the medical screening report for the month of March, April and May 2020.</p> <p>Bukit Hijau Estate</p> <p>Latest medical surveillance was conducted in 30/5/2019 by certified OHD with reg. no HQ/08/DOC/00/409. 14 workers sent and found fit to work as chemical handler as per report no. dated 11/6/2019. For FY 2020, the medical surveillance scheduled in May 2020 was postponed due to Malaysia Movement Control Order and has been rescheduled in</p>	
7.2.11	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby has established Gender Policy on Motherhood Responsibilities and Reproductive Rights on prohibition of all confirmed pregnant and breast-feeding woman to work with pesticides. The policy has been communicated to the workers through induction training for new workers, morning briefing, iCARE Safety and Health Townhall meeting, and displayed at various notice board within the estate.</p> <p>The estates visited prohibited all confirmed pregnant and breast-feeding woman to work with pesticides as per internal memo signed by the estate manager. The memo has been displayed on the notice board at few strategic place in the estate.</p>	Complied
<p>Criterion 7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p>	<p>The OUs have identified the waste products and source pollution generated in the estates and mill. The waste are categorized as follows:</p>	Minor Non-Compliance

	<p>- Minor compliance -</p>	<p>Sg. Dingin POM</p> <table border="1"> <thead> <tr> <th>Type</th> <th>Item Description</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Scheduled Waste</td> <td>Used lubricant, used hydraulic oil, batteries, rags, electrical waste</td> <td>Workshop</td> </tr> <tr> <td>Used chemical</td> <td>Labs</td> </tr> <tr> <td>Domestic waste</td> <td>Rubbish</td> <td>Workers housing complex, office, workshop, store</td> </tr> <tr> <td rowspan="5">Industrial waste</td> <td>Boiler ash, decanter cake</td> <td rowspan="5">Mill process</td> </tr> <tr> <td>Palm Kernel shell</td> </tr> <tr> <td>POME</td> </tr> <tr> <td>EFB</td> </tr> <tr> <td>Scrap Iron</td> </tr> </tbody> </table> <p>The mill has established management Plan base on the identification and source of pollutions and the documented in Environmental Management Plan under section Waste management Plan FY 2020 and were available for review. In the management plan stated the objectives, category, types/location, action plan and monitoring frequency.</p> <p>Sighted during site visit at EFB dumping area, noted that the EFB was spilled over from the designated EFB dumping area. The leachate from the EFB flow on the ground into the estates field.</p> <p>Thus, minor NC were raised.</p> <p>All Estates</p>	Type	Item Description	Location	Scheduled Waste	Used lubricant, used hydraulic oil, batteries, rags, electrical waste	Workshop	Used chemical	Labs	Domestic waste	Rubbish	Workers housing complex, office, workshop, store	Industrial waste	Boiler ash, decanter cake	Mill process	Palm Kernel shell	POME	EFB	Scrap Iron	
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Type	Item Description	Location
Scheduled Waste	Used lubricant, used hydraulic oil, batteries, rags	Workshop
	Clinical Waste	Clinic
Domestic waste	Rubbish	Workers housing complex, office, workshop, store
Recycle waste	Recycle waste	Estate compound
	Empty Pesticide container	Main store

Estates sampled has established management Plan base on the identification and source of pollutions and the documented in Waste management Plan FY 2020 and were available for review. In the management plan stated the type of waste, description, source of pollution, action to be taken and person responsible.

Sighted the implementation as follows:

- i. All machinery/tractors maintenance services in the estate were done by appointed contractors, Sime Darby Industrial (SDI). Waste generated from maintenance activities such as used oil, used hydraulic, used battery and oil filter were collected and transport out by SDI based on DOE's written approval, ref:AS(BB) 91/110/619/161 Jilid 14(69) dated 6th September 2011.
- ii. Empty pesticides container were triple rinsed and be reused as premix chemical container or being puncture and stored at designated store before being disposed as recycle waste by

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		<p>contractors, E-Idaman as per communication email by DOE, Kulim branch dated 5/1/2019.</p>	
<p>7.3.2</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -</p>	<p>OUs sampled has established management Plan base on the identification and source of pollutions and the documented in Waste management Plan FY 2020. Waste disposal was done as per waste management plan established. Sighted the implementation as follows: Sg. Dingin POM The mill have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. The operating units monitored the generation of scheduled waste on monthly basis. The generation of scheduled waste recorded in Scheduled Waste Inventory Book and submitted to DOE through E-SWISS. Sighted the E-SWISS inventory for the month of May 2020. Latest disposal has been conducted on 19/7/2019. Sighted the evidence of disposal as follows: i. 19/7/2019, SW 410, C/N no. 2019071908QKOCES ii. 19/7/2019, SW 409, C/N no. 2019071909D8IECO iii. 19/7/2019, SW 322, C/N no. 2019071909B7810F iv. 19/7/2019, SW 305, C/N no. 2019071909LVMZYQ Current Scheduled waste storage was more than 180 days. The mill has applied for extension of time from DOE as per email dated 23/3/2020 attached with form AS.STOR/BT/2/2011 and has been approved by the DOE officer. All estates All machinery/tractors maintenance services in the estates sampled were done by appointed contractors, Sime Darby Industrial (SDI). Waste generated from maintenance activities such as used oil, used</p>	<p>Minor Non-compliance</p>

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		<p>hydraulic, used battery and oil filter were collected and transport out by SDI based on DOE's written approval, ref:AS(BB) 91/110/619/161 Jilid 14(69) dated 6th September 2011.</p> <p>Padang Buluh Estate Sighted during site visit at housing area and landfill, there evidence of recycle waste such as plastic bottle were disposed together with the domestic waste.</p> <p>Sighted during site visit at the workshop, empty paint container were not handled as scheduled waste.</p> <p>This shows the understanding of waste material is not effectively delivered to the workers.</p> <p>Bukit Hijau Estate Sighted during site visit at landfill in field 2003B, there evidence of recycle waste such as plastic bottle were disposed together with the domestic waste.</p>	
7.3.3	<p>The unit of certification does not use open fire for waste disposal. - Minor compliance -</p>	<p>Sg. Dingin POM Domestic waste was collected 3 times a week by appointed contractor and disposed at municipal landfill, Majlis Perbandaran Kulim.</p> <p>Padang Buluh Estate Domestic waste was collected 4 times a week. Sighted the evidence of payment waste collection paid to the workers.</p> <p>Sighted during site visit at the landfill, there was evidence of open burning used for domestic waste disposal in the landfill.</p> <p>Somme Estate Domestic waste was collected 3 times a week. Sighted the rubbish collection schedule and payment evidence for the month of January, February, March, April and May 2020</p>	<p>Minor Non-Compliance</p>

