

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (1_2)**
- Recertification Assessment** (Choose an item.)
- Extension of Scope**

Client Company name (Parent Company): SIME DARBY PLANTATION BERHAD
Client company Address: Level 5, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 19) Pagoh Palm Oil Mill and Supply Base Location of Certification Unit: Lot 2159, Ladang Pagoh, Mukim Jalan Bakri 84309 Muar, Johor, Malaysia
Date of Final Report: 23/01/2021

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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 5, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 19) – Pagoh Palm Oil Mill		
Location / Address	Lot 2159, Ladang Pagoh, Mukim Jalan Bakri 84309 Muar, Johor, Malaysia		
Website	www.simedarbyplantation.com		
Management Representative	Shylaja Devi Vasudevan Nair Tn. Mohd Fadzil Bin Hasbullah	E-mail	shylaja.vasudevan@simedarbyplantation.com
Telephone	+603-78484379 +606-9857427	Facsimile	+603 7848 4363

2. Certification Information			
Certificate Number	RSPO 600305	Date of First Certification	28/01/2014
		Certificate Start Date	28/01/2019
		Certificate Expiry Date	27/01/2024
Scope of Certification	Palm Oil and Palm Kernel Production.		
Visit Objectives	The objective of the assessment was to conduct an annual surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by Pagoh POM and Supply Base's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives.		
Assessment Cycle	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Annual Surveillance Assessment (RA 1 ; ASA 2) <input type="checkbox"/> Scope Extension		
Applicable Standards	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysian National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Group Certification 2016 <input type="checkbox"/> RSPO Independent Smallholders Standard 2019		
Supply Chain Module	<input type="checkbox"/> Identity Preserved <input checked="" type="checkbox"/> Mass Balance		

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 682037	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services (M) Sdn Bhd	27/12/2022
MSPO 685822	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3		27/12/2022
MSPO 714136	MSPO Supply Chain Certification 2018		04/09/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Pagoh Palm Oil Mill	Lot 2159, Ladang Pagoh, Mukim Jalan Bakri 84309 Muar, Johor.	2° 04' 40.62" N	102° 43' 07.30" E
Pagoh Estate	Lot 2159, Ladang Pagoh, Mukim Jalan Bakri 84309 Muar, Johor.	2° 04' 40.62" N	102° 43' 07.30" E
Lanadron Estate	Panchor 84500 Muar, Johor	2° 10' 48.70" N	102° 44' 04.00" E
Pengkalan Bukit Estate	Mukim Jalan Bakri 84309 Muar, Johor	2° 07' 29.80" N	102° 44' 32.00" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pengkalan Bukit Estate	2,977.41	2.87	147.94	3,128.22	95.18
Lanadron Estate	1,694.02	19.41	251.01	1,964.44	80.96
Pagoh Estate	1,988.02	9.10	328.81	2,325.93	85.47
Total	6,659.45	31.38	727.76	7,418.59	88.16

Remarks:

Welch Estate

Welch Estate has been removed from the SOU 19 Supply Base and transferred to SOU 18 Supply Base since 01/06/2019 due to the distance to SOU 18's Mill, Diamond Jubilee Mill being much closer than Pagoh Mill.

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6. Plantings & Cycle							
Estate	Age (Years)					Mature** (ha)	Immature (ha)
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Pengkalan Bukit Estate	538.24	1,033.76	1,312.82	92.59	-	2,439.17	538.24
Lanadron Estate	221.81	613.02	742.19	40.00	77.00	1,472.21	221.81
Pagoh Estate	616.56	695.13	445.65	230.68	0.00	1,371.46	616.56
Total (Ha)	1,376.61	2,341.91	2,500.66	363.27	77.00	5,282.84	1,376.61

7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			
	Estimated (mt) (Jan 20 – Dec 20)	Actual (mt) (Oct 19 – Sept 20)		Forecast (mt) (Jan 21 – Dec 21)
		Previous license period (Oct 2019 – Dec 2019)	Current license period (Jan 2020 – Sept 2020)	
Pengkalan Bukit Estate	57,540.94	8,513.10	37,509.24	51,599.09
Lanadron Estate	43,021.71	9,324.21	29,105.13	44,441.87
Pagoh Estate	39,428.70	5,975.04	24,072.81	36,492.17
Welch Estate	14,535.19	n/a	n/a	nil
Total	154,526.54	114,499.53		132,533.13

Remarks:
Welch Estate
Welch Estate has been removed from the SOU 19 Supply Base and transferred to SOU 18 Supply Base since 01/06/2019 due to the distance to SOU 18's Mill, Diamond Jubilee Mill being much closer than Pagoh Mill.

8. Certified Tonnage of FFB (from other certified unit(s))				
Estate	Tonnage / year			
	Estimated (mt) (Jan 20 – Dec 20)	Actual (mt) (Oct 19 – Sept 20)		Forecast (mt) (Jan 21 – Dec 21)
		Previous license period (Oct 2019 – Dec 2019)	Current license period (Jan 2020 – Sept 2020)	
	N/A			N/A
Muar River Estate		49.55	318.53	
Tangkah Estate		48.55	253.84	
Welch Estate		58.43	881.42	
Total		1610.22		

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9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Independent FFB Supplier	Tonnage / year			
	Estimated (mt) (Jan 20 – Dec 20)	Actual (mt) (Oct 19 – Sept 20)		Forecast (mt) (Jan 21 – Dec 21)
		Previous license period (Oct 2019 – Dec 2019)	Current license period (Jan 2020 – Sept 2020)	
Eng Huat Latex – Eng Huat Latex Concentrate	NA	14434.55	7454.78	NA
PPMSB – Pertanian Melaka		1062.30	3217.77	
Impressive Tran- Impressive Transforms Sdn Bhd		138.11	608.65	
Sin Chin Joo-Sin, Chin Joo Sdn Bhd		1920.41	8250.85	
Koperasi Grisek-Kop Mt Grisek Ledang		1075.25	3399.25	
Total		41,561.87		

10. Certified Tonnage				
	Estimated (Jan 20 – Dec 20)	Actual (Oct 19 – Sept 20)		Forecast (Jan 21 – Dec 21)
	FFB (mt)	FFB (mt)		FFB (mt)
Mill Capacity: 45 MT/hr	154,526.54	Previous license period (Oct 2019 – Dec 2019)	Current license period (Jan 2020 – Sept 2020)	132,533.13
		23,760.53	92,349.22	
SCC Model: MB	CPO (mt) (OER: 20.5%)	CPO (mt) (OER: 20.08%)		CPO (mt) (OER: 20.0%)
	31,677.94	4,851.82	18,468.22	26,506.63
		23,320.04		
	PK (mt) (KER: 5.25%)	PK (mt) (KER: 5.11%)		PK (mt) (KER: 5.20%)
	8,112.64	1,204.78	4,727.24	6,891.72
		5,932.02		
TOTAL	N/A			N/A

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11. Actual Sold Volume (CPO)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	1,401.21	-	-	8,791.77	10,192.98
Previous License period					
CPO (MT)	-	-	-	7,404.25	7,404.25
Total	1,401.21			16,196.02	17,597.23

12. Actual Sold Volume (PK)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	199.00	-	-	3,395.65	3,594.65
Previous License period					
PK (MT)	-	-	-	1,383.96	1,383.96
Total	199.00	-	-	4,779.61	4,978.61

13. Independent Smallholders Certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	-	-
IS-CSPKO	-	-
IS-CSPKE	-	-

Section 2: Assessment Process

Certification Body:

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

BSI is a leading global provider of management systems assessment and certification, with more than 84,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31.10.2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **13/10/2020 to 16/10/2020**. The audit programme is included as Section 2.3.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The Critical NC close out remote assessment was conducted on **23/11/2020**. Initially an on site audit was scheduled on the same day but due to the increasing number of Covid-19 cases in the region of the certification unit, a remote audit was deemed necessary for the safety of the client and auditors. The audit programs are included in Section 2.3. Evidence of Major Nonconformity was verified through sharing of documents via Microsoft Teams and interview with sampled workers through WhatsApp Video Call. The Remote Major Non conformity Closure Audit was concluded to be successful.

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 for the Production of Sustainable Palm Oil (**Malaysian National Interpretation 2019**) was used to guide the assessment 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 (and 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.

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

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the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA 1_1)	Year 3 (ASA1_2)	Year 4 (ASA1_3)	Year 5 (ASA1_4)
Pagoh POM	√	√	√	√	√
Pagoh Estate	√	√	√	√	√
Pengkalan Bukit Estate	√	√	√	√	√
Lanadron Estate	√	√	√	√	√

Tentative Date of Next Visit: October 11, 2021 - October 14, 2021

Total No. of Mandays: 12.0 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>
Vijay Kanna Pakirisamy	Trainee Lead Auditor	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, 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 assessed on the aspects of Occupational, Health & Safety and estate best practises. He is fluent in Bahasa Malaysia and English languages.
Valence Shem	Team Member	He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and the supply chain element. He is able to communicate in Bahasa Malaysia and English.
Elzy Ovktafia Chairul	Team Member	She graduated from University Putra Malaysia in Diploma of Agriculture, holding the designatory of LISP from the Incorporated Society of Planters. She is involved in audits and technical reviews works mainly for Sustainability Programme includes RSPO, MSPO and 2nd Party Audit for Social Compliance Programme (URSA, ETI) for 2 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015 and Social Compliance Audit by Verité. Prior to this, she was the Agronomist in R&D Department for almost 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During this assessment, she assessed on the aspects of legal, social and stakeholder engagement. Able to communicate in Bahasa Malaysia and English.

Accompanying Persons:

Name	Role
Nicholas Cheong	Observer

2.3 Assessment Plan

The RSPO P&C ASA 2 Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects	VKP	VSH	EO
Monday, 12/10/2020	1720 2015	- Travel from KL to Muar.	√	√	√
Tuesday, 13/10/2020	0700 0830	- Travel from Muar to Lanadron Estate	√	√	√
	0830 0900	- Opening Meeting: - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation).	√	√	√
	0900 1230	- Lanadron Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
	1230 1330	- Lunch	√	√	√
	1330 1700	- Lanadron Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	1700 1730	- Interim Closing Briefing	√	√	√

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Date	Time	Subjects	VKP	VSH	EO
Wednesday 14/10/2020	0830- 1230	<p>Pengkalan Bukit Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.</p> <p>Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)</p>	√	√	√
	1230 – 1330	Lunch	√	√	√
	1330 – 1700	<p>Pengkalan Bukit Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)</p>	√	√	√
	1700 – 1730	Interim Closing Briefing	√	√	√
Thursday 15/10/2020	0900 – 1230	<p>Pagoh POM 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, Lab, weighbridge and palm product storage area, etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) – <u>Pagoh POM & Estate</u></p>	√	√	√
	1230 – 1330	Lunch	√	√	√

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Date	Time	Subjects	VKP	VSH	EO
	1330 – 1700	<p>Pagoh POM 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.</p> <p>RSPO SCCS general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.</p>	√	√	√
	1700 – 1730	Interim Closing Briefing	√	√	√
Friday 16/10/2020	0830-1230	<p>Pagoh Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.</p> <p>Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)</p>	√	√	√
	1230 – 1330	Lunch	√	√	√
	1330 – 1600	<p>Pagoh Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)</p>	√	√	√
	1600 – 1630	Verify any Outstanding Issues and Preparation for Closing Meeting	√	√	√
	1630 – 1700	Closing Meeting	√	√	√

RSPO P&C Remote Major NC Verification Assessment Plan

Date	Time	Subjects	VKP
Monday 23.11.2020	1000 – 1030	Opening Meeting: Opening Presentation by Audit team leader. (via Microsoft Teams) Confirmation of assessment scope and finalize Audit plan	√
	1030 - 1130	Verification on Critical NC: <ul style="list-style-type: none"> • 1964604-202010-M1 • Site observation, workers interview (through Skype Call & Whatsapp Call) Document review – implemented evidence	√
	1130 – 1200	Closing Meeting	√

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Sime Darby Plantation Berhad Multiple Management Units / Time Bound Plan
- RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- (Malaysia National Interpretation) 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 Jan 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): https://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations	Yes
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.	Yes

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<p>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.</p>	<p>No. There is no new acquisitions as at latest TBP 2020.</p>	<p>Yes</p>
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Yes. Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. 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.</p> <p>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>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 1st Oct 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>Yes</p>

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	<p>For Liberia operations: As at 16 Jan 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):</p> <p>https://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operation</p> <p>ACOP 2019 has been cross-referenced as below:</p> <p>https://document.rspo.org/Sime_Darby_Plantation_Berhad_ACOP2019.pdf</p>	
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No lapses.	Yes
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	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above.	Yes
Un-Certified Units or Holdings		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	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).	Yes
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>No new plantings. As at 16 Jan 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):</p> <p>https://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operation</p>	Yes
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.	No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above	Yes
Any Labor disputes are being resolved through	No stakeholder comments or complaints received.	Yes

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a mutually agreed process, in accordance with RSPO P&C criterion 6.3.		
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	None noted. No stakeholder comments or complaints received.	Yes
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	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.	Yes
Have there been any stakeholder (including NGO) consultation conducted?	None noted. No stakeholder comments or complaints received.	Yes

3.3 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable as there is no smallholder scheme under SOU 19 Certification Unit.	NA

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 One (1) Critical; Three (3) Minor nonconformities and Two Opportunity For Improvement raised. The Sime Darby Plantation, SOU 19 Pagoh POM 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.

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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 Critical 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 #	1964604-202010-M1	Clause & Category (Critical / Minor)	7.2.10 (Critical)
Date Issued	16/10/2020	Due Date	13/01/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	23/11/2020
Statement of Nonconformity:	Annual Medical Surveillance was not conducted in accordance with the Chemical Health Risk Assessment Action Plan.		
Requirement Reference:	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.		
Objective Evidence:	<p>Based on the revised CHRA Report, dated 04th June 2020 by Assessor Dosh Reg: HQ/15/ASS/00/63, Continue to carry out medical surveillance programme by a registered OHD due to the employees exposed or likely exposed to chemicals hazardous to health and the chemical used are concluded as having significant risk for work units: a) Premix (All Chemicals), d) Line Site Fogging (Malathion & Sumithion), e) Workshop (Manganese) – Welder. The medical surveillance programme should be conducted at intervals if not more than twelve months or at such shorter intervals as determined by the OHD.</p> <p>As for Pagoh Estate, it was identified that there were 10 workers (Welders, Line-site Fogging & Pre-Mixers) that should be sent for medical surveillance at intervals of not more than 12 months. Medical Surveillance was conducted for these workers on 8th October 2020, 20 months after the previous medical surveillance (21st January 2019). The results have yet to be obtained by the operating unit.</p>		
Corrections:	The management has arranged for medical surveillance for employees as per recommendation in revised CHRA on 08.10.2020		
Root Cause Analysis:	Lack of monitoring on the Medical Surveillance Program that was to be conducted at intervals not more than 12 months. The miscommunication of the management to wait for revised CHRA instead of taking action based on recommendation by existing CHRA.		
Corrective Actions:	<ul style="list-style-type: none"> • Medical Surveillance Program is planned within 12 months in management plan. • To ensure the implementation/monitoring of the program is in accordance to the management plan. 		
Assessment Conclusion:	<p><u>Major NC Verification Assessment</u></p> <p>1. The medical surveillance program was successfully conducted on 08.10.2020 by U.N.I Clinic for 10 workers from Pagoh Estate. The Organophosphate and Manganese Test conducted for the workers were available in the Medical Surveillance Report dated 11.10.2020. 9 workers were declared fit to work with no traces of organophosphate or manganese in the samples. One worker was stated as suspected organophosphate poisoning and has been put under</p>		

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	<p>medical removal protection. All other result of biological exposure monitoring were within normal limit.</p> <p>2. The worker suspected with organophosphate poisoning was sent for re-medical test on 12.11.2020. The test result was not available yet during the verification audit. Meanwhile the worker has been removed from chemical related jobs and sent for other job. The letter provided to the workers and the workers staff dated 22.10.2020 was verified.</p> <p>3. The CHRA Action Plan 2020-2025 was available and verified undersigned by the Assistant Manager of Pagoh Estate.</p> <p>As the evidence provided were in accordance with the approved corrective action plan, thus the Major NC was successfully closed on 23/11/2020.</p>
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Non-conformity			
NCR Ref #	1964604-202010-N1	Clause & Category (Critical / Minor)	2.2.2 (Minor)
Date Issued	16/10/2020	Due Date	Next Assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	The contractor is not adhering to Pekeliling Majikan Bil 3 Tahun 2018, Akta Keselamatan Sosial Pekerja 1969, Peralihan Pampasan Kemalangan Pekerja Asing Daripada Skim Pampasan Pekerja Asing (SPPA), Jabtan Tenaga Kerja Kepada Skim Bencana Kerja Perkeso (SBKP).		
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
Objective Evidence:	<p>In Pengkalan Bukit Estate, there is no employer contribution for SOCSO for foreign worker (passport no: C5726483 worked for Hayati Enterprise Sdn Bhd) for month of July, Aug and Sept 2020.</p> <p>This is not complying with Pekeliling Majikan Bil 3 Tahun 2018, Akta Keselamatan Sosial Pekerja 1969, Peralihan Pampasan Kemalangan Pekerja Asing Daripada Skim Pampasan Pekerja Asing (SPPA), Jabtan Tenaga Kerja Kepada Skim Bencana Kerja Perkeso (SBKP).</p>		
Corrections:	<ol style="list-style-type: none"> The management has communicated the legal requirements to the said contractor through email on the EIS contribution to its employees. The contractor has registered the said employee for EIS. The first SOCSO contribution will take effect on October 2020. 		
Root Cause Analysis:	1. Hayati Ent has lack of awareness on the compliance of legal requirements.		
Corrective Actions:	<ol style="list-style-type: none"> The payslip of third party contractor will be monitored on a monthly basis to check on the legal requirements. To check during internal audit on all legal compliances by third party. 		

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Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.
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Non-conformity			
NCR Ref #	1964604-202010-N2	Clause & Category (Critical / Minor)	7.11.3 (Minor)
Date Issued	16/10/2020	Due Date	Next Assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	Some of the adjacent stakeholders has yet to be engaged on fire prevention and control measures.		
Requirement Reference:	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.		
Objective Evidence:	<p>SOU 19 had conducted a discussion on fire prevention and control measures through a stakeholders meeting on 16 July 2020 at Ladang Pengkalan Bukit covering all the operating units of SOU 19. However, based on the samples, the following adjacent stakeholders have yet to be engaged.</p> <p>Lanadron Estate:</p> <ul style="list-style-type: none"> • Tn. Khairunnasir Bin Md Zim, Pej. Penghulu Mukim. Jorak/Panchor • Tn. Lukman Bin Haji Hassan, Kg. Brohol • En. Mohd Khalid Bin Mohammad, Kg. Seri Tanjung,Panchor <p>Pengkalan Bukit:</p> <ul style="list-style-type: none"> • Hor Lee Estate <p>Pagoh Estate:</p> <ul style="list-style-type: none"> • Koo Seng Hiap • Lim Peng Guat @ Lim Peng Joo • Othman Bin Lembek • Toh Ah Chai @ Tuh Ah Moy • Koh Kong Hoe • How Bon Chon <p>Nonetheless, the list is not exhaustive.</p>		
Corrections:	<p>Lanadron & Pagoh</p> <ul style="list-style-type: none"> • To organize fire prevention/fire drill training which includes all stakeholders in FY2021. • To introduce Sime Darby prevention control to stakeholders in particular smallholders on the company ERT team, contact person during emergency, location of hydrant and hot spot identification by Sime Darby Head Quarters. <p>Pengkalan Bukit</p> <ul style="list-style-type: none"> • To communicate to Hor Lee Estate Management on the company fire prevention plan and control measures. 		

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Root Cause Analysis:	<p>Lanadron & Pagoh</p> <p>The mentioned stakeholder was not present during the stakeholder meeting on 16.07.2020 and there was no follow up on their response.</p> <p>Pengkalan Bukit</p> <p>The management of Hor Lee Estate is hardly engaging with Pengkalan Bukit Estate despite the invitation on stakeholder meeting. This is due to the both the owner and caretaker of the estate are based at outstation.</p>
Corrective Actions:	<ul style="list-style-type: none"> • To extend invitation to smallholders for fire drill / stakeholder meeting and monitored for their response / feedback. • To check during internal audit on smallholder’s participation in fire drill/ stakeholder meeting.
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.

Non-conformity			
NCR Ref #	1964604-202010-N3	Clause & Category (Critical / Minor)	6.7.2 (Minor)
Date Issued	16/10/2020	Due Date	Next Assessment
Closed (Yes / No)	No	Date of nonconformity Closure	“Open”
Statement of Nonconformity:	The monitoring of the First Aid Box and relevant trainings associated with First Aid Box holders were not effectively implemented.		
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:	<p>Pengkalan Bukit Estate</p> <p>The first aid box was sampled for the Spraying Gang, Water Treatment Plant Attendant/Nursery Mandore and Chemical Store. The First Aid boxes were found to be as below:</p> <ol style="list-style-type: none"> 1. The First Aid items in the First Aid Box were insufficient. There were less items in the box compared to the First Aid Items list that was in the box. 2. The First Aid items in the box were not labelled. (Acviflavine Lotion, Analgesic Cream) 3. The First Aid items in the box had no expiry date. (Acviflavine Lotion, Analgesic Cream) 4. Issues and Replenishment were not recorded in the first aid kit. 		

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	The sampled first aid box holders (Spraying Mandore & Nursery Mandore) were not trained on the procedure to use the first aid box. Sighted the First Aid Training dated 14.07.2020 did not include the sampled first aid kit holders. Interview with the mentioned workers indicated that they were not aware on how to use the items in the First Aid Kit items.
Corrections:	<ol style="list-style-type: none"> 1. Old first aid box from water treatment plant was collected and disposed accordingly to prevent usage of expired items. 2. All items in the first aid box is labelled on numbers as per checklist inside the box for easy identification. 3. The expiry date of each item is written on the first aid box. 4. The movement of the items is recorded on a daily basis including date and quantity of usage and replenishments. 5. Sampled first aiders are briefed on the usage of first aid box. Simple instructions are also provided in the first aid box for easy reference.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. The first aid box at the water treatment plant was replaced without collecting back the old one. The items in the old box was not replenished hence the items was found insufficient. 2. Medical Assistant is unaware of the requirement to label on the item itself. 3. Estate had purchased the item (Acviflavine Lotion, Analgesic Cream) in bulk and distribute into first aid box. The expiry date is at the main container and was not replicated (expiry date) into individual first aid box. 4. Medical assistant was not aware on the SOP for replacing or replenishing the shortage items in the box. 5. The sampled first aider was absent during the refresher training session. Lack of follow up by the MA on the attendance of the first aiders hence no follow up training was conducted to the first aiders.
Corrective Actions:	<ol style="list-style-type: none"> 1. Estate’s Medical Assistant to collect and monitor the condition of first aid boxes every 3 months. 2. Estate Senior Assistant to verify on the monitoring record. 3. To regularly train medical assistant on the SOP of First Aid Kit. 4. To check on the implementation of the SOP during internal audits.
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.

Opportunity for Improvements	
OFI # 1	Description
1	<p><u>1964604-202010-I1</u></p> <p>Indicator: 7.3.1</p> <p>Requirement: A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p>

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	<p>Issue: The wastes management plan can be further enhanced by including the management of recyclable wastes from the household and office such as plastic bottles/containers, glass, papers and metal.</p>
2	<p><u>1964604-202010-I2</u></p> <p>Indicator 7.12.2</p> <p>Requirement: HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>Issue: The awareness on HCV of Pagoh Estate management can be further improved in order to have clearer information in classifying the HCV area. For example, Pagoh Estate has classified the 16.52 Ha of "forest are" (occupied with rubber trees and rattan before) as HCV but classified otherwise in the HCV Re-assessment Report, August 2016.</p>

Positive Findings	
PF #	Description
PF 1	Good commitment and corporation from the management.
PF 2	Positive feedbacks from internal and external stakeholders.
PF 3	Well maintained labour quarters at the mill and all estates.
PF 4	Generally well implementation of Good Agricultural Practices (GAP).

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1833344-201906-M1	Clause & Category (Critical / Minor)	Indicator 4.7.1 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	20/01/2020
Statement of Nonconformity:	Health and safety plan was not implemented effectively.		
Requirement Reference:	A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.		
Objective Evidence:	Pagoh POM:		

	<ol style="list-style-type: none"> 1. A tractor was in operation with leaking diesel during start up engine and with few malfunction indicator bulbs for head lights and reverse light. 2. A canteen male worker was working in the kitchen canteen without having typhoid injection record. <p>Welch Estate:</p> <ol style="list-style-type: none"> 1. A tractor was in operation with malfunction steering horn and missing reverse light and signal indicator light. <p>Lanadron Estate- Nordanal Division:</p> <ol style="list-style-type: none"> 1. Safety Data Sheet for Hydraulic Oil, Engine Oil and Welding Rod were not available at the point of use in the workshop. 2. Pesticide chemical mixing area gate was broken and left open. 3. Used vehicle spare parts in the workshop store was found scattered on the workshop store floor without proper housekeeping. <p>Pengkalan Bukit Estate:</p> <ol style="list-style-type: none"> 1. A tractor was in operation with malfunction horn, missing front head light, reverse light and signal indicator light. 2. Wagon attached to the tractor for carrying the sprayers and spraying equipment was not in proper safe condition as noticed the sitting plank was missing with exposed metal bars.
<p>Corrective Actions:</p>	<p>Pagoh Mill:</p> <ol style="list-style-type: none"> 1. Daily preventive maintenance checklist provided to drivers, checked by supervisor and verified by Assistant Engineer. 2. All canteen worker (permanent or temporary) will be registered with Mill management and copy of typhoid injection book will be kept by Mill management. For future tender exercise, typhoid injection will be included in the pre – requisite condition. <p>Welch Estate:</p> <ol style="list-style-type: none"> 1. Daily inspection for the tractor will be done by the driver and verified by foreman and assistant manager. <p>Lanadron Estate:</p> <ol style="list-style-type: none"> 1. To include checking of SDS in the workplace inspection checklist 2. To include divisional store, mixing area and workshop in the workplace inspection by safety and health committee. 3. To conduct 5S awareness training to the Foremen and Staff in-charge by Assistant Manager. <p>Pengkalan Bukit Estate:</p> <ol style="list-style-type: none"> 1. Estate will identify all tractors that need to be repaired. Daily inspection for the tractor will be done by the driver and verified by foreman and assistant manager. 2. Arrangement of maintenance work will be carried out internally after delivery of the spare parts.
<p>Assessment Conclusion:</p>	<p>ASA 1_2 Verification Based on site visits at the mill and estate, the Health and Safety Plan was effectively implemented. All tractors were in good working condition with regular monitoring by the management. Trainings were conducted in accordance with the yearly training program. Work Place Inspection was conducted every 3 months to</p>

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	include all work stations. Workers with no prior typhoid injection records was prohibited from working at the canteen. Thus, the Major NCR remains closed.
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Non-conformity			
NCR Ref #	1833344-201906-M2	Clause & Category (Critical / Minor)	Indicator 5.3.2 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	20/01/2020
Statement of Nonconformity:	Empty chemical containers disposal was not implemented effectively.		
Requirement Reference:	All chemicals and their containers shall be disposed of responsibly.		
Objective Evidence:	<p>Pengkalan Bukit Estate:</p> <p>1. Landfill –Waste disposal in the landfill was not well implemented. Mixed up of empty pesticide drum, empty steel drum, empty gear oil bottle, empty grease container and plastic bottles were sighted.</p> <p>Welch Estate:</p> <p>1. Iron scrap yard – Mixed with broken empty pesticide drum.</p> <p>Lanadron Estate - Nordanal Division:</p> <p>1. Iron scrap yard – Mixed with broken empty pesticide drum.</p>		
Corrective Actions:	Pengkalan Bukit, Welch & Lanadron Estate: Briefing on waste disposal management (domestic, industrial and scheduled waste) to mandore, upkeep staff, tractor driver and storekeeper by Assistant Manager.		
Assessment Conclusion:	ASA 1_2 Verification Based on site visits at landfill area, scrap iron yard at the sampled estates, no empty pesticides were found. The empty pesticides containers were either reused to contain premixed herbicides or being triple rinsed and disposed through authorized collector. Thus, the NCR remains closed.		

Non-conformity			
NCR Ref #	1833344-201906-M3	Clause & Category (Critical / Minor)	Indicator 6.5.1 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	20.01.2020
Statement of Nonconformity:	Pay and conditions were not properly documented.		
Requirement Reference:	Documentation of pay and conditions shall be available		
Objective Evidence:	Pagoh POM: Sampled of the payslips and punch card for May 2019 for worker (Employee No.: 147827) in Pagoh POM found that she has worked on rest day (Thursday) on the date of 9/5/2019, 23/5/2019 and 30/5/2019 but has yet to pay double of wages as per the regulation. Besides, sampled the payslips for July – September 2019		

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	<p>and punch card of contractor’s worker (Shovel Driver – IC No.: 691025-01-6XXX) found that he has worked more than 26 days per month and more than 8 hours per day. However, the payslip could not show that the driver has paid the overtime and work on rest day rate as per the regulation.</p> <p>Lanadron Estate: Interviewed with the 3 sprayers of Gang 26 found that they were requested to work on Sunday to cover back the hectarage if there was raining day during weekdays. However, the wages that work on Sunday to cover back the raining day were paid as normal rate but the mandore was paid double rate by confirmed through interviewed with the mandore. The mandore told that it was their normal practice due to the sprayers are piece-rated workers. However, this is not accordance to the regulation where any employee employed on piece rates who works on a rest day, he shall be paid twice his ordinary rate per piece.</p>
Corrective Actions:	<p>Pagoh Mill:</p> <ol style="list-style-type: none"> 1. Monitoring and recording of daily input by the effected worker’s reporting line (Supervisor) 2. Submission a copy of payslip for each contractor workers quarterly and to be kept in the personal file for every contractor.
Assessment Conclusion:	<p>ASA 1_2 Verification During this visit, there is no recurrence issue. No overtime or work on rest day not paid according to the worker's productivity. The paid salary sighted for Pagoh POM Certification Unit for March, April and May 2020 were complied with the Minimum Wage Order 2019 (for all workers) and Minimum Wage Order 2020 (for workers in town, if applicable). Hence, the implementation of Major NC is effective and Major NC is remained closed.</p>

Non-conformity							
NCR Ref #	1833344-201906-N1	Clause & Category (Critical / Minor)	Indicator 6.5.3 Minor				
Closed (Yes / No)	Yes	Date of nonconformity Closure	16.10.2020				
Statement of Nonconformity:	Linesite inspection was not carried out effectively.						
Requirement Reference:	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.						
Objective Evidence:	<p>Welch Estate: Linesite visit found that the whole stretch of the drainage behind the House No.: 02/81 and 02/82 was clogged with bad odor.</p> <p>Lanadron Estate: Linesite inspection was carried out by using the Housing Complex/ Crèche/ Community Hall Inspections checklist. However, the inspection was not consistently carry out as per the regulation where it has to be carried out on weekly basis. The date of inspection as below:</p> <table border="1" style="width: 100%; margin-top: 10px;"> <tr> <td style="width: 50%;">Date of inspection</td> <td style="width: 50%;">Date of next inspection</td> </tr> <tr> <td style="text-align: center;">22.08.2019</td> <td style="text-align: center;">10.09.2019</td> </tr> </table>			Date of inspection	Date of next inspection	22.08.2019	10.09.2019
Date of inspection	Date of next inspection						
22.08.2019	10.09.2019						

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	17.07.2019	08.08.2019
	20.06.2019	17.07.2019
	06.06.2019	20.06.2019
	15.05.2019	06.06.2019
	03.05.2019	15.05.2019
	11.04.2019	25.04.2019
	22.03.2019	11.04.2019
	08.03.2019	22.03.2019
	22.02.2019	08.03.2019
	<p>Besides, linesite visit found that House No. 144 has the following issues:</p> <p>i) drainage clogged</p> <p>ii) sign of spillage of oil on the ground outside the house</p>	
Corrective Actions:	<p>Welch Estate: To replace the collapse drain with culvert.</p> <p>Lanadron Estate : Conduct refresher training for MA and appointed person-in-charge on Workers Minimum Standard of Housing & Amenities Act 1990.</p> <p>Evidence needed: Photo evidence from Welch Estate Linesite inspection for Nov 2019 (Main and Nordanal Div) Refresher training record</p>	
Assessment Conclusion:	<p>During ASA 1_2 Audit, site visit at Welch Estate and Lanadron Estate showed acceptable housekeeping and maintenance at housing area. Housing inspection checklist used with weekly inspect by staff with Medical Assistant. All damage and clog especially at housing no 144 has been cleared. Hence, the minor NC is closed.</p>	

Non-conformity			
NCR Ref #	1833344-201906-N2	Clause & Category (Critical / Minor)	Indicator 5.6.3 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	16/10/2020
Statement of Nonconformity:	The data in RSPO PalmGHG Calculator were inconsistent with data provided by the Operating Units		
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:	<p>Based on the verification of monthly records vs data input in PalmGHG Calculator, the following inconsistency were observed:</p> <p>Welch Estate</p> <ul style="list-style-type: none"> - Fertiliser MOP consumption: 225.80 MT actual vs 263.35 MT in PalmGHG Calculator. 		