		Bukit Hijau Estate Domestic waste was collected 2 times a week. Sighted the rubbish collection monitoring records in 'Buku Laporan Kutip Sampah' for the month of January, February, March, April and May 2020	
Criterion 7.4			
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield as per SOP below: The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents; a) EQMS chapter B8 - Leguminous Cover Crops b) EQMS chapter B14 – Manuring c) ARM Section 8 – Manuring	Complied
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	Plant Nutrition and Protection Unit (PNU) prepare the annual fertilizer recommendation base leaf analysis result. Leaf analysis show the nutrient level was used as the guidance for the recommendation. As per company SOP, the soil sampling analysis carried at 5 years interval. The leaf analysis and soil analysis report was made available for review. Noted the analysis report for estate visited as follows: Padang Buluh Estate Latest Soil sampling was conducted on 24/6/2018. Refer report no. S34/2018	Complied

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		<p>Leaf sampling April 2019. Ladang Padang Buluh 2019/20 Agronomic and Fertiliser recommendations report – oil palm dated 21/10/2019 by Agronomist, Plant nutrient and protection unit Somme Estate Latest Soil sampling was conducted on 21/6/2018. Refer report no. S44/2018</p> <p>Leaf sampling May 2019. Ladang Padang Buluh 2019/20 Agronomic and Fertiliser recommendations report – oil palm dated 19/12/2019 by Agronomist, Plant nutrient and protection unit Bukit Hijau Estate Latest Soil sampling was conducted on 10/7/2018. Refer report no. S49/2018.</p> <p>Leaf sampling Jan 2019. Ladang Padang Buluh 2019/20 Agronomic and Fertiliser recommendations report – oil palm dated 14/5/2019 by Agronomist, Plant nutrient and protection unit</p>																																											
7.4.3	<p>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. - Minor compliance -</p>	<p>EFB application</p> <table border="1" data-bbox="1102 954 1888 1337"> <thead> <tr> <th></th> <th>Padang Estate</th> <th>Buluh</th> <th>Somme Estate</th> <th>Bukit Estate</th> <th>Hijau</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td></td> <td>560.23</td> <td>0.00</td> <td></td> <td>861.52</td> </tr> <tr> <td>Feb</td> <td></td> <td>471.94</td> <td>446.00</td> <td></td> <td>357.04</td> </tr> <tr> <td>Mar</td> <td></td> <td>0.00</td> <td>457.00</td> <td></td> <td>934.87</td> </tr> <tr> <td>Apr</td> <td></td> <td>931.42</td> <td>219.00</td> <td></td> <td>0.00</td> </tr> <tr> <td>May</td> <td></td> <td>796.48</td> <td>0.00</td> <td></td> <td>830.87</td> </tr> <tr> <td>Jun</td> <td></td> <td>0.00</td> <td>0.00</td> <td></td> <td>869.34</td> </tr> </tbody> </table>		Padang Estate	Buluh	Somme Estate	Bukit Estate	Hijau	Jan		560.23	0.00		861.52	Feb		471.94	446.00		357.04	Mar		0.00	457.00		934.87	Apr		931.42	219.00		0.00	May		796.48	0.00		830.87	Jun		0.00	0.00		869.34	Complied
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<p>7.4.4</p>	<p>Records of fertiliser inputs are maintained. - Minor compliance -</p>	<p>The estate maintain the records of manuring application as per recommendation by the agronomist. Observed application records as per agronomist recommendation:</p> <p>Padang Buluh Estate Month program: February - April 2020 Field: 2000F Ha program: 93.00 ha Type: AC Rate/palm: 2.00 – 2.50 kg/palm Month applied: February 2020</p> <p>Month program: February - April 2020 Field: 2010B Ha program: 49.00 ha Type: MOP Rate/palm: 2.00 kg/palm Month applied: June 2020</p> <p>Somme Estate Month program: April 2020 Field: 2009B Ha program: 91.12 ha Type: Rock Phosphate Rate/palm: 1.50 kg/palm</p>	<p>Complied</p>
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		<p>Month applied: June 2020</p> <p>Month program: February 2020 Field: 2010A Ha program: 87.04 ha Type: AC Rate/palm: 1.75 kg/palm Month applied: February 2020</p> <p>Bukit Hijau Estate Month program: March - April 2020 Field: 2004/20004A Ha program: 122.81ha Type: MOP Rate/palm: 1.50 kg/palm Month applied: June 2020</p> <p>Month program: March - April 2020 Field: 2003 Ha program: 99.84 ha Type: AC Rate/palm: 1.25 - 1.50 kg/palm Month applied: March 2020</p>	
<p>Criterion 7.5 Practices minimise and control erosion and degradation of soils.</p>			

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7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -</p>	<p>Soil series map available for both estates visited. No fragile soil categorized in the estates visited as per soil map issued by R&D Precision Agriculture Unit.</p> <p>Soil identified in the estates sampled as follows: Padang Buluh Estate Gajah Mati, Kuah, Local Alluvium, Rasau, Tebuk</p> <p>Bukit Hijau Bungor, Serdang Colluvium, Padang Besar, Kuala Kedah, Kuah, Batu Lapan, Gajah Mati, Jitra, Terap, Tavy, Kuala Berang, Nami, Local Alluvium</p> <p>Somme Estate Muchong, Alluvium, Kulai</p>	Complied						
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -</p>	<p>Stated in Reclassification of Conservation Set Aside (CSA) for Upstream Operation ver.2 dated 31/5/2019, ref. no. GSQM/PLS/CSA-GD01 under section 4.0 Conversion of crops/areas in Table A item as follows:</p> <table border="1" data-bbox="1099 1050 1861 1281"> <thead> <tr> <th>No</th> <th>Category</th> <th>Conversion to oil palm/other Agricultural Crops</th> </tr> </thead> <tbody> <tr> <td>4</td> <td>CSA</td> <td>Non-convertible for undeveloped peatland, slopes > 25 degree (more than 25 ha), buffer of non-gazette rivers/streams and forest boundary reserve</td> </tr> </tbody> </table> <p>The topography for all estates in SOU 4 was between 0° - 6°.</p>	No	Category	Conversion to oil palm/other Agricultural Crops	4	CSA	Non-convertible for undeveloped peatland, slopes > 25 degree (more than 25 ha), buffer of non-gazette rivers/streams and forest boundary reserve	Complied
No	Category	Conversion to oil palm/other Agricultural Crops							
4	CSA	Non-convertible for undeveloped peatland, slopes > 25 degree (more than 25 ha), buffer of non-gazette rivers/streams and forest boundary reserve							
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p>	<p>No new planting conducted at all estates visited.</p>	Complied						

	- Minor compliance -		
Criterion 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	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Soil series map available for both estates visited. No fragile soil categorized in the estates visited as per soil map issued by R&D Precision Agriculture Unit.</p> <p>As sighted in estates visited, the estates have taken into account the land terrain, drainage and road systems in planning the 2020 replanting.</p>	Complied
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest:</p> <p>"We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:</p> <p>vii. No new development of peat areas, regardless of depth or location. We will seek to rehabilitate existing plantings on peats where possible.</p>	Complied
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>The R&D Precision Agriculture conducted assessment and provided the estates with topography maps.</p>	Complied
Criterion 7.7			
No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil identified at all estates visited in SOU 1. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Complied