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	<p>Lanadron Estate</p> <ul style="list-style-type: none"> - Diesel Consumption: 57904 L actual vs 58528 L in PalmGHG Calculator - Fertiliser MOP consumption: 352.45 MT actual vs 443.15 MT in PalmGHG Calculator.
Corrective Actions:	<p>Welch & Lanadron Estate:</p> <ul style="list-style-type: none"> - HQ will ensure the person in charge of data extraction from SAP, eg; the store clerk, and related personnel , etc is well informed on data extraction method in SAP system. - Validation of the data provided by the Operating Units through internal audit.
Assessment Conclusion:	<p>Verification of SAP accounting system and store issuance records for fertilizer and diesel consumption showed that the quantity reported in the Palm GHG calculator version 4 was tally and verifiable. Thus the minor NCR is closed.</p>

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1691857-201809-M1	Critical	4.7.2	12/10/2018	Closed out on 04/01/2019
1691857-201809-M2	Critical	2.1.1	12/10/2018	Closed out on 04/01/2019
1691857-201809-M3	Critical	6.5.2	12/10/2018	Closed out on 04/01/2019
1691857-201809-M4	Critical	4.6.5	12/10/2018	Closed out on 04/01/2019
1691857-201809-N1	Minor	4.8.2	12/10/2018	Closed out on 25/10/2019
1691857-201809-N2	Minor	2.2.2	12/10/2018	Closed out on 25/10/2019
1691857-201809-N3	Minor	4.1.2	12/10/2018	Closed out on 25/10/2019
1691857-201809-N4	Minor	4.1.3	12/10/2018	Closed out on 25/10/2019
1691857-201809-N5	Minor	6.5.4	12/10/2018	Closed out on 25/10/2019
1833344-201906-M1	Critical	4.7.1	25/10/2019	Closed out on 20/01/2020
1833344-201906-M2	Critical	5.3.2	25/10/2019	Closed out on 20/01/2020
1833344-201906-M3	Critical	6.5.1	25/10/2019	Closed out on 20/01/2020
1833344-201906-N1	Minor	6.5.3	25/10/2019	Closed out on 16/10/2020
1833344-201906-N2	Minor	5.6.3	25/10/2019	Closed out on 16/10/2020
1964604-202010-M1	Critical	7.2.10	16/10/2020	Closed out on 23/11/2020
1964604-202010-N1	Minor	2.2.2	16/10/2020	"Open"
1964604-202010-N2	Minor	7.11.3	16/10/2020	"Open"
1964604-202010-N3	Minor	6.7.2	16/10/2020	"Open"

3.5 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss SOU 19 Pagoh Palm Oil Mill 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

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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 <ol style="list-style-type: none"> Noraini Binti Gani NUPW Representative for Pagoh Mill Pagoh Mill Canteen Masjid Paya Panjang Othman Bin Lembek 	Union/Contractors <ol style="list-style-type: none"> SM Angkut Enterprise. Ichiban Precision Sin Chin Joo Sdn Bhd Munusamy A/L Muthan Baskaran A/L Kunjuraman Ketua Kg. Melayu Panchor Ketua Kg Hujung Tambak Hor Lee Estate
Government Departments <ol style="list-style-type: none"> Chaupi Raf Sdn Bhd - Klinik Pagoh Jabatan Tenaga Kerja Muar Balai Polis Pagoh Jabatan Alam Sekitar SJK Tamil Ladang Landron Sek.Keb Paya Panjang Bukit Pasir 	NGO No complaint by NGO for Pagoh POM's certification unit. Therefore, NGO was not contacted.

Stakeholders comment	
1.	<p>Feedbacks: <u>Contractors & Suppliers (Canteen Owner, SM Angkut, Eng Huat Latex, Baskaran Enterprise)</u> The contractors & suppliers signed agreement and Vendor Integrity Pledge. Some of the contractors & suppliers attended the stakeholder meeting conducted by estate & mill. They are aware of RSPO & MSPO. There was a complaint raised by FFB dealer on the penalty charged by mill for the rejected crop. This issue was highlighted by the FFB dealer during the meeting with management previously.</p> <p>Management Responses: Management mentioned that this is the practice for the whole Sime Darby management unit and the FFB supplier has improve on their FFB quality based on MPOB standards. If the FFB grading result is not agreed by the FFB supplier, they are free to conduct the joint grading together with the mill.</p> <p>Audit Team Findings: This is verified further through the agreement signed between FFB supplier and Sime Darby management. No further issue.</p>
	<p>Feedbacks:</p>

<p>2.</p>	<p><u>Gender Committee Representatives</u> Meeting conducted quarterly as per Gender Committee Handbook. No sexual harassment or domestic violence case were reported. New Mother need assessment is conducted if there is a new mother in each unit.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No other issue.</p>
<p>3.</p>	<p>Feedbacks: <u>NUPW Representatives</u> The selection of the representative is through the election from the workers. It was held between NUPW and members only, without the company’s interference. Any complaints will be solved in the NUPW meeting together with management. Minutes of meeting and letter of appointment sighted.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No other issue.</p>
<p>4.</p>	<p>Feedbacks: <u>Kampung Hujung Tambak, Kampung Melayu Panchor, Kampung Paya Panjang, Masjid Kampung Paya Panjang</u></p> <ol style="list-style-type: none"> 1. The villagers shared positive impact on the mill and estates operation where donation, job opportunity and good relationship established. 2. Head village of Kg Melayu Panchor shared his concerns of the villagers. They want to use the football field near school which is under Sime Darby’s land. 3. Masjid Kampung Paya Panjang would like to extend their appreciation to Sime Darby management for the good relationship and contribution to the Masjid management. The event such as Maulidur Rasul has been conducted together at estate’s surau. <p>Management Responses: The football field is under Sime Darby Property management since the main division at Lanadron Estate was transferred to property. Estate can only cascade this issue to property management. As far as estate concerns, no restriction to use the football field.</p> <p>Audit Team Findings: No other issue.</p>
<p>5.</p>	<p>Feedbacks: <u>SK Paya Panjang</u> The school management would like to extend their appreciation to Sime Darby Management for the full support and assistance. The attendance of students was good and no child labour issue. Only issue raised was for the management to consider on the assistance for worker’s children transportation to school.</p> <p>Management Responses: Management provide the transportation to the school and usually no issue on sending the children to school. For coming back, there are different times for primary and secondary school, so the driver needs to wait until everyone as finished and only then sends them back. Some parents prefer to pick their children themselves for evening session.</p>

	<p>Audit Team Findings: No other issue.</p>
6.	<p>Feedbacks: <u>Foreign & Local Workers at Housing Complexes</u></p> <ol style="list-style-type: none"> Majority workers are happy with the job, salary, house and overtime. Only 1 worker has a complaint on the ceiling fan damage where he mentioned that the management asked the worker to fix the faulty fan by himself.
	<p>Management Responses:</p> <ol style="list-style-type: none"> Worker did not write the complaint in complaint book although this is communicated to them during the policy briefing and induction training.
	<p>Audit Team Findings:</p> <ol style="list-style-type: none"> Noted on the issue. An NC was raised under clause 4.2.3
7.	<p>Feedbacks: <u>Police Officer - Pagoh</u></p> <p>Auditor has made verification with the Police Officer on below:</p> <ol style="list-style-type: none"> No major criminal case reported in Sime Darby estate or mill in Pagoh. No COVID 19 cases reported within Sime Darby complex. Management will share the worker's list and if there is any changes on the worker.
	<p>Management Responses: No other issue.</p>
	<p>Audit Team Findings: No other issue.</p>
8.	<p>Feedbacks: <u>Neighbouring Smallholder</u></p> <p>According to the neighbouring smallholder, a verbal complaint is made on the flood issue due to estate field drain water flows to his field.</p>
	<p>Management Responses:</p> <p>This verbal complaint was raised to the previous manager in 2018, however the current manager has agreed to bring the auditor and smallholder to verify the area mentioned.</p>
	<p>Audit Team Findings:</p> <p>The area mentioned has been verified during the audit. There is no evidence to determine whoever is right or wrong since the issue just verbally complaint to the previous manager in 2018. The auditor has inform the management to have a better communication with the neighbouring smallholder on the complaint procedure and this will be checked in the next assessment visit.</p>

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.

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Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Sime Darby Plantation, (SOU19) Pagoh POM and Supply Base has complied with the RSPO Principles and Criteria 2018 for Sustainable Palm Oil (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 Sime Darby Plantation, (SOU19) Pagoh POM and Supply Base is continued.

Report prepared by	Acceptance of Assessment Conclusion
Name: VIJAY KANNA PAKIRISAMY	Name:
Company Name: BSI SERVICES (M) SDN BHD	Company Name: SIME DARBY PLANTATION BERHAD (Company No. 647766-V) LADANG PENGKALAN BUKIT
Title: CLIENT MANAGER	Title:
Signature: 	Signature:  Senin Bin Sumirin (I the undersigned, being the 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.)
Date: 27 November 2020	Date: 7/12/2020

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	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Documents required for all unit of certification available at Pagoh POM Certification Unit. Among the documents sighted were:</p> <ul style="list-style-type: none"> • Land titles/user rights • Occupational health and safety plans • Plans and impact assessments relating to environmental and social impacts • HCV documentation • Pollution prevention and reduction plans • Details of complaints and grievances • Continuous improvement plans, • Public summary of certification assessment report • Group Sustainability Policy • Record of contributions to community development 	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>SOU 19 has conducted combined meeting with the stakeholders to share any new information on RSPO certification, environmental, social, safety and legal requirement applied to all operating units. All the stakeholders have raised issues and discussed with the management during the meeting. Sighted the latest minutes</p>	Complied

		meeting conducted for the whole SOU 19 as mentioned in the stakeholder minute of meeting dated 16.07.2020.	
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Request by stakeholders conducted through stakeholders meeting, visitor books, letters and forms. The mill and estates maintain the records of all request and responses. Sighted the records of requests from the stakeholders as follows:</p> <ol style="list-style-type: none"> 1. Lanadron Estate: Request from SK Kota Raja Panchor dated 21.07.2020 for cleaning and maintenance works. 2. Pengkalan Bukit Estate: Request from Kampung Panjang Sari representative on clean water supply on 01.10.2020. 3. Pagoh POM: Educational trip from Politeknik Tun Syed Nasir Syed Ismail students on 21.09.2020. 4. Pagoh Estate: Request to conduct the engagement ceremony at housing quarters on 28.07.2020. 	Complied
1.1.4	<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>The Standard Operation Manual dated 01.11.2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</p> <p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01.11.2008 documented the process for handling communication regarding social issues.</p> <p>This has been communicated to workers and stakeholders through:</p> <p>Stakeholder meeting:</p> <ul style="list-style-type: none"> • SOU 19 complex: 16/07/2020. 	Complied

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		<p>The new Group Sustainability Policy:</p> <ul style="list-style-type: none"> • Lanadron Estate: 08/07/2020. • Pengkalan Bukit Estate: 09-12/09/2020. • Pagoh POM: 17/01/2020. • Pagoh Estate: 27/08/2020. <p>The person in charge for social issues (communication and consultation) is as below:</p> <ul style="list-style-type: none"> • Lanadron Estate: Mr Norhaizan as per appointment letter dated 01/10/2019. • Pengkalan Bukit Estate: Mr Shahir bin M.Salleh as per appointment letter dated 01/01/2019. • Pagoh POM: Ahmad Junaidy as per appointment letter dated 15/01/2010. • Pagoh Estate: Mohd Azmil bin Samsudin as per appointment letter dated 06/01/2020. 	
<p>1.1.5</p>	<p>There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -</p>	<p>The latest stakeholders list updated as at 01 January 2020. Stakeholder’s details available included person in charge, address, e-mail and contact number. Example seen as below:</p> <ol style="list-style-type: none"> 1. Lanadron Estate: Department of Environment (DOE), No. 19-4 Tingkat 1 Wisma Tiam Lock, Jalan Sungai Abong, 84000, Muar, Johor, 84000, contact: 06-9556129. 2. Pengkalan Bukit Estate: GREENVISION TRADING & SERVICES SDN BHD, No.1A, Jalan Sungai Burung X, 32/X, Bukit Rimau, 40460 Shah Alam, Selangor. 3. Pagoh POM: Lotus Two, No 132A, Jalan Tengku Badar KS4, 42000 Port Klang, Selangor, contact: 016-7714229. 	<p>Complied</p>

		4. Pagoh Estate: JKPP Johor: Tingkat 9, Menara TJB Mufti 80534, Jalan Dato Mohd Mohamedom, Taman Dato Onn, 80350 Johor Bahru, Johor. Contact: +60 7-221 4121.	
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	<p>Sime Darby Plantation Berhad has implemented Code of Business Conduct (COBC) where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The policy was developed in Bahasa Malaysia and English and was available for verification during the audit.</p> <p>The policy has been briefed to all the workers as below: -</p> <ul style="list-style-type: none"> • Pagoh POM – 10 January 2020 • Pagoh Estate – 07 July 2020 • Lanadron Estate – 08 July 2020 • Pengkalan Bukit Estate – 16, 17 & 18 July 2020 <p>Contractors have been briefed and are required to sign the Vendor Integrity Pledge which consist of the compliance to ethical conduct at workplace. The sampled Vendor Integrity Pledge was sighted and recorded in 1.2.2.</p>	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Sime Darby Plantations ensure compliance towards the ethical business conduct (COBC) through internal audits conducted by GSM (Internal Audit Team). New workers are briefed on the COBC during the induction and regularly reminded during the morning briefings. Contractors have signed the contractors Integrity Pledge where they	Complied

		<p>have pledged to ensure compliance towards ethical business practise.</p> <p>Sighted the sampled Vendor Integrity Pledge as below:</p> <p><u>Pagoh POM</u></p> <ol style="list-style-type: none"> 1. KCG Engineering (M) Sdn Bhd (Workshop Spare Parts Supplier) dated 07.10.2020. 2. Lotus Two Enterprise (Workshop Labour Suppliers) dated 07.10.2020. <p><u>Lanadron Estate</u></p> <ol style="list-style-type: none"> 1. SM Angkut Enterprise (Backhoe Rental) dated 1st January 2020 2. CVM Transport Sdn Bhd. (FFB Transport) dated 27th September 2018. <p><u>Pengkalan Bukit Estate</u></p> <ol style="list-style-type: none"> 1. Kim Soon Lee Transport Sdn Bhd. (FFB Transport) dated 1st Jan 2020. 2. Ng Sah Leong (Road Surfacing Contractor) dated 1st Jan 2020. <p><u>Pagoh Estate</u></p> <ol style="list-style-type: none"> 1. Greenvision Trading & Services Sdn Bhd (FFB Transport) dated 27.09.2020. 2. Kim Soon Lee Transport Sdn Bhd. (FFB Transport) dated dated 27.09.2020. 	
<p>Principle 2: Operate legally and respect rights</p>			

Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -</p>	<p>The Certification Unit continues its commitment in complying with the applicable requirements. Among permits and licences verified at the certification unit are:</p> <p>Lanadron Estate:</p> <ol style="list-style-type: none"> 1. Permit Potongan Kerja Daripada Gaji Pekerja (Seksyen 24 Akta Kerja 1955), Serial No.: PP 3/34/1481, dated 15/4/2011 2. UPV permit No. PMT-JH/20 119161 & No. PMT-JH/20 119161, valid until 2/12/2021 3. Permit to Purchase Highly Toxic Pesticides, No. JHR/2020/ACP/62(GL), dated 12/4/2020 4. Permit to store diesel, No. J/MUR 000102, valid until 15/6/2020 5. MPOB License, No. 522273002000, valid until 31/7/2021 <p>Pengkalan Bukit Estate:</p> <ol style="list-style-type: none"> 1. Permit to Purchase Highly Toxic Pesticides, No. JHR/2020/ACP/26(GL), dated 23/2/2020 and JHR/2020/ACP/92(GL), dated 10/8/2020 2. Lesen Melencong atau Mengabstrak Air Sungai, No. BAKAJ:334/300/05/03/07/6,4,5, valid until 31/12/2020 3. Permit to store diesel, No. J 001145,6, valid until 25/7/2021 4. UPV permit No. PMT-JH/19 81741, valid until 12/11/2020 5. MPOB License, No. 518941002000, valid until 28/2/2021 <p>Pagoh POM:</p> <ol style="list-style-type: none"> 1. MPOB License, No. 506244915000, valid until 31/10/2021 	Complied

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		<ol style="list-style-type: none"> 2. UPV permit No. PMT-JH/20 114083, 79, 65, 62, 64, 75, 76, 66, 78, 63, 77, valid until 8/9/2020 3. Lesen Melencong atau Mengabstrak Air Sungai, No. BAKAJ:334/300/05/03/08/2, valid until 31/12/2020 4. CePPOME, #CePPOME/201164, valid until 16/3/2021 5. CePSWaM, #CePSWaM/209794, valid until 22/12/2020 <p>Pagoh Estate:</p> <ol style="list-style-type: none"> 1. MPOB License, No. 597369011000 (nursery), valid until 30/4/2021 2. MPOB License, No. 597369011000 (nursery), valid until 30/4/2021 3. UPV permit No. PMT-JH/20 100686, valid until 12/4/2020 4. Lesen Melencong atau Mengabstrak Air Sungai, No. BAKAJ:334/300/05/03/06/1, valid until 31/12/2020 5. Permit to store diesel, No. J 001098, valid until 17/6/2021 	
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>As per records of Sime Darby Plantation Berhad Estate/Mill – Upstream Malaysia Legal & Other Requirements Register (LORR) by Group Sustainability & Quality Management; Updated June 2020. Sighted latest inclusion as follows:</p> <ul style="list-style-type: none"> - Workers Minimum Standards of Housing and Amenities (Amendment) Act 2019 dated 24/1/2020 - Perintah Pencegahan dan Pengawalan Penyakit Berjangkit Peraturan-peraturan Pencegahan dan Pengawalan Penyakit Berjangkit (Langkah-langkah di dalam Kawasan tempatan) (No. 7) 2020 dated 9/6/2020 - Perintah Pencegahan dan Pengawalan Penyakit Berjangkit Peraturan-peraturan Pencegahan dan Pengawalan Penyakit 	Complied

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		Berjangkit (Pengkompanaan Kesalahan-kesalahan) (Pindaan) (No. 7) 2020 dated 9/6/2020	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	Based on site visit at boundary, methods used are trenching, PVC pegs (coloured with red and white) and roads. The demarcations were visibly maintained.	Complied
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	The mill and estates maintain a list of all contractors that are contracted with them updated for the year 2020 and as when there is a new addition of contractors. The list was sighted at all operating units.	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	All contracts contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party through the sampled contract agreements available at the operating units. Sighted the sampled contract agreements as below: - Lanadron Estate 1. SM Angkut Enterprise (Backhoe Rental) dated 1 st January 2020 2. CVM Transport Sdn Bhd. (FFB Transport) dated 27 th September 2018 Pengkalan Bukit Estate 1. Kim Soon Lee Transport Sdn Bhd. (FFB Transport) dated 1 st Jan 2020. 2. Ng Sah Leong (Road Surfacing Contractor) dated 1 st Jan 2020 Pagoh POM 1. KCG Engineering (M) Sdn Bhd (Workshop Spare Parts Supplier) dated 07.10.2020	Non-compliance

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		<p>2. Lotus Two Enterprise (Workshop Labour Suppliers) dated 07.10.2020 Pagoh Estate</p> <p>1. Greenvision Trading & Services Sdn Bhd (FFB Transport) dated 27.09.2020</p> <p>2. Kim Soon Lee Transport Sdn Bhd. (FFB Transport) dated 27.09.2020</p> <p>Nevertheless, in Pengkalan Bukit Estate, there is no employer contribution for SOCSO for foreign worker (passport no: C5726483 worked for Hayati Enterprise Sdn Bhd) for month of July, Aug and Sept 2020. This is not complying with Pekeliling Majikan Bil 3 Tahun 2018, Akta Keselamatan Sosial Pekerja 1969, Peralihan Pampasan Kemalangan Pekerja Asing Daripada Skim Pampasan Pekerja Asing (SPPA), Jabtan Tenaga Kerja Kepada Skim Bencana Kerja Perkeso (SBKP). Hence a minor nonconformity was raised.</p>	
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>The contract signed with contractors is sighted. For contractors, the clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC and Human Rights Charter protecting the rights of children.</p>	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • 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>There was only one third party direct sourced FFB i.e. Impressive Transform Sdn Bhd (ITSB). It was noted that the area size of ITSB stated in its MPOB license was 208.16 Ha. Nonetheless, Pagoh Mill Manager had checked with ITSB and confirmed that ITSB has the right to use only 82.62 Ha based on a letter dated 9/5/2013 from Pesuruhjaya Tanah Persekutuan. ITSB had lost the right to use the remaining 125.54 Ha of land to other party since 2013 but has not updated the information in its MPOB license. The mill manager has</p>	Complied

	- Critical (Major) compliance -	requested ITSB manager to excise the 125.54 Ha area from ITSB's MPOB license upon making the next renewal.																	
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1. - Minor compliance -	There were 4 indirectly sourced FFB and the mill is in the process of collecting the info described in 2.3.1.	Complied																
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	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	Annual business plan in the form of annual budget and the projection for 5 years (2020 – 2024) prepared as guidance for future planning. The business plan contains FFB yield, CPO, FFB mill intake (Group and OCP crop), OER and KER, Processing Cost, Checkroll and contract labour, Maintenance (EXT-Contract Hiring and SI-Internal i.e Spareparts), Consumables - Fuel and lubricants, general store and chemicals, EVIT (Vehicles running, TNB and Power supply), Fix Cost, Admin and Labour Cost, Mill Cost (Processing + Fix Cost) OPEX, CAPEX etc.	Complied																
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	A 5 year replanting program was available at all the estates visited. The data collected is as below: <table border="1" data-bbox="1137 1061 1930 1350"> <thead> <tr> <th>Year</th> <th>Lanadron Estate</th> <th>Pengkalan Bukit</th> <th>Pagoh Estate</th> </tr> </thead> <tbody> <tr> <td>FY2021</td> <td>113</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>FY2022</td> <td>Nil</td> <td>Nil</td> <td>139.45</td> </tr> <tr> <td>FY2023</td> <td>Nil</td> <td>164.53</td> <td>Nil</td> </tr> </tbody> </table>	Year	Lanadron Estate	Pengkalan Bukit	Pagoh Estate	FY2021	113	Nil	Nil	FY2022	Nil	Nil	139.45	FY2023	Nil	164.53	Nil	Complied
Year	Lanadron Estate	Pengkalan Bukit	Pagoh Estate																
FY2021	113	Nil	Nil																
FY2022	Nil	Nil	139.45																
FY2023	Nil	164.53	Nil																

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		FY2024	102.69	134.58	Nil	
		FY2025	99.70	166.05	Nil	
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 -	The management review 2020 was conducted on 03/07/2020 (Lanadron Estate), 02/07/2020 (Pengkalan Bukit Estate), 09/07/2020 (Pagoh POM) and 30/06/2020 (Pagoh Estate). Among the issue discussed are operation, changes that could affect the management systems, recommendation for improvement and other matters.				Complied
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.						
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -	The estate and mill have established the main social and environment improvement plans as stated in the Social Impact Assessment Plan and Environmental Management Plan. The Action plan have been developed based on the areas and issues of concern that have been raised. <u>SOU 19 Estates</u> 1. Social Improvement Plan <ul style="list-style-type: none"> • Review of social impacts and to implement plans to mitigate the negative impacts and promote the positive ones. • Compliance to SOP and legal requirements regarding to social. • To contribute to local communities' development. • To response on the issues discussed during the various avenues (Stakeholder Meeting, OSH Meeting, Trade Union Meeting, Complaint Book) 2. Environmental Improvement Plan				Complied

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		<ul style="list-style-type: none"> • To identify and mitigate the potential impact of operation to the environment. • Proper disposal of waste in accordance to SOP and legal requirements. • Waste Utilisation (Where possible) • Protection of Watercourse and wetland • Water consumption & Contingency Plan during Water Shortage, Dry Spell or Severe Water Pollution. • Monitoring of Water Usage • Management of human wildlife conflict. • To ensure pesticide/ herbicide used at its optimum level. <p><u>Pagoh POM</u></p> <ul style="list-style-type: none"> • To sell Decanter Solid cake to potential buyer 375mt per month • To sell sludge oil to potential buyer as mill doesn't have facilities to collect sludge oil from cooling pond and store the oil in the proper tank. • Reduce losses at Mill Raw Effluent from 0.55% to 0.50% per FFB. • To reuse worm screw. Reduce cost purchasing new material. • Reduce chemical consumption by effectively treating boiler water. 	
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:</p>	<p>The RSPO metrics template has not been issued by RSPO for reporting.</p> <p>The Annual Communication of Progress (ACOP) for 2019 was submitted to RSPO on 4th June 2020. The ACOP report for 2019 is available at the RSPO website. Link as below: -</p>	Complied

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	<p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <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>https://document.rspo.org/Sime_Darby_Plantation_Berhad_ACOP_2019.pdf</p>	
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
<p>3.3.1</p>	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>SOP available for the Palm Oil Mill and the Estates. Palm Mill holds two SOPs:</p> <ol style="list-style-type: none"> 1. Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill. 2. Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) to includes mill SOPs. Sighted SOP for fruit handling station, sterilization station, threshing station, pressing station, kernel recovery station, boiler station and effluent treatment plant. <p>Estates have a separate SOP which is SOP EQMS, Pictorial Safety Standard, Estate Quality Management System and Agricultural reference Manual that covered planting material, nursery techniques, replanting, land preparation, planting density, canopy management, water management, harvesting, loose fruit collection, weed control and transport.</p> <p>Sighted the Covid-19 SOP (Doc ID – SD/SDP/GSQM (OSH)/204-OD 8) available at the Mill and Estates dated 9th March 2020.</p>	<p>Complied</p>
<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>Sime Darby Plantations have set in place various means to ensure the consistent implementation of procedures are in place.</p> <ol style="list-style-type: none"> 1. <u>Management Review</u> 	<p>Complied</p>

		<ul style="list-style-type: none"> • Lanadron Estate – 03.07.2020 • Pengkalan Bukit Estate – 02.07.2020 • Pagoh POM – 09.07.2020 • Pagoh Estate – 30th June 2020 <p>2. <u>PMU Audit Report</u></p> <p>a) <u>Lanadron Estate (24th June 2019)</u></p> <ul style="list-style-type: none"> • Immature: 80% • Manuring: 83% • Building & Facilities Management: 94% • EVIT: 62% • Ex-Estate Cost: 100% <p>b) <u>Pengkalan Bukit Estate (21st May 2020)</u></p> <ul style="list-style-type: none"> • Immature: 75% • Nursery: 90% • Manuring: 95% • Building & Facilities Management: 96% • EVIT: 64% • Ex-Estate Cost: 100% <p>c) <u>Pagoh Estate</u></p> <ul style="list-style-type: none"> • Immature: 77% • Nursery: 87% • Manuring: 100% 	
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		<ul style="list-style-type: none"> • Building & Facilities Management: 100% • EVIT: 53% • Ex-Estate Cost: 100% <p>3. <u>Structured Crop Recovery Assessment</u> Lanadron Estate: 16th July 2019 Pengkalan Bukit Estate: 18th to 19th May 2020 KKS Pagoh: 18th – 22nd May 2020 Pagoh Estate: 21st May 2020</p> <p>4. <u>Plantation Advisory Report</u> Lanadron Estate: 17th – 18th May 2018 Pengkalan Bukit Estate: 07th to 10th July 2019 Pagoh Estate: 9th to 11th July 2018</p> <p>5. <u>Agronomist Report</u> Lanadron Estate: 20th July 2020 Pengkalan Bukit Estate: 11th and 12th June 2019 Pagoh Estate: 12th and 13th November 2019</p> <p>6. <u>Internal Audit</u> Pengkalan Bukit Estate – 24th June 2020 Pagoh POM – 25th June 2020 Pagoh Estate – 22nd June 2020</p>	
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		<p>7. Mill Advisory Report</p> <ul style="list-style-type: none"> • KKS Pagoh – 14th to 16th October 2019. 	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Operating units visited maintain all records of monitoring and available for review. The mill Advisor and Plantation Advisor (PA) are accountable to monitor the estates compliance towards the SOP, Budget and Productivity.</p> <p>Various checklists were available and being used by the estates and mill for operations, health and safety monitoring, workers welfare and environmental issues. Among the sighted reports available at the estate and mill are as below:</p> <ol style="list-style-type: none"> 1. Line site Inspections (Weekly) 2. Work Site Inspections (Quarterly) 3. Crop Quality Assessment by SQM (6 Months) 4. Plantation Management Unit (Yearly) 5. Internal Audit (Yearly) 6. Environment, Safety & Health Visit (As and When Required) 7. Structured Oil Recovery Assessment (SORA) – (6 Months) 	Complied
<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>There is no new planting at Lanadron Estate, Pengkalan Bukit Estate.</p> <p>Nonetheless, the assessment of environmental impact of its existing activities is documented in the following documents:</p> <ul style="list-style-type: none"> • Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register 	Complied

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		<ul style="list-style-type: none"> • Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI • Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE <p>The Social Impact Assessment (SIA) Report for SOU 19 dated 05-08 May 2015 and addendum of Social Impact Assessment on Replanting activity dated 20/07/2020 (Lanadron Estate & Pengkalan Bukit Estate), SIA Report for Pagoh Estate dated 5-8/05/2015, SIA for Replanting activity dated 29-31/05/2013 (Pagoh POM) and 20/07/2020 (Pagoh Estate) are available. The report includes both positive and negative impact and its recommendation.</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><u>Environmental Impact Assessment</u> Environment Aspect and Impact Identification for various activities- construction work, compound, dispensary, field, harvesting and collection, main entrance, pest and disease control, petrol and diesel, power station, replanting, road, schedule waste store, workshop.</p> <p>After the EAI is completed, the Environmental Impact Evaluation is conducted to evaluate the impact severity using a format (Environmental Impact Evaluation Form). There are 3 classifications of impact established in order to justify the action plan (mitigations) required i.e.:</p> <table border="1" data-bbox="1137 1252 1921 1383"> <thead> <tr> <th colspan="2">Guidance of Action required</th> </tr> </thead> <tbody> <tr> <td>100 ~ 199</td> <td>No action required</td> </tr> <tr> <td>200 ~ 249</td> <td>To initiate corrective and preventive actions</td> </tr> </tbody> </table>	Guidance of Action required		100 ~ 199	No action required	200 ~ 249	To initiate corrective and preventive actions	Complied
Guidance of Action required									
100 ~ 199	No action required								
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		<table border="1" data-bbox="1144 363 1924 432"> <tr> <td data-bbox="1144 363 1391 432">250 and above</td> <td data-bbox="1391 363 1924 432">To develop environmental objective and programme</td> </tr> </table> <p>Mitigation measures were documented in Pollution Preventive Plan (PPP).</p> <p><u>Social Impact Assessment</u> The assessment was used methodology of interview workers based on workstation, harvesters, sprayers, union representatives, gender committee, contractor, supplier, local community, neighbouring estate and government. The secondary data collection – document review/file checking also been made.</p>	250 and above	To develop environmental objective and programme	
250 and above	To develop environmental objective and programme				
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>There is no new planting in SOU 19 (Pagoh POM Certification Unit). Sighted the Social Action Plan based on the SIA and issues raised through the gender committee and external communication.</p> <p>Examples seen as below:</p> <ol style="list-style-type: none"> 1. Lanadron Estate: Social management: Stakeholder SK Kota Raja to carry put spraying at school boundary and grasscutting at football field. Actions: Spraying has been done on 17th July 2020 and football field grasscutting been carry out twice a month. Estate has purchased crusher run in June/July 2020 to do the repair together with machine (backhoe). 2. Pengkalan Bukit Estate: Pandemic prevention: COVID 19 management plan. Social distancing during Muster, temperature checking for employees and visitors, limited access to Surau, registration of My Sejahtera, briefing on COVID-19 status. 3. Pagoh POM: Stakeholder meeting: Kg Paya Panjang: Request maintenance of the road between Kampong Baru 	Complied		