7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	<p>No peat soil identified at all estates visited in SOU 1. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Complied
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil identified at all estates visited in SOU 1. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Complied
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil identified at all estates visited in SOU 1. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	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.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil identified at all estates visited in SOU 1. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Complied

7.7.6	<p>(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 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil identified at all estates visited in SOU 1. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	<p>Complied</p>
7.7.7	<p>(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 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil identified at all estates visited in SOU 1. Verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	<p>Complied</p>
<p>Criterion 7.8 Practices maintain the quality and availability of surface and groundwater.</p>			
7.8.1	<p>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:</p> <p>7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>7.8.1b Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>The mill has established Water Management Plan and documented in Environmental Management Plan under section Water Management. The Plan focusing on reducing fresh water usage in the mill, water contingency plan and reduce water usage in housing area.</p> <p>The estates sampled has established Water Management Plan 2019. The management plan stated the water source, areas of concern, Monitoring, contingency plan, person responsible and time frame. The areas of concern focusing on water shortage/dry spell, severe water pollution, contamination of surface and ground water, rainwater harvesting and water reduction program by POM.</p> <p>Noted during the interview with workers in all OU's sampled, access to clean water is adequately provided to workers for household</p>	<p>Complied</p>

		consumption. Water supply is by government @ SADA at all sampled estates.													
7.8.2	<p>(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) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Management of riparian zone is guided by River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014).</p> <p>The widths of the buffer zones are guided by the following measurements:</p> <table border="1" data-bbox="1102 662 1888 962"> <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>Noted during interview with sprayers, the understanding on prohibition of spraying in the buffer zone area was acceptable. Padang Buluh Estate]</p> <p>Sighted the buffer zone for Sg. Jerung at field P14B and P14A, the area was well maintained. No evidence of chemical application in the area while the vegetation was well maintained. The area was clearly demarcated.</p> <p>Somme Estate</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														
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		<p>Sighted the buffer zone at field P14B demarcated with red and yellow pole. No evidence of chemical application along the buffer zone.</p> <p>Bukit Hijau Estate</p> <p>Sighted the buffer zone at Sg. Selambau in Petani Para div., the vegetation were well maintained and no evidence of chemical application in the area.</p>																							
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE accordingly. Sighted the Quarterly Return Form to DOE FY 2020 as follows:</p> <p>1st quarter:</p> <table border="1" data-bbox="1126 799 1863 1102"> <thead> <tr> <th>Month</th> <th>Parameter</th> <th>Results</th> <th>Test result no.</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Jan 4/1/2020</td> <td>BOD</td> <td>1540</td> <td rowspan="2">EP47/2020</td> </tr> <tr> <td>pH</td> <td>7.20</td> </tr> <tr> <td rowspan="2">Feb 25/2/2020</td> <td>BOD</td> <td>346</td> <td rowspan="2">EP73/2020</td> </tr> <tr> <td>pH</td> <td>7.6</td> </tr> <tr> <td rowspan="2">Mar 31/3/2020</td> <td>BOD</td> <td>808</td> <td rowspan="2">EP119/2020</td> </tr> <tr> <td>pH</td> <td>8.0</td> </tr> </tbody> </table>	Month	Parameter	Results	Test result no.	Jan 4/1/2020	BOD	1540	EP47/2020	pH	7.20	Feb 25/2/2020	BOD	346	EP73/2020	pH	7.6	Mar 31/3/2020	BOD	808	EP119/2020	pH	8.0	Complied
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Mar 31/3/2020	BOD	808	EP119/2020																						
	pH	8.0																							

7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>The mill monitors the water consumption/FFB on monthly basis. sighted the records FY 2019 as follows:</p> <table border="1" data-bbox="1099 443 1429 1098"> <thead> <tr> <th>Month</th> <th>L/FFB</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>1.45</td></tr> <tr><td>Feb</td><td>1.42</td></tr> <tr><td>Mar</td><td>1.54</td></tr> <tr><td>Apr</td><td>1.53</td></tr> <tr><td>May</td><td>1.53</td></tr> <tr><td>Jun</td><td>1.69</td></tr> <tr><td>Jul</td><td>1.72</td></tr> <tr><td>Aug</td><td>1.58</td></tr> <tr><td>Sep</td><td>1.70</td></tr> <tr><td>Oct</td><td>1.49</td></tr> <tr><td>Nov</td><td>1.41</td></tr> <tr><td>Dec</td><td>1.29</td></tr> </tbody> </table>	Month	L/FFB	Jan	1.45	Feb	1.42	Mar	1.54	Apr	1.53	May	1.53	Jun	1.69	Jul	1.72	Aug	1.58	Sep	1.70	Oct	1.49	Nov	1.41	Dec	1.29	Complied
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Criterion 7.9
Efficiency of fossil fuel use and the use of renewable energy is optimised

7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>Plan to reduce the usage of the non-renewable energy has been established by using renewable energy such as shell and kernel as fuel for boiler to reduce the usage of diesel.</p> <p>The mill monitored the consumption of diesel usage on monthly basis. The data monitoring was available for review at the mill and documented in the PalmGHG report.</p> <p>Renewable energy used is from biofuel, shell and EFB/fibre for boiler start-up. Sighted the sampled records of renewable energy usage for FY 2019 as follows:</p> <table border="1" data-bbox="1099 687 1588 836"> <thead> <tr> <th></th> <th>Shell</th> <th>Fibre</th> </tr> </thead> <tbody> <tr> <td>Total</td> <td>26644.80</td> <td>57095.99</td> </tr> <tr> <td>Ton/FFB</td> <td>0.07</td> <td>0.15</td> </tr> </tbody> </table>		Shell	Fibre	Total	26644.80	57095.99	Ton/FFB	0.07	0.15	Complied
	Shell	Fibre										
Total	26644.80	57095.99										
Ton/FFB	0.07	0.15										
<p>Criterion 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 minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Identification of significant pollutants and greenhouse gas (GHG) emissions has been done e.g. POME, diesel/fuel and fertilizer. Their usage have been recorded and documented at each of the operating units. The plan to reduce or minimise the GHG emission has been established and implemented. Among the action plans were:</p> <ul style="list-style-type: none"> i. Efficiency usage of renewable and non-renewable energy ii. To reduce usage of fuel for backhoe, engine and other vehicle iii. To reduce emission from backhoe, engine and boiler <p>Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring</p>	Complied									