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		<p>and Pagoh Estate (Gentian Division) boundary to install culvert.</p> <p>4. Pagoh Estate: Replanting activity: Engagement with harvesters: Workers requested for resting area at open space. Management has identified suitable area to set up shelter as open space is prone to damage by wind.</p> <p>Updating of the progress of plan is carried out by the assistant managers and the results of the monitoring effectiveness are reviewed in the management units operating meetings. Mitigation measures were included in the environmental and social management plan and reviewed from time to time.</p>	
Criterion 3.5: A system for managing human resources is in place.			
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>SDPB have implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 2nd December 2019, where the management is committed to contributing to a better society includes respecting, upholding & no-exploitation of fundamental human rights, providing safe and healthy workplaces and protecting workers' welfare and engaging and empowering communities.</p> <p>The SOPP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liaison and recruitment, documentation and processing (Doc no: WMU/DP SOPP/JAN2016/R1), workforce management centre and estate are available upon request.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>The SOPP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liaison and</p>	Complied

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		<p>recruitment, documentation and processing (Doc no: WMU/DP SOPP/JAN2016/R1) and Hiring of Local Workers (Doc No: 01/12/2019) are available upon request. This procedure been explained to worker during the induction training on their first-time arrival.</p>	
<p>Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -</p>	<p><u>Pengkalan Bukit Estate</u> HIRARC was available to cover all risk that had been identified in the estate. Among the HIRARC sighted was Covid 19, Harvesting, Transport FFB and Water Treatment Plant. The latest revision of Hirarc was on 20.07.2020 due to an accident that occurred on 15.07.2020.</p> <p>CHRA was conducted on on 04th June 2020 by registered assessor Nor Khairunnisa Liyana Binti Ahmid. (HQ/15/ASS/00/363).</p> <p><u>Pagoh Estate</u> HIRARC was available to cover all risk that had been identified in the estate. Among the HIRARC sighted was Covid 19, Harvesting, Transport FFB and Water Treatment Plant. The latest revision of Hirarc was on 26.06.2020 due to an accident involving the Road, Bridges & Culvert work dated 28.03.2020.</p> <p>CHRA was conducted on on 04th June 2020 by registered assessor Nor Khairunnisa Liyana Binti Ahmid. (HQ/15/ASS/00/363).</p> <p><u>Pagoh POM</u> HIRARC was available to cover all risk that had been identified in the mill. Among the HIRARC sighted was Covid 19, Transport FFB</p>	<p>Complied</p>

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		<p>and Water Treatment Plant. The latest revision of HIRARC was on 18.08.2020. HIRARC for Threshing Station – De-choking of FFB press had been reviewed on 24.06.2020 due to an accident that occurred.</p> <p>CHRA was conducted by Global Safe-T Sdn Bhd (Dosh Reg No: Jh120161055) on 10 to 30 April 2018. The CHRA report was available during assessment. The action plan for CHRA recommendations were listed out with the PIC and status of compliance available.</p> <p>Audiometric test was conducted for 52 mill workers by Procoma Environmental (M) Sdn Bhd on 11th June 2020. It was concluded that there were 23 abnormal results. It was recommended that the mill appoints an OHD to do proper examination and to follow up on the 23 workers. The Annual & Baseline Audiometric Testing Report was available for verification. Proper examination was conducted by Klinik TTMC Ayer Keroh on 14th, 18th and 25th August and 11th September 2020 for 22 workers. One more worker was confirmed to have retired. The JKKP 7 was form was raised and reported to JKKP.</p> <p>Noise Risk Assessment Report (Report No. HQ/09/PEB/00/67-2020/014) in compliance with Occupational Safety and Health (Noise Exposure) Regulations 2019 was available, conducted in the Mill by PAC Testing & Consulting Sdn. Bhd (HQ/09/PEB/00/67). The assessment was conducted on 19th May 2020. The</p>	
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		<p>recommendations and control measures have been reviewed by the management with an action plan.</p> <p>Medical Surveillance was conducted for 7 workers exposed to fumes in the mill on 17th and 18th February. A total of 6 of the workers were examined to be fit with no manganese trace in the samples. 1 worker were declared unfit as there were traces of manganese in the sample. The worker repeated the medical surveillance test on 2nd September 2020 and the results indicated the worker to be under Medical Removal Protection as there was Manganese traces in the sample. The Mill Management had transferred the worker to the workshop office as stated in the letter dated 21st September 2020.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The effectiveness of the H&S is monitored through the checklists available in the estates and mills via the Work Site Inspection. The findings of the WSI is submitted on a quarterly basis to the Head Quarters and also discussed at the quarterly OSH Meetings in the estates and mill for the attention of the management and further improvements. The estate and mills also have checklist to monitor the usage of PPE. OSH Training Programme are in place to ensure regular trainings are conducted in line with the HIRARC requirement.</p>	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>A training programme has been developed and available in the Training Requirement for Operating Units (Mills & Estate). The trainings were sighted to have included Gender Specific Training and involves staffs and workers.</p>	Complied

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		<p>Covid-19 training and briefings were sighted at the mill and estates. Interview with the workers and staff indicated that they were aware on the SOP during the RMCO such as social distancing, regular sanitization and use of PPE (Face Mask).</p>																								
<p>3.7.2</p>	<p>Records of training are maintained. - Minor Compliance -</p>	<p>Records of trainings were maintained by the Mill and all estates as below: -</p> <table border="1" data-bbox="1144 584 1917 1382"> <thead> <tr> <th data-bbox="1144 584 1337 683">Operating Unit</th> <th data-bbox="1337 584 1724 683">Training</th> <th data-bbox="1724 584 1917 683">Date</th> </tr> </thead> <tbody> <tr> <td data-bbox="1144 683 1337 1276" rowspan="7">Lanadron Estate</td> <td data-bbox="1337 683 1724 766">Spraying Technique and Safety Training</td> <td data-bbox="1724 683 1917 766">05.07.2020</td> </tr> <tr> <td data-bbox="1337 766 1724 849">Spraying Pump Technical Training by MYCROP</td> <td data-bbox="1724 766 1917 849">26.06.2020</td> </tr> <tr> <td data-bbox="1337 849 1724 932">Noise Risk Assessment Training</td> <td data-bbox="1724 849 1917 932">17.06.2020</td> </tr> <tr> <td data-bbox="1337 932 1724 986">Scout Harvesting Training</td> <td data-bbox="1724 932 1917 986">19.02.2020</td> </tr> <tr> <td data-bbox="1337 986 1724 1040">Scheduled Waste Training</td> <td data-bbox="1724 986 1917 1040">16.11.2019</td> </tr> <tr> <td data-bbox="1337 1040 1724 1123">Water management Irrigation Training</td> <td data-bbox="1724 1040 1917 1123">15.09.2020</td> </tr> <tr> <td data-bbox="1337 1123 1724 1193">Briefing on New policy & COBC</td> <td data-bbox="1724 1123 1917 1193">08.07.2020</td> </tr> <tr> <td data-bbox="1144 1276 1337 1382" rowspan="2">Pengkalan Bukit Estate</td> <td data-bbox="1337 1276 1724 1331">FFB Quality Training</td> <td data-bbox="1724 1276 1917 1331">02.10.2020</td> </tr> <tr> <td data-bbox="1337 1331 1724 1382">Circle Raking Training</td> <td data-bbox="1724 1331 1917 1382">01.09.2020</td> </tr> </tbody> </table>	Operating Unit	Training	Date	Lanadron Estate	Spraying Technique and Safety Training	05.07.2020	Spraying Pump Technical Training by MYCROP	26.06.2020	Noise Risk Assessment Training	17.06.2020	Scout Harvesting Training	19.02.2020	Scheduled Waste Training	16.11.2019	Water management Irrigation Training	15.09.2020	Briefing on New policy & COBC	08.07.2020	Pengkalan Bukit Estate	FFB Quality Training	02.10.2020	Circle Raking Training	01.09.2020	<p>Complied</p>
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			Inter Pump Training	28.08.2020
			Covid 19 Training	20.03.2020
			Spraying Techniques, Chemical handling and PPE	13.08.2020
			P&D Spraying Training	10.07.2020
			Planting Cassia (Beneficial Plant)	17.06.2020
			Spraying pump maintenance, Chemical Classification and Safety Data Sheet.	14.02.2020
			RSPO Training (MYNI 2019)	24.06.2020
			Recycling Training	08.10.2020
		Pagoh POM	Use of PPE at Work Place	06.01.2020
		COBC Training	10.01.2020	
		Hearing Conservation training	13.01.2020	
		First Aid Box Training	17.02.2020	
		Covid 19 Training	23.03.2020	
		Noise Risk Assessment	07.07.2020	
		LOTO System Training	06.08.2020	
Fire Fighting Training	15.08.2020			

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			Pictorial Working Instruction Training 21.08.2020 NODOPOD Training 21.09.2020 Pagoh Estate Tractor Driver & Safety Training 10.10.2020 Circle Spraying & Safety Training 07.10.2020 Scheduled Waste Management Training 07.10.2020 3R Recycle Bin Training 06.10.2020 Manuring Safety Training 02.10.2020 Townhall Safety & Health 27.08.2020	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor Compliance -	The mill has conducted a RSPO SCCS Refresher training for the Weighbridge Operators on 14.07.2020. The training was conducted based on the RSPO SCCS requirements and procedures.	Complied	
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)				
3.8.1	Identity Preserved Module 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.	Pagoh POM uses the Mass Balance Module as it's FFB are sourced from estates and FFB Collection Centres that are certified and uncertified against the RSPO P&C.	Not Applicable	

	<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>3.8.2</p>	<p>Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Pagoh POM receives certified FFB and uncertified FFB since June 2019. Therefore, qualifies for the Mass Balance Supply Chain System and module. During the RSPO assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p> <p>The list of FFB Suppliers are as below;</p> <table border="1" data-bbox="1137 863 1917 1329"> <thead> <tr> <th>FFB Supplier</th> <th>Certification</th> <th>Category</th> </tr> </thead> <tbody> <tr> <td>Lanadron Estate</td> <td>RSPO Certified</td> <td>SOU 19</td> </tr> <tr> <td>Pengkalan Bukit Estate</td> <td>RSPO Certified</td> <td>SOU 19</td> </tr> <tr> <td>Pagoh Estate</td> <td>RSPO Certified</td> <td>SOU 19</td> </tr> <tr> <td>Welch Estate</td> <td>RSPO Certified</td> <td>SOU 19</td> </tr> <tr> <td>Tangkah Estate</td> <td>RSPO Certified</td> <td>SOU 17 (Sister Estate)</td> </tr> <tr> <td>Muar River Estate</td> <td>RSPO Certified</td> <td>SOU 16 (Sister Estate)</td> </tr> </tbody> </table> <p>Non-Certified FFB Suppliers</p>	FFB Supplier	Certification	Category	Lanadron Estate	RSPO Certified	SOU 19	Pengkalan Bukit Estate	RSPO Certified	SOU 19	Pagoh Estate	RSPO Certified	SOU 19	Welch Estate	RSPO Certified	SOU 19	Tangkah Estate	RSPO Certified	SOU 17 (Sister Estate)	Muar River Estate	RSPO Certified	SOU 16 (Sister Estate)	<p>Complied</p>
FFB Supplier	Certification	Category																						
Lanadron Estate	RSPO Certified	SOU 19																						
Pengkalan Bukit Estate	RSPO Certified	SOU 19																						
Pagoh Estate	RSPO Certified	SOU 19																						
Welch Estate	RSPO Certified	SOU 19																						
Tangkah Estate	RSPO Certified	SOU 17 (Sister Estate)																						
Muar River Estate	RSPO Certified	SOU 16 (Sister Estate)																						

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		FFB Supplier	Certification	Category	
		Eng Huat Latex Concentrate Sdn. Bhd	Not Certified	Collection Centre	
		Impressive Transforms Sdn. Bhd	Not Certified	Estate (208.16 ha)	
		Koperasi Membeli Tanah Grisek Ledang	Not Certified	Collection Centre	
		Pembangunan Pertanian Melaka Sdn Bhd	Not Certified	Collection Centre	
		Sin Chin Joo Sdn Bhd	Not Certified	Collection Centre	
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 registration of PalmTrace is carried out by the GTM Department, HQ. All transaction are registered in the PalmTrace.			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: a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	Procedure namely Sime Darby Plantation – Plantation Quality Management System – Sustainable Plantation Management System; Appendix 15; Standard Operating Procedure (SOP) for Sustainability Supply Chain and Traceability; Version 2; Issue no.: 3; Issue date: Feb 2018. The procedure was established which covers responsibility, reporting of certified CPO/PK, non-conformance material, FFB			Complied

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	<ul style="list-style-type: none"> 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 implementation of this standard. 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>delivery Plantation to Mill, CPO/PK delivery Mill to customer, Record keeping, Training, Complaint Communication and Claim and etc.</p> <p>Training on Summary of New Changes in Sustainability Supply Chain and Traceability SOP: Sustainable Plantation Management System (SPMS) – Appendix 15; Plantation Sustainability and Quality Management Department date: 14/5/2018 by PSQM HQ personnel.</p> <p>The Mill Manager as Head of Operating Unit has the overall responsibility for the implementation of SOP and he may assign roles to relevant personnel or invite personnel from various departments necessary to assist in the SOP implementation. Sighted the identified and assigned suitable employees to implement and maintain the traceability system by management is En. Ahamad Junaidy Bin Jaapar (Assistant Engineer) – PIC for Sustainability Certification of Management Systems dated 15th January 2020.</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 within its organisation. 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 	<p>Internal audit conducted based on the SOP for Sustainable Supply Chain and Traceability of SPMS Appendix 15 (18: Internal Audit); Version 2; Issue # 5; Date: April 2019. The procedure conforms to the requirements in the RSPO SCCS.</p> <p>The latest Internal Audit for RSPO SCCS was done on 25th June 2020 conducted by SQM Central West Region. There were no NC raised during the Internal Audit. 1 OFI was raised on SCCS Compliances.</p>	Complied

	<p>review at least annually. The mill shall maintain the internal audit records and reports.</p>		
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>The daily records are prepared at the entry point at the weighbridge. When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in order the FFB to be received by the mill. Daily summary and monthly summary documented for all the certified FFB.</p> <p>The mill received FFB from sister estate with RSPO certified and purchased from the outside FFB supplier. The records of FFB received was recorded in FFB delivery/consignment note, FFB weighbridge ticket and summarize in Mass Balance sheet.</p> <p>The management will inform CB if there is any overproduction of certified tonnage. They aware on the overproduction as per stated in the procedure. Based on last review period, no overproduction recorded.</p> <p>Addressed in the SOP clause 11.0 Non-conforming Products and/or Documents. Based on the procedure, where there is contamination of RSPO certified material during receiving, processing, storage and dispatch, the mill shall downgrade the materials in such order: IP to MB to conventional.</p> <p>Material received with insufficient information shall be treated as non-conforming documents. The documents shall be investigated, verified and corrected in order to allow processing of material. Authorization for release shall be by the mill manager.</p> <p>E.g. of information available in the mill's weighbridge tickets is as follows:</p>	<p>Complied</p>

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		<ol style="list-style-type: none"> 1. Weighbridge ticket no.:152101 <ul style="list-style-type: none"> • FFB delivery note: 323588 • Receiving Ticket: Perniagaan Pertanian Hup Seng Guan (010446). • Name of estates Eng Huat Latex Concentrate (Non-RSPO) • Vehicle no. JJA4674 • Field/Year of planting: 2007 • Date: 13/10/2020 • Remark: L/F200 • Net weight: 7630 kg 2. Weighbridge ticket no.: 152165 <ul style="list-style-type: none"> • Name of estate: E022-E-Pagoh • Field No.: Division Craigielea Estate (2013C) • Vehicle no.: MBX2523P20 • Date: 14/10/2020 • Total bunches: 1100 bunches • Seal no.: 127770 • Net weight:13,280 kg 	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>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> <ol 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; 	<p>Pagoh POM ensured the required information is available in document form. Sampled of CPO contract: S/C-PSD/2008/CPO0042 dated 09/06/2020, quantity 500 mt (shipment month: Aug 2020).</p> <ul style="list-style-type: none"> • The name and address of the buyer: SDP Nuri. • The name and address of the seller: KKS Pagoh, Muar, Johor • The loading or shipment/ delivery date: Aug 2020. <p>e.g. Weighbridge ticket: 012370</p> <ul style="list-style-type: none"> • The date on which the documents were issued: 08/08/2020 • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Palm Oil (CPO) RSPO MB. 	<p>Complied</p>

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	<p>e) RSPO certificate number;</p> <p>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</p> <p>g) The quantity of the products delivered;</p> <p>h) Any related transport documentation;</p> <p>i) A unique identification number.</p>	<ul style="list-style-type: none"> • The quantity of the products delivered; e.g. 39.88 mt • Any related transport documentation; e.g. 110: Teo Tuan Kwee Sdn Bhd • Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 600305 • A unique identification number: contract no. • Available in a few forms e.g. DN no., seal no., etc. 	
<p>3.8.9</p>	<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</p>	<p>No bulking facilities outsourced by the mill. Transporter for CPO is handled by mill and PK was assigned by GTM.</p> <p>Agreement for Teo Tuan Kwee sighted dated on 01/08/2020 – 31/10/2020. The terms and condition spell out the legal ownership is by Sime Darby Pagoh POM, obligations toward workmen, employees, servants and/or agents, law, regulations, directives and standard operating procedures on COVID 19 Pandemic.</p> <p>There is an agreement signed on 17/06/2019 by Teo Tuan Kwee on the permission to be audited by RSPO/MSPO Auditor</p>	<p>Complied</p>

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	operations, systems, and all information, when this is announced in advance.		
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.	The names and contact details of all contractors used for the physical handling of RSPO certified oil palm products were available in the mill. Among the detail recorded were : - Contractor Teo Tuan Kwee Sdn Bhd (CPO Transporter)	Complied
3.8.11	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.	There were no new contractors used for the physical handling of RSPO certified products by the Mill.	Complied
3.8.12	<p>Record keeping</p> <p>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.</p> <p>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.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>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>Pagoh Palm Oil Mill has established SOP for Sustainable Supply Chain and Traceability, version :2 Issue No:5, Dated April 2019 Pagoh POM ensured the required information is available in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); <p>As spelt out in its supply chain procedure, Clause 5.4, records are to be maintained for a minimum period of three (3) years).</p> <p>Pagoh POM is using the Mass Balance module and all the FFB received, processed and CPO & PK dispatch is recorded in dispatch book and balance in the Mass Balance Sheet with 3 monthly accounting period.</p>	Complied

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	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.	Based on the Mass Balance sheet, the stock for CPO & PK is positive stock within past 12 months.	
3.8.13	Extraction Rate 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.	The extraction rate for mill is calculated in daily production detail report. Conversion factor of CPO and PK production is depending on the actual OER and KER. Last year's average were 20.64% (OER) & 4.08% (KER).	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	Pagoh POM is using mass balance module, therefore this clause is not applicable.	Not Applicable
3.8.16	Registration of Transactions 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.	The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Based on the announcement summary, all the registrations were found to be in order. No RSPO volume sold for other scheme. RSPO certified volume only downgraded to conventional CPO/PK.	Complied
3.8.17	Claims	The facility is using the actual extraction rate and therefore updating of rates is not necessary. RSPO trademark was not use.	Complied

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	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.	Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	
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.	Not Applicable as corporate communication is managed at Sime Darby Plantation Berhad HQ level.	Not Applicable
4.2	In corporate communications a member is allowed to: 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. 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.	Not Applicable as corporate communication is managed at Sime Darby Plantation Berhad HQ level.	Not Applicable
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 corporate communication is managed at Sime Darby Plantation Berhad HQ level.	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 corporate communication is managed at Sime Darby Plantation Berhad HQ level.	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.	Not Applicable as corporate communication is managed at Sime Darby Plantation Berhad HQ level.	Not Applicable
Business to business communications			

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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.	Not Applicable as business to business communication is managed at Sime Darby Plantation Berhad HQ level.	Not Applicable
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.	Not Applicable as business to business communication is managed at Sime Darby Plantation Berhad HQ level.	Not Applicable
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 that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	Not Applicable as business to business communication is managed at Sime Darby Plantation Berhad HQ level.	Not Applicable
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.	Not Applicable as the facility does not involve with consumer end product.	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.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable

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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.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Not Applicable as the facility does not involve with consumer end product.	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.	Not Applicable as the facility does not involve with consumer end product.	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.	Not Applicable as the facility does not involve with consumer end product.	Not Applicable
6.8	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	Not Applicable as the facility does not involve with consumer end product.	Not Applicable

	applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org .		
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	The facility declares its MB certified CPO & PK production through mass balance accounting. Based on verification of MB accounting, there was no over declare found.	Complied
	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.	Not Applicable as the facility declares its MB certified CPO & PK production through mass balance accounting. Based on verification of MB accounting, there was no over declare found.	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 	Not Applicable as the facility does not use RSPO trademark label.	Not Applicable

	<p>trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).</p> <ul style="list-style-type: none"> 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. 		
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. <p>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> <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>Not Applicable as the facility does not use RSPO trademark label.</p>	<p>Not Applicable</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</p>	<p>SDPB has implemented a Sime Darby's Human Rights Charter where they committed to recognizing the role of Human Rights Defenders in accordance to the United Nations declaration on Human Rights Defender.</p>	<p>Complied</p>

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	<p>unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights. The policy was communicated through the muster briefing/training to workers as below:</p> <ul style="list-style-type: none"> • Lanadron Estate: 08/07/2020. • Pengkalan Bukit Estate: 09-12/09/2020. • Pagoh POM: 17/01/2020. • Pagoh Estate: 27/08/2020. <p>It was also communicated to the external stakeholder through stakeholder consultation and company website.</p>	
<p>4.1.2</p>	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>SDPB has implemented Group Sustainability and Quality Policy Statement dated 02 Dec 2019 where the management is committed to contributing to a better society:</p> <ol style="list-style-type: none"> 1. Respecting, upholding & no-exploitation of fundamental human rights. 2. Providing safe and healthy workplaces and protecting workers' welfare. 3. Engaging and empowering communities. <p>This is demonstrated by the certification unit where no harassment or violence occurred or reported by the workers.</p>	<p>Complied</p>
<p>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</p>			
<p>4.2.1</p>	<p>(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 whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p>	<p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</p> <p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated</p>	<p>Complied</p>

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	- Critical (Major) compliance -	01/11/2008 documented the process for handling communication regarding social issues. Under Sime Darby website, there is Whistleblowing e-form provide a mechanism for reporting, investigating and remedying any wrongdoing.	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	The policy was communicated through the muster briefing/training to workers as below: <ul style="list-style-type: none"> • Lanadron Estate: 08/07/2020. • Pengkalan Bukit Estate: 09-12/09/2020. • Pagoh POM: 17/01/2020. • Pagoh Estate: 27/08/2020. 	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	Sighted the External Complaint Book have the agreed resolution within timeframe. There was no other major complaint other than housing maintenance issues. Sample taken as below: <ol style="list-style-type: none"> 1. Lanadron Estate: Complaint resolve through the NUPW as the mediator. Sighted the NUPW minute of meeting dated 09/07/2020. The complaints were about the termination benefits of 6 workers who don't want to move to other division housing due to property taken over. 2. Pengkalan Bukit Estate: Complaint book available. Most of the complaint is regarding the housing repairs and solved within 1 week. Sighted house number 100B (Md Alam) complaint on the pipe damaged on 10/10/2020 and solved on 12/10/2020. 3. Pagoh POM: Electrical failure form and housing repair complaint are available. Record of complaints for stakeholder FY 2020. Sample the complaint: high admixture 	Complied

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		<p>in Kernel Dispatch Lorry JPH 7147. Completion date is 09/03/2020.</p> <p>4. Pagoh Estate: Mainly complaint is come from Housing repairs. No other complaint received.</p>	
4.2.4	<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>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow.</p>	Complied
Criterion 4.3: 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>Pagoh POM certification unit have contributed to the internal and external stakeholders.</p> <p>As a group, the CSR was included in: http://www.yayasansimedarby.com/our-projects/community-health</p> <p>For example, the management has contributed and supported the activities such as request as below: Lanadron Estate:</p> <ul style="list-style-type: none"> • Covid-19 response fund to klinik Grisek on 28/04/2020. • Bushes removed on 16/07/2020. <p>Pengkalan Bukit Estate:</p> <ul style="list-style-type: none"> • Clean water supply to Kampung Panjang Sari dated 01/10/2020. 	Complied

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		<ul style="list-style-type: none"> Assistance to clean the desilting the drain to Kampung Panjang Sari on 01/10/2020. <p>Pagoh POM:</p> <ul style="list-style-type: none"> Sambutan Maulidur Rasul Bersama Kg Paya Panjang & Pagoh POM/Pagoh Estate dated 06/03/2020. Kenduri Perdana & Doa Selamat dated 07/02/2020. Fishing competition for employees on 12/01/2020. <p>Pagoh Estate:</p> <ul style="list-style-type: none"> Contribution to PIBG SK Paya Panjang RM 150 dated 09/08/2019, Permission to have the engagement ceremony at housing complex on 28/07/2020. 	
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.			
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>All land title was kept in the office and available for review.</p> <p>Lanadron Estate: Previous landowner is Golden Hope Plantation and merged with Sime Darby on 2008. Mill land ownership is under Pagoh Estate, within the plot title no. 93881, Lot 2159.</p> <p>Pengkalan Bukit Estate: The estate holds 55 land titles. The quit rent payment was done accordingly as requirement from the state government. Sighted the payment advice for FY 2020 available for review. Refer payment</p>	Complied

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voucher no. MBB 080751 amounted RM 138,500.00. Sighted the sampled land titles as follow:

Grant No	Lot no	Hectare
GRN 490834	4384	90.99
GRN 486793	6356	536.4780
HSD 25769	5776	13.2400
GRN 49925	5452	816.84

Lanadron Estate:

The estate holds 13 land titles. The quit rent payment was done accordingly as requirement from the state government. Sighted the payment advice for FY 2020 available for review. Refer payment voucher no. BR10/04-2019. Sighted the sampled land titles as follow:

Grant No	Lot no	Hectare
H.S.(D) 3285	PTD 7517	42.1148
H.S.(D) 3834	PTD 7518	603.0638
H.S.(D) 3841	PTD 7259	15.8004
H.S.(D) 3818	PTD 11995	565.1149

Pagoh POM & Pagoh Estate:

The estate holds 30 land titles. The quit rent payment was done accordingly as requirement from the state government. Sighted the payment advice for FY 2020 available for review. Refer payment voucher no. MBB Cheque no: 005239. Sighted the sampled land titles as follow:

Grant No	Lot no	Hectare
GRN 89107	28	407.5184
GRN 121983	51	318.0824
GRN 99678	1799	45.9823

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 in SOU 19 Pagoh POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	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 -	There is no land dispute in SOU 19 Pagoh POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	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. - Minor compliance -	There is no land dispute in SOU 19 Pagoh POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
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 in SOU 19 Pagoh POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	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 -	There is no land dispute in SOU 19 Pagoh POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied

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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 in SOU 19 Pagoh POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	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 in SOU 19 Pagoh POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There is no land dispute in SOU 19 Pagoh POM certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
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.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	Not Applicable as no new plantings at all the sampled estates.	Not Applicable
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	Not Applicable as no new plantings at all the sampled estates.	Not Applicable

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>	Not Applicable as no new plantings at all the sampled estates.	Not Applicable
4.5.4	<p>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.</p> <p>- Minor compliance -</p>	Not Applicable as no new plantings at all the sampled estates.	Not Applicable
4.5.5	<p>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.</p> <p>- Minor compliance -</p>	Not Applicable as no new plantings at all the sampled estates.	Not Applicable
4.5.6	<p>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.</p> <p>- Minor compliance -</p>	Not Applicable as no new plantings at all the sampled estates.	Not Applicable
4.5.7	<p>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.</p> <p>- Minor compliance -</p>	Not Applicable as no new plantings at all the sampled estates.	Not Applicable

4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	Not Applicable as no new lands acquired at all the sampled estates.	Not Applicable
<p>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.</p>			
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>There is no native and customary right land in SOU 19 (Pagoh POM Certification Unit).</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>There is no native and customary right land in SOU 19 (Pagoh POM Certification Unit).</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
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p>	<p>There is no native and customary right land in SOU 19 (Pagoh POM Certification Unit).</p>	Complied

	- Minor compliance -	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.	
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	There is no native and customary right land in SOU 19 (Pagoh POM Certification Unit). 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.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	SDPB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied

	- Critical (Major) compliance -		
4.7.3	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. - Minor compliance -	SDPB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Complied
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.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	SDPB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	SDPB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Complied

4.8.4	<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>There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.</p>	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
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>Prices paid for FFB are stated in the Schedule 3 of the Contract Agreement between SDP and the FFB Suppliers. All FFB suppliers have a copy of the contract agreement for their reference. Any discrepancies of weight or prices paid can be brought forward to the mill management through the grievance procedures that have been in place.</p> <p>Current and previous period prices are also publicly displayed at the weighbridge office for the reference of the FFB suppliers.</p> <p>MPOB Monthly Average and Mill OER & KER is used to determine the prices of FFB for payment to the FFB Suppliers.</p>	Complied
5.1.2	<p>(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).</p> <p>- Critical (Major) compliance -</p>	<p>There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019. Nevertheless, the FFB suppliers understand the pricing of FFB which is in accordance to the MPOB Monthly Average for CPO and PK. Interview with the FFB Suppliers indicate that they are aware on the pricing mechanism of KKS Pagoh.</p>	Complied
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>Pricing is based on the MPOB Monthly Average Price for CPO and PK and the OER and KER awarded by KKS Pagoh. This was affirmed by verifying the Self Billed Invoice to the FFB Suppliers.</p>	Complied

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5.1.4	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.</p>	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Pagoh Mill ensures that all Outsider FFB suppliers are provided with a fair, legal and transparent contract agreement. Sampled the contract agreement as below;</p> <p>i) Agreement Number: P/P/0220/FFB01597L FFB Supplier: Eng Huat Latex Concentrate Sdn Bhd Contract Period: 01.02.2020 – 31.12.2020</p> <p>ii) Agreement Number: P/P/0619/FFB01474L FFB Supplier: Pembangunan Pertanian Melaka Sdn Bhd Contract Period: 01.01.2020 – 31.12.2020</p>	Complied
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Pagoh Mill ensures that all agreed payments to its Outsider FFB Suppliers are in a timely manner in accordance to the contract agreement which is on or before the 10th day of the following month. Payments are done every 30 days. Verified the payment details as below;</p> <p>Supplier: Eng Huat Latex Concentrate Sdn. Bhd. Invoice Number: P/AFVCH-200263 Invoice Date: 30 Sept 2020 Contract Number; 1 Sept 2020 – 30 Sept 2020 Contract Date: 31 Aug 2020</p>	Complied

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		Remit To: Eng Huat Concentrate Sdn Bhd Maybank Islamic Total Amount Including SST: RM 91, 443.28	
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). - Minor compliance -	The Mill conducts regular calibration on their weighbridges used to determine the FFB tonnage for all FFB suppliers. Latest Calibration was done on 08.12.2019; Safety Tag Number (ATK(E) IND 560 60, 000 kg x 10 kg); 2.1K Q 016941 by metrology Corporation Malaysia Sdn Bhd.	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Not Applicable
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 -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Not Applicable
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 -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Not Applicable
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 competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Not Applicable

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	- Minor compliance -		
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Not Applicable
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 -	SDPB has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02nd December 2019. The policy shall be guided by the commitments spelt out in the Company's in Human Rights Charter (HRC) where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.	Complied
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. - Critical (Major) compliance -	Migrant workers are recruited with (2+1) and 3 years contract. Local workers are on a long-term employment. No any kind of discrimination was noted. Job opportunities and amenities such as free housing, subsidized water and electricity supplies, and medical care are given to all employees without discrimination.	Complied

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		<p>Foreign migrant workers. Refer to Letter of Employment, Employment Contract para" 14 – Annual leave: 14 days for < 5 years and 16 days for > 5 years.</p> <p>Overtime paid as per Employment Act 1995 (EA). Sampled workers are as 6.5.1.</p>	
6.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>There is no any discrimination based on religion, gender, nationality etc., during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting.</p> <p>Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste.</p>	Complied
6.1.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Pregnancy test conducted in Pagoh Certification Unit only when the female worker seeks Medical Assistant for treatment. If the workers confirmed pregnant, Medical Assistant will issue a recommendation letter to Assistant Manager for work change to light work and not involved in any chemical. Confirmed through the interview session to workers, Medical Assistant and Gender Committee Minute of Meeting.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly. SDPB has implemented Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability & Quality Management (PSQM) Department. It explained the types of gender-based violence & grievance procedures. Meetings were conducted quarterly according to the handbook. Gender Committee were established by the mill and estates management.</p>	Complied