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		<p>for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points.</p> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 4.0 which is submitted to the RSPO Secretariat. Based on verification of various record, the data in the RSPO PalmGHG Calculator was correct.</p>	
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 minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	No development within Sg. Dingin POM Certification Unit since 2014.	Complied
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	Significant pollutants identification and plans are documented under Pollution Prevention Plan for period of January to December 2020. Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.	Complied
<p>Criterion 7.11 Fire is not used for preparing land and is prevented in the managed area</p>			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting and land clearing since 15 November 2018.</p> <p>No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p>	No new planting and land clearing since 15 November 2018.	Complied

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	- Minor compliance -	No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	No new planting and land clearing since 15 November 2018. No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied
Criterion 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	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -	No new planting and land clearing since 15 November 2018.	Complied
7.12.2	(C) HCVs, HCS forests and other conservation areas are identified as follows: 7.12.2a 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. 7.12.2b 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.	High conservation value, Final Report for Strategic Operating Unit 1, ver. 2.0 dated March 2017. Only HCV 4 identified in the group estate with total area of 63.71 ha. Estate visited continue to monitor the HCV area. The issue monitored include of encroachment/Sign of trespassing, wildlife issues/conflicts/sightings, pollution/erosion issue and others. Sighted the sampled monitoring conducted as follows: Padang Buluh Estate	Complied

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	<p>This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>i. Sighted monitoring records dated 14/1/2020, 10/2/2020, 21/3/2020, 2/4/2020.</p> <p>ii. Sighted the buffer zone for Sg. Jerung at field P14B and P14A, the area was well maintained. No evidence of chemical application in the area while the vegetation was well maintained. The area was clearly demarcated.</p> <p>Somme Estate</p> <p>i. Sighted monitoring records dated 21/2/2020, 16/3/2020 and 17/4/2020.</p> <p>Bukit Hijau Estate</p> <p>i. HCV monitoring at Sg. Selambau buffer zone area was conducted once a month by security. The monitoring was recoded in 'Laporan Rondaan Kawasan Sungai'. Sighted the monitoring records dated 26/5/2020, 6/5/2020, 8/4/2020 and 28/3/2020</p>	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>		
7.12.4	<p>(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 relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>No new planting and land clearing since 15 November 2018.</p> <p>No HCS forest were identified in all estates is SOU 1 as per High conservation value, Final Report for Strategic Operating Unit 1, ver. 2.0 dated March 2017. Only HCV 4 identified in the group estate with total area of 63.71 ha.</p> <p>The estates visited has established management plan for the HCV identified as per recommendation by the assessor. The plan includes monitoring of buffer zone area and conservation area in the estate and surrounding area. Sighted the implementation of the management plan as follows as per criteria 7.12.2.</p>	Complied
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas,	No local communities have been identified in HCV areas, HCS forest after 15 November 2018 within Sg. Dingin POM certification unit	Complied

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	<p>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.</p> <p>- Minor compliance -</p>		
7.12.6	<p>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.</p> <p>- Minor compliance -</p>	<p>No RTE species identified in the estate visited as per Final Report for Strategic Operating Unit 1, ver. 2.0 dated March 2017.</p> <p>The estates management continue to promote awareness on HCV/RTE to the workers during morning briefing and training. Sighted at several strategic places in the estates visited such as office compound, muster ground, housing area and HCV area, signage on prohibition of capture, harm, collect or kill RTE species are erected.</p>	Complied
7.12.7	<p>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.</p> <p>- Minor compliance -</p>	<p>No RTE species identified in the estate visited as per Final Report for Strategic Operating Unit 1, ver. 2.0 dated March 2017.</p> <p>The estates visited continue to monitor the HCV area identified and promote awareness on HCV/RTE to the workers during morning briefing and training.</p>	Complied
7.12.8	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>No land clearing since without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within SOU 1 Sg. Dingin POM certification unit. Thus, this indicator is not available</p>	Complied

Appendix B: Approved Time Bound Plan

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>	For details please refer to Attachments: i) SDP - RSPO Certification Status for Malaysia Operations ii) SDP- RSPO Certification Status for Indonesia Operations iia) Updates on PT MAS iii) RSPO SCCS status for Sime Darby Plantation (Downstream Operations)
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)

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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</p> <p>* Effectively 33 Mills (Excluding Bintang Oil Mill)</p> <p>- 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</p> <p>*Effectively 23 Mills</p> <p>*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	0	2	<p>SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.</p> <p>Indonesia</p> <p>PT Mitral Austral Sejahtera: The properties was sold and currently SDP have no control in the management. The property was disposed on 25/6/2019 and an official letter on disposal of PT Mas was sent to RSPO Secretariat on 27/6/2019. Last meeting with all relevant stakeholders was done with RSPO CP during recent RT in Bangkok last November 2019.Both parties have responded to the legal reviewer report and submitted the comment to RSPO CP.</p> <p>As at Dec 2017, a total of 28,712 Ha of smallholders have been certified. The entire KKPA (1-5) in Sebamban, 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>

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					<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>Liberia</p> <p>As at 16/1/2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</p>
Total SOUs	33	24	0	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	12/8/2011	11/8/2020	SPO 550179	
2	Chersonese	Kuala Kurau, Perak	5/10/2011	4/10/2021	CU-RSPO-815148, RSPO 590800	
3	Elphil	Sg Siput, Perak	18/6/2011	17/6/2021	RSPO 550180	
4	Flemington	Teluk Intan, Perak	5/20/2011	4/10/2021	CU-RSPO-819144, RSPO 590802	
5	Seri Intan	Teluk Intan, Perak	3/3/2011	2/3/2021	CU-RSPO-811218, RSPO 0015	
5	Selaba	Teluk Intan, Perak	3/3/2011	2/3/2021	CU-RSPO-819142, RSPO 0016	
5a	Sg Samak	Teluk Intan, Perak	3/3/2011	NA	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
6	Tennamaram	Bestari Jaya, Selangor	3/3/2011	2/3/2021	CU-RSPO-819143, RSPO 0014	
7	Bkt Kerayong	Kapar, Selangor	15/4/2011	14/4/2021	RSPO 550181	
8	East	Carey Island, Selangor	19/5/2010	18/5/2020	SPO 543543	
9	West	Carey Island, Selangor	19/5/2010	18/5/2020	SPO 543594	

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9a	Sepang	Sepang, Selangor	19/5/2010	NA	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
10	Bukit Puteri	Raub, Pahang	7/7/2011	6/7/2021	CU-RSPO-815147, 18502206 001, 824 502 14020	
11	Kerdau	Temerloh, Pahang	7/7/2011	6/7/2021	CU-RSPO-819155, 18502207 001, 824 502 14019	
12	Jabor	Kuantan, Pahang	7/7/2011	6/7/2021	CU-RSPO-819156, RSPO 928288, 824 502 16049	
13	Labu	Nilai, Negeri Sembilan	30/12/2011	29/12/2021	CU-RSPO-819163, SGSRSP/PM/MY13/01284, 824 502 16039, SGS-RSPO/PC17-00004, CURSPO-855480	
14	Tanah Merah	Port Dickson, Negeri Sembilan	19/5/2010	18/5/2020	SPO 541905	
15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17/2/2024	SGS-RSPOPM-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	7/7/2011	6/7/2021	CU-RSPO-819157, RSPO 928188, 824 502 16051	
17	Kempas	Jasin, Melaka	20/5/2015	19/5/2020	RSPO-PC 00101	
18	Diamond Jubilee	Jasin, Melaka	5/10/2011	4/10/2021	CU-RSPO-819146, RSPO 591224	
19	Pagoh	Muar, Johor	28/1/2014	27/1/2024	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	20/10/2010	19/10/2015	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
20	Chaah	Chaah, Johor	18/11/2010	17/11/2020	RSPO 548299	
21	Gunung Mas	Kluang, Johor	19/5/2010	18/5/2020	RSPO 901888	
22	Bukit Benut	Kluang, Johor	5/10/2011	4/10/2021	CU-RSPO-819147, RSPO 591229	

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23	Ulu Remis	Layang-layang, Johor	11/4/2011	10/4/2021	SGS-RSPO/PM-00722, 824 502 16042	
24	Hadapan	Layang-layang, Johor	29/3/2011	28/3/2021	SGS-RSPO/PM-00715, 824 502 16040, BVC-RSPO20170623-01	
25	Segaliud	Sandakan, Sabah	20/5/2010	19/5/2015	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
26	Sandakan Bay	Sandakan, Sabah	1/10/2008	30/9/2023	RSPO 537872	
27	Melalap	Tenom, Sabah	21/1/2011	20/1/2021	RSPO 547124	
28	Binuang	Kunak, Sabah	16/1/2009	12/7/2020	RSPO 001	
29	Giram	Kunak Sabah	16/1/2009	12/7/2020	RSPO 002	
30	Merotai	Tawau, Sabah	16/1/2009	12/7/2020	RSPO 004	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
30b	Mostyn	Kunak Sabah	16/1/2009	NA	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
31	Lavang	Bintulu, Sarawak	30/12/2011	29/12/21	CU-RSPO-819166, MUTU-RSPO/053	
32	Rajawali	Bintulu, Sarawak	30/12/2011	29/12/21	CU-RSPO-819167, RSPO 0020	
33	Derawan	Bintulu, Sarawak	30/12/2011	29/12/21	CU-RSPO-819169, RSPO 0019	
34	Pekaka	Bintulu, Sarawak	30/12/2011	29/12/21	CU-RSPO-815150, MUTU-RSPO/054	Mill is mothballed, supply base merged into Lavang effective Dec 2017.

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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/Tanah Putih, Pujud, Rokan Hilir, Riau	16/1/2012	15/1/2022	MUTU-RSPO/011, SGS-RSPO/PC17-00005, SGS-RSPO/PC17-00005	
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6/7/11	6/7/2016	MUTU-RSPO/006b	Mill closed down
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3/7/2013	2/7/2023	MUTU-RSPO/027	
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9/11/2016	8/11/2021	MUTU-RSPO/006a	
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16/3/2012	3/8/2022	MUTU-RSPO/014	Recertification of Bebunga POM is in progress.
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2/9/2016	1/9/2021	MUTU-RSPO/003	
7	PT BAHARI GEMBIRA RIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9/7/2012	28/11/2022	MUTU-RSPO/019	
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25/11/2010	24/11/2020	MUTU-RSPO/002	
9	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16/3/2012	19/7/2022	MUTU-RSPO/016	Recertification of Pondok Labu POM is in progress.
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21/10/2016	20/10/2021	MUTU-RSPO/005	
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16/3/2012	19/11/2022	MUTU-RSPO/017	Recertification of Rantau Panjang POM is in progress.
12	PT LAGUNA	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30/12/2011	5/2/2022	MUTU-RSPO/009	
13	PT MANDIRI	BETUNG	Sungai Durian, Kotabaru, Kalimantan Selatan	1/4/2014	31/3/2024	MUTU-RSPO/035	
14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23/11/2010	22/11/2020	MUTU-RSPO/001	
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16/3/2012	16/3/2017	MUTU-RSPO/015	Mill is mothballed.

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16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11/9/2012	28/11/2022	MUTU-RSPO/020	
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9/9/2016	8/9/2021	MUTU-RSPO/004	
18 19	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU MANDAH	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	1/12/2016 1/4/2014	30/11/2021 31/3/2024	MUTU-RSPO/008 MUTU-RSPO/036	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8/12/2016	7/12/2021	MUTU-RSPO/007	
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10/7/2012	28/12/2022	MUTU-RSPO/018	
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18/7/2016	17/7/2021	MUTU-RSPO/088	
23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3/5/2013	2/5/2023	MUTU-RSPO/026	
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3/7/2014	2/7/2024	MUTU-RSPO/044	
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab.Sanggau, Kalimantan Barat	NA	NA	NA	PT Mitral Austral Sejahtera: The properties was sold and currently SDP have no control in the management. The property was disposed on 25 June 2019 and an official letter on disposal of PT Mas was sent to RSPO Secretariat on 27 June 2019. Last meeting with all relevant stakeholders was done with RSPO CP during recent RT in Bangkok last November 2019.Both parties have responded to the legal reviewer report and submitted the comment to RSPO CP.

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in [2019] for [Sg. Dingin POM] 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 [Sg. Dingin POM] and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.19
PKO	1.19

Extraction	%
OER	21.45
KER	5.8

Production	t/yr
FFB Process	277,795.63
CPO Produced	59580.91
PKO Produced	16103.38

Land Use	Ha
OP Planted Area	18104.42
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	0.00
Total	18104.42

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	135,078.61	0.68	6,376.49	0.51	0.00	0.00	141,455.10	
CO ₂ Emission from fertilizer	8,987.87	0.05	519.72	0.04	0.00	0.00	9,507.59	
NO ₂ Emission	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Fuel Consumption	1,286.82	0.01	39.01	0.00	0.00	0.00	1,325.83	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-128,036.54	-0.64	-6044.06	-0.48	0.00	0.00	-134,080.60	
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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Total	24,398.61	0.12	1,285.04	0.10	0.00	0.00	34,316.99
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*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	54,452.65	0.20
Fuel Consumption	130.48	0.00
Grid Electricity Utilization	1036.21	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	55,619.33	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	000
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	0

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

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	April 2019	18,503.81	6,169.38	24,673.19
2	May 2019	16,957.87	6,177.99	23,135.86
3	June 2019	12,982.85	5,218.16	18,201.01
4	July 2019	14,230.07	6,174.30	20,404.37
5	August 2019	17,256.86	5,911.24	23,168.10
6	September 2019	15,546.07	4,422.52	19,968.59
7	October 2019	15,803.24	4,477.14	20,280.38
8	November 2019	13,579.57	4,826.48	18,406.05
9	December 2019	12,557.41	5,375.90	17,933.31
10	January 2020	12,204.77	5,890.47	18,095.24
11	February 2020	15,908.20	10,539.16	26,447.36
12	March 2020	17,118.86	11,845.19	28,964.05
13	April 2020	21,630.05	7,522.63	29,152.68
14	May 2020	13,634.33	4,511.20	18,145.54
15	June 2020	10,739.13	3,475.26	14,214.39
16	July 2020	12,050.95	3,829.15	15,880.10
Total		240,704.06	96,366.16	337,070.22
Note:				