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		<p>The meetings were conducted at respective units as below:</p> <ul style="list-style-type: none"> • Lanadron Estate: 21/07/2020 & 21/01/2020. There is a memo on Gender meeting cancellation on April 2020 due to COVID-19. • Pengkalan Bukit Estate: 18/09/2020, 19/06/2020 and 09/03/2020. • Pagoh POM: 14/08/2020, 19/06/2020 and 19/02/2020. • Pagoh Estate: 09/07/2020 & 19/02/2020. There is a memo on Gender meeting cancellation on April 2020 due to COVID-19. 	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>There is no any discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting.</p> <p>Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste.</p>	Complied
<p>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).</p>			
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>All the workers are under direct employment and some electrical works are under contractor workers. The pay slip has included basic income, allowance pay, working days, medical leave, deduction of salary and etc. as per employment contract.</p> <p>It is explained to the workers in the workers with the assistance of the senior worker from the same country during arrival through the induction training. Sighted the record of induction training to foreign workers as below:</p>	Complied

		<p>Sighted the pay slip for employees (March, April and May 2020): as below:</p> <p>Lanadron Estate:</p> <ul style="list-style-type: none"> • Employee ID: 0000108543 • Employee ID: 0000155849 • Employee ID: 0000157750 • Employee ID: 0000114621 • Employee ID: 0000050942 <p>Pengkalan Bukit Estate:</p> <ul style="list-style-type: none"> • Employee ID: 0000011775 • Employee ID: 0000055666 (Mohd Firdaus-Surau Deduction without JTK Permit – RM 2). • Employee ID: 0000101220 • Employee ID: 0000123616 • Employee ID: 0000102028 • Contractor employee: Passport no: C5726483 (Hayati Enterprise Sdn Bhd) • Contractor employee: IC no: 811128-01-xxxx (Hayati Enterprise Sdn Bhd) <p>Pagoh POM:</p> <ul style="list-style-type: none"> • Employee ID: 0000086340 • Employee ID: 0000086600 • Employee ID: 0000102552 • Employee ID: 0000130722 	
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		<ul style="list-style-type: none"> • Employee ID: 0000154321 • Contractor employee: (Osman M Ritha-Lotus Two Enterprise) • Contractor employee: (Md Sulaiman Khan-Lotus Two Enterprise) <p>Pagoh Estate:</p> <ul style="list-style-type: none"> • Employee ID: 0000011589 • Employee ID: 0000099691 • Employee ID: 0000140860 • Employee ID: 0000115277 • Employee ID: 0000149789 	
<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>All workers have the employment contract stated the regular working hours (8 hours for daily rate) and piece rates by works as per Employment Act 1955. Sighted the employment contract for employee March, April and May 2020:</p> <p>Lanadron Estate:</p> <ul style="list-style-type: none"> • Employee ID: 0000108543 • Employee ID: 0000155849 • Employee ID: 0000157750 • Employee ID: 0000114621 • Employee ID: 0000050942 <p>Pengkalan Bukit Estate:</p> <ul style="list-style-type: none"> • Employee ID: 0000011775 	<p>Complied</p>

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		<ul style="list-style-type: none"> • Employee ID: 0000055666 • Employee ID: 0000101220 • Employee ID: 0000123616 • Employee ID: 0000102028 • Contractor employee: Passport no: C5726483 (Hayati Enterprise Sdn Bhd) • Contractor employee: IC no: 811128-01-xxxx (Hayati Enterprise Sdn Bhd) <p>Pagoh POM:</p> <ul style="list-style-type: none"> • Employee ID: 0000086340 • Employee ID: 0000086600 • Employee ID: 0000102552 • Employee ID: 0000130722 • Employee ID: 0000154321 • Contractor employee: (Osman M Ritha-Lotus Two Enterprise) • Contractor employee: (Md Sulaiman Khan-Lotus Two Enterprise) <p>Pagoh Estate:</p> <ul style="list-style-type: none"> • Employee ID: 0000011589 • Employee ID: 0000099691 • Employee ID: 0000140860 • Employee ID: 0000115277 • Employee ID: 0000149789 	
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<p>6.2.3</p>	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>The paid salary sighted for Pagoh POM Certification Unit for March, April and May 2020 were complied with the Minimum Wage Order 2019 (for all workers) and Minimum Wage Order 2020 (for workers in town, if applicable).</p> <p>Sighted the pay slip for employees as below:</p> <p>Lanadron Estate:</p> <ul style="list-style-type: none"> • Employee ID: 0000108543 • Employee ID: 0000155849 • Employee ID: 0000157750 • Employee ID: 0000114621 • Employee ID: 0000050942 <p>Pengkalan Bukit Estate:</p> <ul style="list-style-type: none"> • Employee ID: 0000011775 • Employee ID: 0000055666 • Employee ID: 0000101220 • Employee ID: 0000123616 • Employee ID: 0000102028 • Contractor employee: Passport no: C5726483 (Hayati Enterprise Sdn Bhd). • Contractor employee: IC no: 811128-01-xxxx (Hayati Enterprise Sdn Bhd) <p>Pagoh POM:</p> <ul style="list-style-type: none"> • Employee ID: 0000086340 • Employee ID: 0000086600 	<p>Complied</p>
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		<ul style="list-style-type: none"> • Employee ID: 0000102552 • Employee ID: 0000130722 • Employee ID: 0000154321 • Contractor employee: (Osman M Ritha-Lotus Two Enterprise) • Contractor employee: (Md Sulaiman Khan-Lotus Two Enterprise). <p>Pagoh Estate:</p> <ul style="list-style-type: none"> • Employee ID: 0000011589 • Employee ID: 0000099691 • Employee ID: 0000140860 • Employee ID: 0000115277 • Employee ID: 0000149789 	
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 (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>The basic amenities and facilities at the quarters provided by the company to the workers includes electricity, water and domestic waste disposal. Electricity and water were supplied with free of charge.</p> <p>Seen the Budget for housing repairs, sanitation, garden upkeep and 5-years CAPEX & OPEX 2020 from all operating units.</p> <p>Seen the record for weekly line site inspection done by Medical Assistant in Weekly basis. For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2 people per room. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utilizes).</p>	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>The nearest town are Pagoh (10 km) or Muar (28 km). Otherwise, the accessibility to the grocery and shops is available in housing area.</p>	Complied
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>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 endeavour 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 (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils 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 (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</i></p>	<p>Sime Darby Plantation Berhad-Pagoh POM has provided the decent living wage for both local and foreign workers based on PREVAILING WAGES assessment. It includes wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc. The payslip sighted in clause 6.2.1 showed that the salary received complied with the minimum wage order 2020 and the decent living wage set up by the group which is foreign worker is RM 20145.15/worker and local RM1944.47/worker (housing basket: RM 45.86/foreign worker/4 Pax/house).</p>	Complied

	<p><i>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 used as the foundation for the gradual implementation of the living wage payment • 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>There are no casual workers hired in Pagoh POM and supply bases. All employees are permanent employee (for locals) and contracted employee (for foreign workers). All permanent and full-time employment or contract workers used as the general worker, mandore, staff, etc. based on their employment contract sighted in clause 6.2.2.</p>	Complied
<p>Criterion 6.3: 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>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below: We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p>	Complied

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		<ul style="list-style-type: none"> • Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. • Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. <p>Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively.</p> <p>During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join the SPIEU.</p>	
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>Joint discussion with NUPW dated 09/07/2020 (Lanadron Estate), 08/06/2020 (Pagoh POM) and 02/07/3030 (Pagoh Estate) involved the representative from employer and employee available. Issues discussed as below:</p> <ul style="list-style-type: none"> • Lanadron Estate: Request for termination benefit. 6 workers from Panchor to request to extend the stay at Panchor Division until December 2020. • Pengkalan Bukit Estate: Request on the lamp & socket repair at worker’s housing, changing old roof to new roof progressively at 10 houses. • Pagoh POM: Street light not functioning from AP post to estate junction. Difficulties for workers who want to go home at night. • Pagoh Estate: No other issue. The awareness on COVID 19 SOP to be applied. If there is any complain, Manager ask worker to write down the issues on small chit for recording and monitoring in house repair books. 	Complied

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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>Based on the worker’s interview, the selection of NUPW representative made from the election among the NUPW member without management interference. Foreign workers included in the committee formation and appointment letter sighted.</p> <p>Sampled below appointment letter:</p> <ul style="list-style-type: none"> • Lanadron Estate: Letter from NUPW dated 20/09/2018, chairman: Mahmud bin Khamis, committee member: Kaliamar, Noreha and Ratha. • Pengkalan Bukit Estate: Letter from NUPW dated 19/04/2018, chairman: Mohamad Jafriudin, committee member: Ajemah & Jasmiah. • Pagoh POM: Letter from NUPW dated 23/02/2018, chairman: Mohd Senin bin Sapan, committee member: Khalid bin Atan. • Pagoh Estate: Letter from NUPW dated 01/02/2018, chairman: Ratha a/l Gopal & Rosidah Yunos. <p>The selection also based on the election meeting. This is further confirmed by the interview session.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
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>- Minor compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> • Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. 	Complied

		<ul style="list-style-type: none"> • Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. • Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations. • Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the wellbeing of our communities. • Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognise that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use. • Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees. • Protecting the Rights of Children: We seek to promote the wellbeing of children and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography. <p>Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired.</p> <p>For contractors, the clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC dated 21/06/2020, Human Rights Charter-protecting the rights of children.</p>	
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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>The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liason & Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).</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 is no young worker employed in Pagoh POM and Estate certification unit.</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 unit of certification has communicated the Human Right Charter, Social Policy and Vendor COBC through the stakeholder meeting and muster briefing.</p>	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<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.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> • Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims. • Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation. 	Complied

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		The policy was communicated through the Gender Committee meeting.	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	SDPB has implemented Social Policy, Gender Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy was displayed on the notice board which was accessible by the workers. Briefing of the policies was conducted during morning muster and the policies was displayed at the notice board outside the office.	Complied
6.5.3	<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>The assessment for needs for new mother was conducted by Gender Committee. There were new mothers needs as sampled below:</p> <ul style="list-style-type: none"> • Lanadron Estate: 09/07/2020 – Only 1 new mother which is Lasuzlizan (Medical Assistant). No new needs as the baby is taken care by mother in law at Kg Hujung Tambak, Gersik. • Pengkalan Bukit Estate: 18/09/2020 – There is no new mother in Pengkalan Bukit Estate as assessed by Gender Committee Chairman. • Pagoh POM: 26/07/2020 - There is no new mother in Pagoh POM as assessed by Gender Committee Chairman. • Pagoh Estate: 25/06/2020 - There is no new mother in Pagoh POM as assessed by Gender Committee Chairman. 	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>	Gender committee has been formed in each unit for the medium of sexual harassment grievances by female.	Complied

Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Passport was kept by the management voluntarily. There is agreement letter signed by worker and employer on the safekeeping passport at office. If the workers want to obtain the passport for own usage, they can anytime request for it. This is further confirmed through interview session with workers.</p> <p>There is no contract substitution as the employment contract signed between Sime Darby and embassy of Indonesia was same with the employment contract signed between worker and estate/mill.</p> <p>Based on the workers interview, the overtime was given voluntarily if any work offered.</p> <p>The termination of service clearly stated that the termination of employment if:</p> <ol style="list-style-type: none"> 1. The company is not satisfied with your performance 2. You end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term. 3. You commit any misconduct, including theft, fraud, insubordination, negligence or any other form of crime. 4. You have breached any express or implied terms of your employment. 5. Fail medical examination based on FOMEMA result. 	Complied
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB has implemented a Sime Darby's Human Rights Charter on where they committed as below:</p> <ol style="list-style-type: none"> a. Providing equal opportunity b. Respecting freedom of association 	Complied

		<p>c. Eradicating any form of exploitation d. Ensuring favourable working conditions e. Enhancing Safety and Health</p> <p>They also provided awareness and training to all the foreign workers for them to understand their responsibility in respect of human rights as included in the Group Sustainability Policy on</p> <p>For eg: All the workers have provided with induction training in based estate during their arrival to Malaysia.</p>	
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<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>Lanadron Estate</p> <ul style="list-style-type: none"> The management have appointed the Estate Manager Mr. Mohd. Syamsuddin Bin Mahmood as the Chairman of the JKKP for Lanadron Estate. Sighted the appointment letter dated 3rd January 2019 undersigned by the Regional CEO. Regular meetings were conducted every 3 months to discuss Health and Safety Issues. Sighted JKKP Meeting Minutes dated 17.07.2020 (02/2020), 24.01.2020 (01/2020). <p>Pengkalan Bukit Estate</p> <ul style="list-style-type: none"> The management have appointed the Estate Manager Mr. Mohd. Senin Bin Sumrin as the Chairman of the JKKP for Pengkalan Bukit Estate. Sighted the appointment letter dated 1st February 2016 undersigned by the Regional CEO. 	Complied

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		<ul style="list-style-type: none"> Regular meetings were conducted every 3 months to discuss Health and Safety Issues. Sighted JKPP Meeting Minutes dated 11.09.2020 (03-FY2020), 26.06.2020 (02/FY-2020), 06.03.2020 (01-FY2020) <p>KKS Pagoh</p> <ul style="list-style-type: none"> The management have appointed the Mill Manager Tn. Mohd Fadzil Bin Hasbullah the Chairman of the JKPP for KKS Pagoh. Sighted the appointment letter dated 1st January 2020 undersigned by the Regional General Manager, Central West. Regular meetings were conducted every 3 months to discuss Health and Safety Issues. Sighted JKPP Meeting Minutes dated 17.08.2020 (03-2020), 18.05.2020 (02-2020), 25.02.2020 (01-2020). <p>Pagoh Estate</p> <ul style="list-style-type: none"> The management have appointed the Estate Manager Mr. Rosli Bin Mohamad as the Chairman of the JKPP for Pagoh Estate. Sighted the appointment letter dated 11th June 2019 undersigned by the Regional CEO, Central West. Regular meetings were conducted every 3 months to discuss Health and Safety Issues. Sighted JKPP Meeting Minutes dated 08.10.2020 (04-2020), 13.07.2020 (03-2020), 17.01.2020 (01.2020). JKPP Meeting for 02-2020 was cancelled due to the MCO Period. 	
6.7.2	<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</p>	<p><u>Lanadron Estate</u> Accident and emergency procedures were available and sighted at the Office and Workshop. There is a formation of ERP Team & ERP for all the identified incidences (Evacuation, Evacuation – Confined Space, Fire Fighting & Spillage or Overflow). The ERP Team was</p>	<p style="text-align: center;">Non-compliance</p>

	<p>equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>appointed, and the organizational chart was displayed at the notice board together with the emergency contacts. Fire Drill Training was conducted on 20.08.2020 by BOMBA</p> <p>There were 7 accident cases reported for the year 2019. The JKKP 8 has been submitted to JKKP on 20.05.2020. There was a total of 13 accident cases for the year 2020 with all records categorized as minor accidents with less than 5 days MC. Records were all well maintained in the estate.</p> <p><u>Pengkalan Bukit Estate</u></p> <p>Accident and emergency procedures were available and sighted at the Office and Workshop. There is a formation of ERP Team & ERP for all the identified incidences (Evacuation, Evacuation – Confined Space, Fire Fighting & Spillage or Overflow). The ERP Team was appointed, and the organizational chart was displayed at the notice board together with the emergency contacts. Fire drill and Fire Training was conducted for all workers on 26.08.2020. Evacuation Drill was conducted on 24th Sept 2019.</p> <p>The first aid box was sampled for the Spraying Gang, Water Treatment Plant Attendant/Nursery Mandore and Chemical Store. The First Aid boxes were found to be as below:</p> <ol style="list-style-type: none"> 1. The First Aid items in the First Aid Box were insufficient. There were less items in the box compared to the First Aid Items list that was in the box. 2. The First Aid items in the box were not labelled. (Acviflavine Lotion, Analgesic Cream) 	
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		<p>3. The First Aid items in the box had no expiry date. (Acviflavine Lotion, Analgesic Cream)</p> <p>4. Issues and Replenishment were not recorded in the first aid kit.</p> <p>The sampled first aid box holders (Spraying Mandore & Nursery Mandore) were not trained on the procedure to use the first aid box. Sighted the First Aid Training dated 14.07.2020 did not include the sampled first aid kit holders. Interview with the mentioned workers indicated that they were not aware on how to use the items in the First Aid Kit items. Hence a minor nonconformity was raised.</p> <p>Accident records were maintained and reported to HQ as and when there are incidents that happen in the estate. A total of 2 accidents have been reported for the year 2020 as of to date. The accident investigation has been done for both accidents. The JKPP Form for year 2019 has been submitted by the management to JKPP with the documents available for verification.</p> <p><u>Pagoh POM</u></p> <p>Accident and emergency procedures were available and sighted at the Office and the Mill. There is a formation of ERP Team & ERP for all the identified incidences (Evacuation, Evacuation – Confined Space, Fire Fighting & Spillage or Overflow). The ERP Team was appointed, and the organizational chart was displayed at the notice board together with the emergency contacts. Fire Drill Training was conducted on 15.08.2020.</p> <p>Workers trained in First Aid were present in the Mill operations. The mill has 9 trained First Aid Box Holders. All holders have been trained on Basic Occupational First Aid Box handling on 17.02.2020.</p>	
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		<p>There were 3 accident cases reported for the year 2019. The JKKP 8 has been submitted to JKKP on 23.01.2020. There was a total of 5 accident cases for the year 2020 with 4 records categorized as non-occupational and 1 categorized as Occupational Minor Injury involving the Thresher Station. The Hirarc has been reviewed and workers have been retrained accordingly.</p> <p>Pagoh Estate</p> <p>Accident and emergency procedures were available and sighted at the Estate Office and the Muster Ground. There is a formation of ERP Team & ERP for all the identified incidences (Evacuation, , Fire Fighting & Spillage or Overflow & Flood). The ERP Team was appointed, and the organizational chart was displayed at the notice board together with the emergency contacts. Fire Drill Training was conducted on 21.07.2020</p> <p>There were 9 accident cases reported for the year 2019. The JKKP 8 has been submitted to JKKP on 31.01.2020. There was 1 accident case for the year 2020 categorized as occupational and 1 categorized as Occupational Temporary Dissability involving the Tractor Driver. The Hirarc has been reviewed and workers have been retrained accordingly.</p>	
6.7.3	<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</p>	<p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was</p>	Complied