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
	NA	NA	NA
Note:			

C. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	SIME DARBY BIODIESEL SDN BHD	TR-2ba1b5ad-fb63; TR-e0ac5aa1-4e77; TR-1229a130-cd2d; TR-d6ad924c-20a8; TR-	320.06MT	

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		faa58787-876c; TR-b5e3ac25-d17e; TR-4ceec4a-fd7d; TR-43bda541-2fd2; TR-0c7a3c79-7499; TR-ac2de398-d559; TR-42bd68a5-694b; TR-185fed4a-d540		
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Note:

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)
	NA	NA	NA	NA

Note:

E. Records of CPO & PK Sold as conventional since the last audit (if any)

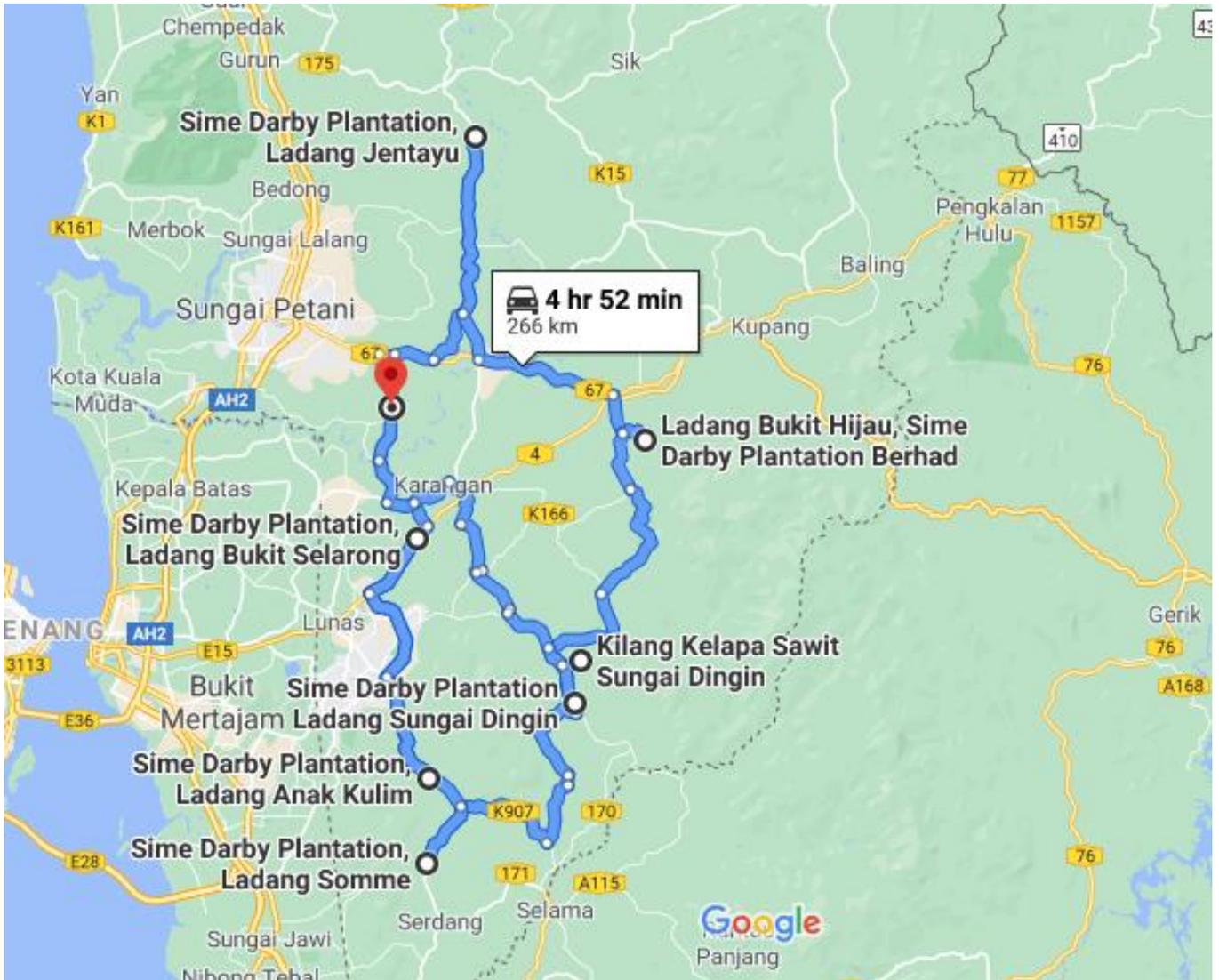
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	Buyer A	919.31	
2	Buyer B	719.62	
3	Buyer C	5347.28	
4	Buyer D	80.64	
5	Buyer E		2,019.02
6	Buyer F		6,418.53
7	Buyer G	729.63	
8	Buyer H	171.12	
9	Buyer I		37.80
10	Buyer J	1,157.83	
11	Buyer K	21,589.88	
12	Buyer L		2,537.07
13	Buyer M	36,116.22	
14	Buyer N	1,915.50	
15	Buyer O		7,537.49
	TOTAL	68,747.03	18,549.91

Note:

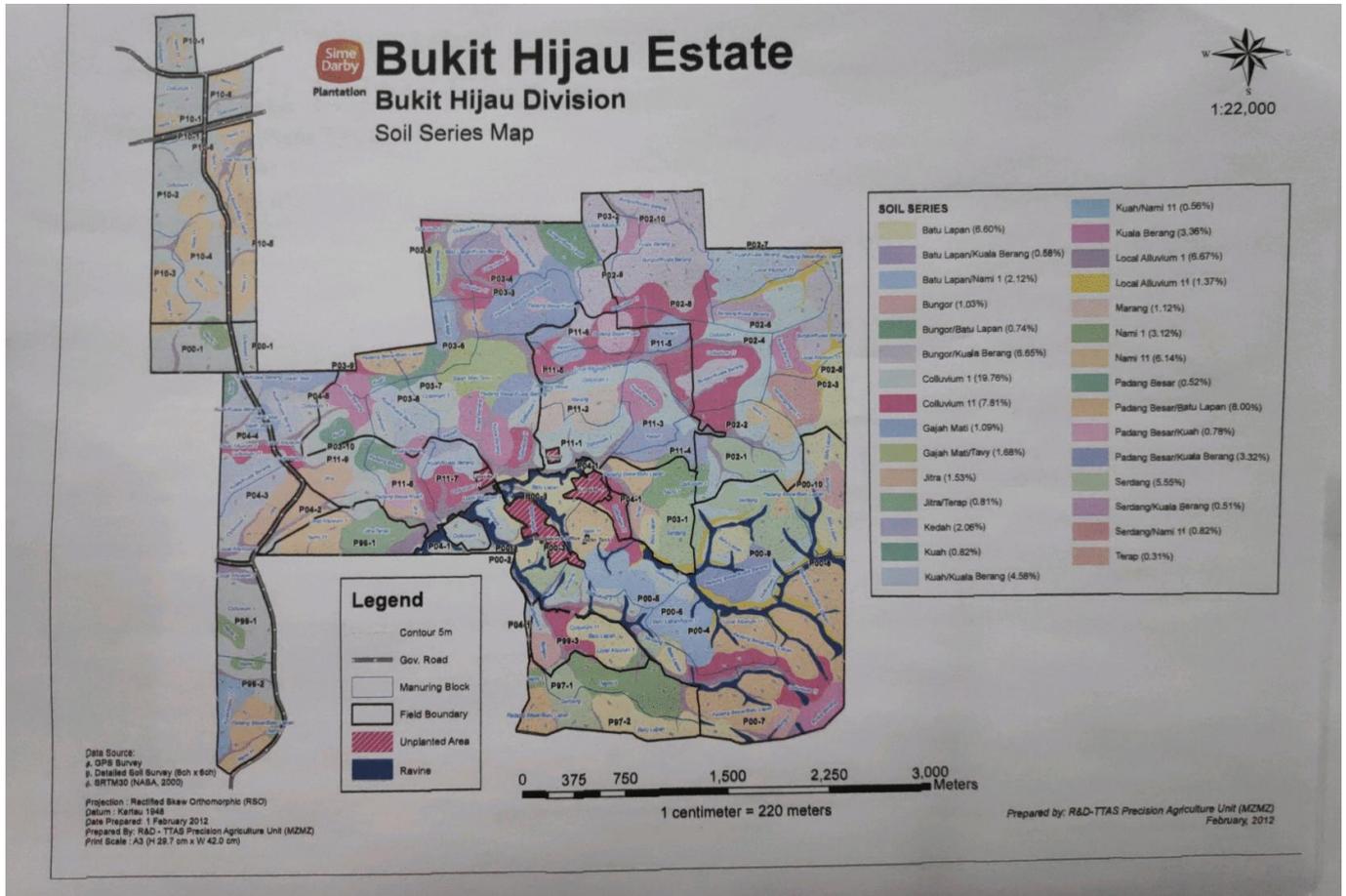
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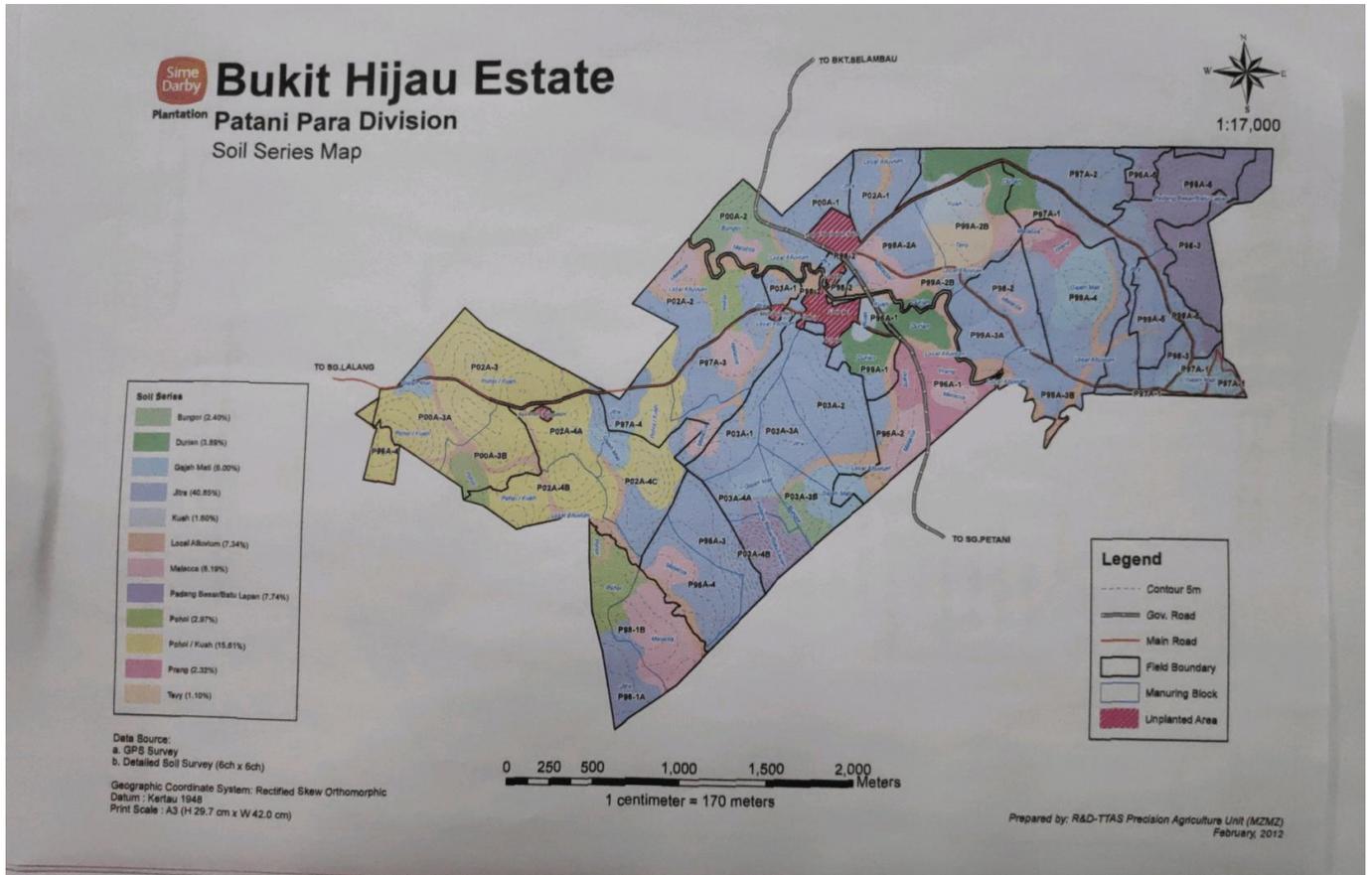
F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
1	Buyer AA	xxxx	20,000
2	Buyer BB	Xxxx	10,000
Note:			

Appendix E: Location Map of Certification Unit and Supply bases

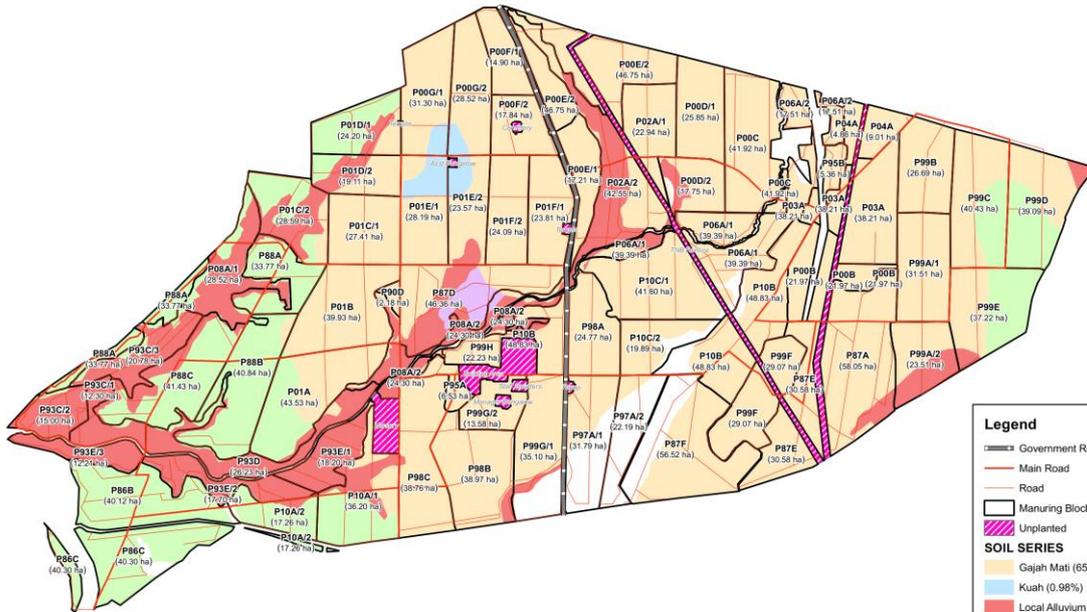


Appendix F: Estate Field Map





Sime Darby
Plantation Padang Buluh Estate
Padang Buluh Division
Manuring Block and Soil Series Map

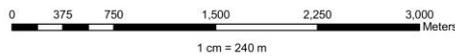


Legend

- Government Road
- Main Road
- Road
- Manuring Block
- Unplanted

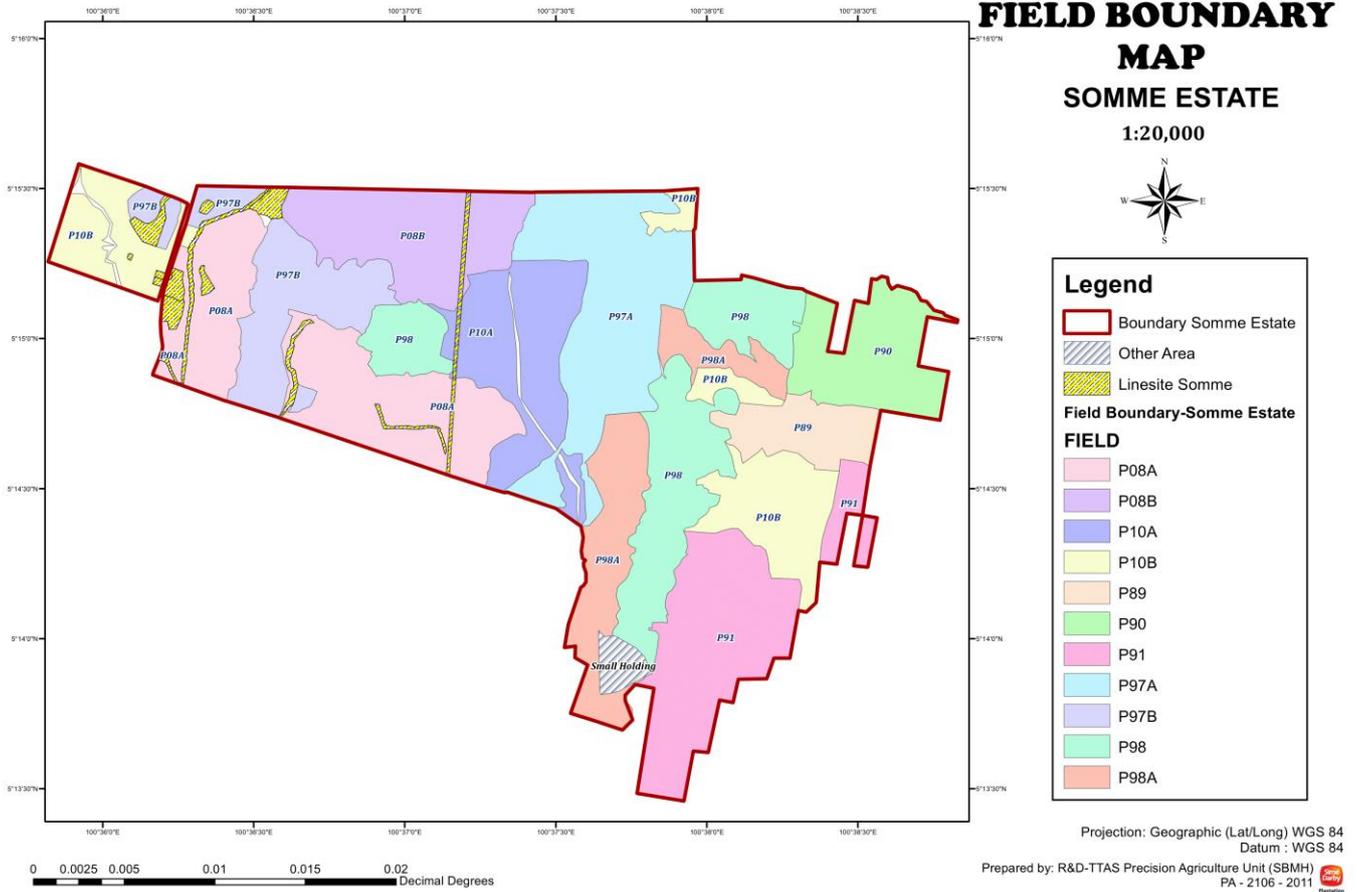
SOIL SERIES

- Gajah Mati (65.53%)
- Kuah (0.98%)
- Local Alluvium (15.00%)
- Rasau (17.95%)
- Tebok (0.54%)



Data Source:
a. Semi Detailed Soil Survey (20ch x 20ch)
b. GPS Survey
Projection : Rectified Skew Orthomorphic (RSO)
Datum: Kerntau 1948
Date Prepared: 5 January 2012
Prepared By: R&D - TTAS Precision Agriculture Unit (MMMZ)
Print Scale : A3 (H 29.7 cm x W 42.0 cm)

RSP0 P&C Public Summary Report
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Appendix G: List of Smallholder Sampled

NA

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
SIA	Social Impact Assessment
SOP	Standard Operating Procedure