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	<p>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>sighted that all required appropriate PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</p>																									
<p>6.7.4</p>	<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>Medical care is provided to all the employees. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for July 2020, August 2020, September 2020 for all estate visited as below.</p> <table border="1" data-bbox="1137 767 1930 1345"> <thead> <tr> <th>Operating Units</th> <th>Month</th> <th>Amount (RM)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Pagoh Estate</td> <td>July 2020</td> <td>4, 825.50</td> </tr> <tr> <td>Aug 2020</td> <td>4, 551.10</td> </tr> <tr> <td>Sept 2020</td> <td>4, 833.60</td> </tr> <tr> <td rowspan="3">Lanadron Estate</td> <td>July 2020</td> <td>4, 840.00</td> </tr> <tr> <td>Aug 2020</td> <td>4, 654.20</td> </tr> <tr> <td>Sept 2020</td> <td>4, 677.10</td> </tr> <tr> <td rowspan="3">Pengkalan Bukit Estate</td> <td>July 2020</td> <td>7, 635.40</td> </tr> <tr> <td>Aug 2020</td> <td>7, 682.80</td> </tr> <tr> <td>Sept 2020</td> <td>7, 977.30</td> </tr> </tbody> </table>	Operating Units	Month	Amount (RM)	Pagoh Estate	July 2020	4, 825.50	Aug 2020	4, 551.10	Sept 2020	4, 833.60	Lanadron Estate	July 2020	4, 840.00	Aug 2020	4, 654.20	Sept 2020	4, 677.10	Pengkalan Bukit Estate	July 2020	7, 635.40	Aug 2020	7, 682.80	Sept 2020	7, 977.30	<p>Complied</p>
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		Pagoh POM	July 2020	3, 651.50	
			Aug 2020	3, 694.10	
			Sept 2020	3, 691.90	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Operating Unit	2019	2020	Complied
		Lanadron Estate	7 Cases (32 Days)	13 Cases (14 Days)	
		Pengkalan Bukit Estate	2 Cases (24 days)	1 Case (0 Days)	
		KKS Pagoh	2 Cases (47 Days)	1 Cases (1 Day)	
		Pagoh Estate	9 Cases (23 Days)	2 Cases (8 Days)	
Principle 7: Protect, conserve and enhance ecosystems and the environment					
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.					
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	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. Barn owls Tyto Alba has been introduced for biological control of rats. Barn owl boxes are constructed at the rate of 1 box to 10ha. Census records show that there was minimal outbreak of leaf eating pest. Although there have been minimal outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators and further reduce the outbreak. The estates have planted beneficial			Complied

		<p>plants such as <i>Cassia cobanensis</i> and <i>Turnera subulata</i> and <i>Antigonon leptopus</i>.</p> <p>Yearly specific plans were available for the year 2020 by the estate. Sighted the IPM Plan for each estate as below:</p> <p>Lanadron Estate</p> <ul style="list-style-type: none"> To increase the beneficial plant planting at 2019B (newly replanted field). Currently recorded over 1.2 dm/ha to increase up to 2dm/ha in order to enhance the biological control of insect infestation. To increase the Barn Owl box Ratio to 1:10 in 2 years' time to increase the biological control of rat infestation in the estate. <p>Pengkalan Bukit Estate</p> <ul style="list-style-type: none"> To maintain progressive planting of <i>Tunera subulate</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> at immature area. To do census on barn owl. <p>Pagoh Estate</p> <ul style="list-style-type: none"> To ensure pesticide and herbicide use its optimum level by introduction of IPM such as Beneficial Plants and Barn Owl Boxes. 	
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>Species referenced in the Global Invasive Species Database and CABI.org are not used in the estates.</p>	Complied

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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>There were no evidence of use of fire for pest control in all the estates.</p>	Complied																
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																			
7.2.1	<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.</p> <p>- 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.</p>	Complied																
7.2.2	<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.</p> <p>- 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 by the state and submitted to the Head Quarters monthly. Sampled the chemicals used for the month July, Aug & Sept 2020 as below:-</p> <table border="1" data-bbox="1137 954 1933 1193"> <thead> <tr> <th>Operating Units</th> <th>Jul 2020</th> <th>Aug 2020</th> <th>Sept 2020</th> </tr> </thead> <tbody> <tr> <td>Lanadron Estate</td> <td>0.267</td> <td>0.660</td> <td>0.883</td> </tr> <tr> <td>Pengkalan Bukit Estate</td> <td>0.587</td> <td>0.367</td> <td>1.267</td> </tr> <tr> <td>Pagoh Estate</td> <td>0.476</td> <td>0.548</td> <td>0.720</td> </tr> </tbody> </table>	Operating Units	Jul 2020	Aug 2020	Sept 2020	Lanadron Estate	0.267	0.660	0.883	Pengkalan Bukit Estate	0.587	0.367	1.267	Pagoh Estate	0.476	0.548	0.720	Complied
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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.</p> <p>- Critical (Major) compliance -</p>	<p>The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan.</p>	Complied																

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		<p>Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas.</p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was eliminated and in its place Acephate is used.</p>	
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There is no evidence of prophylactic use of pesticides in all estates visited.</p>	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:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>Sighted in the Chemical Registers dated 06.01.2020 showed that only class III & IV chemicals were used at all the estates visited. During the site visit to the chemical store it was justified that there were only class II, III and IV chemicals being used. Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead. Monocrotophos was eliminated and in its place, Acephate is used.</p>	Complied
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).</p>	<p>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and</p>	Complied

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	<p>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>understood by them. This was noted during the interview with workers in the estate and mill.</p> <p>Sampled the training conducted for pesticide handlers as below: -</p> <table border="1" data-bbox="1137 491 1928 1082"> <thead> <tr> <th>Operating Unit</th> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Lanadron Estate</td> <td>Spraying Technique and Safety Training</td> <td>05.07.2020</td> </tr> <tr> <td>Spraying Pump Technical Training by MYCROP</td> <td>26.06.2020</td> </tr> <tr> <td rowspan="4">Pengkalan Bukit Estate</td> <td>Inter Pump Training</td> <td>28.08.2020</td> </tr> <tr> <td>Spraying Techniques, Chemical handling and PPE</td> <td>13.08.2020</td> </tr> <tr> <td>P&D Spraying Training</td> <td>10.07.2020</td> </tr> <tr> <td>Spraying pump maintenance, Chemical Classification and Safety Data Sheet.</td> <td>14.02.2020</td> </tr> <tr> <td>Pagoh Estate</td> <td>Circle Spraying & Safety Training</td> <td>07.10.2020</td> </tr> </tbody> </table>	Operating Unit	Training	Date	Lanadron Estate	Spraying Technique and Safety Training	05.07.2020	Spraying Pump Technical Training by MYCROP	26.06.2020	Pengkalan Bukit Estate	Inter Pump Training	28.08.2020	Spraying Techniques, Chemical handling and PPE	13.08.2020	P&D Spraying Training	10.07.2020	Spraying pump maintenance, Chemical Classification and Safety Data Sheet.	14.02.2020	Pagoh Estate	Circle Spraying & Safety Training	07.10.2020	
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7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with</p>	Complied																				

		adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.	
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	<p>Pesticide containers were found to be recycled and used as premix containers. The access containers were all triple rinsed and punctured and stored at the designated store before they are disposed to the licensed recycle waste collector.</p> <p>Sighted the latest consignment note for disposal of triple rinsed and punctured chemical drums as below: -</p> <p>Lanadron Estate</p> <ul style="list-style-type: none"> • Latest Disposal of empty chemical drums as recycle waste disposed on 08.10.2020 to SS Setia Teknologi Enterprise. Cash Receipt No: 1736; 97 Pcs of Chemical Containers, 25 Pcs of Kenlon Containers & 25 Kgs of Ally Containers. <p>Pengkalan Bukit Estate</p> <ul style="list-style-type: none"> • Latest Disposal of empty chemical drums as recycle waste disposed on 12.10.2020 to SS Setia Teknologi Enterprise. Cash Receipt No: 1738; 68pcs of Chemical Containers. <p>Pagoh Estate</p> <ul style="list-style-type: none"> • Latest Disposal of empty chemical drums as recycle waste disposed on 12.10.2020 to SS Setia Teknologi Enterprise. Cash Receipt No: 1739; 69pcs of Chemical Containers and 150 kgs of Ally Bottles. 	Complied
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	No aerial spraying for pesticide were done in all the estates.	Complied

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<p>7.2.10</p>	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -</p>	<p>Specific Annual Medical Surveillance was conducted for all workers exposed to chemicals including sprayers, mandores,</p> <p><u>Lanadron Estate</u> A total of 6 workers identified to be exposed to chemicals and fumes were sent for medical surveillance on October 2020. The results have yet to be obtained by the operating unit.</p> <p><u>Pengkalan Bukit Estate</u> A total of 15 workers have been identified to be exposed to chemicals or fumes were sent for medical surveillance on 23rd and 24th July 2020. The medical surveillance was conducted by Klinik TTMC Ayer Keroh, Dr. Norhayati Binti Md. Amin (HQ/OHD/17/00164). Based on the test results, all workers were claimed to have no chemical toxicity in the test results. All workers were fit to work as per doctor’s recommendation.</p> <p><u>Pagoh Estate</u> Based on the revised CHRA Report, dated 04th June 2020 by Assessor Dosh Reg: HQ/15/ASS/00/63, Continue to carry out medical surveillance programme by a registered OHD due to the employees exposed or likely exposed to chemicals hazardous to health and the chemical used are concluded as having significant risk for work units: a) Premix (All Chemicals), Workshop (Manganese) – Welder. The medical surveillance programme should be conducted at intervals if not more than twelve months or at such shorter intervals as determined by the OHD. As for Pagoh Estate, it was identified that there were 3 workers (Welders & Pre-Mixer) that should be sent for medical surveillance</p>	<p>Non-compliance</p>
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		at intervals of not more than 12 months. Medical Surveillance was conducted for these workers on 8 th October 2020, 20 months after the previous medical surveillance (21 st January 2019). The results have yet to be obtained by the operating unit. Hence a major non-conformity was raised.	
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>All estates visited have prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Gender Policy and Occupational Safety and Health Policy signed by the Managing Director on January 2015.</p> <p>In addition to that, there was an internal memo at Lanadron Estate available for verification dated 3rd January 2020 by the Acting Manager stating that there shall be NO work with pesticide or any other related chemicals for confirmed pregnant and breast-feeding women.</p> <p>It was sighted during the visit to the stores there were signages stating that pregnant and breast-feeding women are not allowed to enter the chemical stores.</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>- Minor compliance -</p>	<p>Wastes management plan is developed through the environmental aspects and impacts assessment. The mitigation measures were then derived from this exercise. Generally, the scheduled wastes were disposed through licensed vendors, organic wastes were disposed through landfill. Nonetheless, the wastes management plan can be further enhanced by including the management of recyclable wastes from the household and office such as plastic bottles/containers, glass, papers and metal.</p>	OFI

<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>Generally, the workers have demonstrated good understanding in proper disposal of wastes. The visited labour quarters were observed to be in clean condition. Wastes were properly disposed as mentioned in Indicator 7.3.1.</p> <p>SW disposed through licensed contractors which were verifiable through eSwis. Examples of Consignment notes verified:</p> <p>Lanadron:</p> <p>#20200730103DYKZR – SW306-dated 30/7/2020 #20200724140LSZ8B – SW306-dated 24/7/2020 #202010121053M8SL – SW306-dated 12/10/2020 #202010126EG0NKI – SW410-dated 12/10/2020</p> <p>Pengkalan Bukit:</p> <p>#20201012178P7UDS – SW409-dated 12/10/2020 #2020101217ZM57E6 – SW410-dated 12/10/2020 #2020100517V8S72J – SW305-dated 5/10/2020 #2020100517O6IJ4Y – SW306-dated 5/10/2020 #20200924177EJB50 – SW404-dated 24/9/2020</p> <p>Pagoh POM:</p> <p>#20200807127VX1OK – SW306-dated 7/8/2020 #2020080712983ACZ – SW324-dated 7/8/2020</p>	<p>Complied</p>
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		<p>#2020080712H2E1BV – SW322-dated 7/8/2020 #20200807123O5L94 – SW409-dated 7/8/2020 #2020080712M6R2LA – SW410-dated 7/8/2020 #202003251158WXZP – SW110-dated 25/3/2020</p> <p>Pagoh Estate: #2020101217COWPYL – SW410-dated 12/10/2020 #2020090312VHA346 – SW404-dated 3/9/2020 #2020072413J0OVWS – SW305-dated 25/6/2020 #2020010409YCTOAF – SW305-dated 3/1/2020 #2020010409AI5P4Q – SW410-dated 4/1/2020 #2020010409L3K2N1 – SW404-dated 4/1/2020</p> <p>Landfill is also used for disposal of wastes guided under Operational Control Procedure, Landfill Management in Estate [doc. No.: SD/SDP/PSQM(ESH)/203-EN7, rev. 0, dated 13/3/2017].</p>	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	There was no wastes disposal by using open fire observed during the site visits.	Complied
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 -	ARM Section 8 covers the procedure for fertiliser application for both immature and mature. The procedure gives the guideline type of fertilisers to be used, timing to apply, dosage and placement.	Complied

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7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Periodic foliar sampling analysis was last conducted in February 2020 and soil sampling analysis in 2018 to monitor the changes in nutrient status was available. The results of the analysis were used by the agronomist for their recommendation for fertilisers application programmes. Soil analysis was done once in 5 years in accordance to procedure. E.g. latest Soil Analysis Test at Lanadron Estate was conducted in 2018 [ref.: Report #S22/2018 by Chief Chemist II dated 9/4/2018.</p>	Complied
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.</p> <p>- Minor compliance -</p>	<p>EFB application is done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from Pagoh POM. Currently only Pagoh Estate and Pengkalan Bukit Estate are applying the EFB mulching due to distance from the mill. The best practice of EFB application is described in the ARM. Records were available for verification. Based on the records, it was noted that the EFB application rate per hectare was around 40 mt/Ha.</p>	Complied
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilisers input is recorded in store issue notes and manuring record book, which have the information about type of fertiliser, quantity (bags and kg), dates of application and field number. Verification of records confirmed that the applied fertilisers were tally with the agronomist recommendation.</p>	Complied
Criterion 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Maps of any soil categories available at all visited operating units. Soil map prepared by R&D-RSGA Precision Agriculture Unit (SHMNA).</p> <p>Lanadron Estate The soil map prepared by R&D-RSGA Precision Agriculture Unit (SHMNA) dated 15 June 2015. Majority soil series identified in the estate were Briaah 36.1%, Acid Sulphate 20.48% and Sogomana 12.82%. No fragile soils identified estate.</p>	Complied

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		<p>Welch Estate The soil map prepared by R&D-RSGA Precision Agriculture Unit (SHMNA) in January 2012. Majority soil series identified in the estate were Serdang/Bungor 24.4%, Munchong 36.9%, and Alluvium 21.2%. No fragile soils identified estate.</p> <p>Pengkalan Bukit Estate The soil map prepared by R&D-RSGA Precision Agriculture Unit (SHMNA) on 11/11/2015 for Main, Pagoh and Paya Redan Division. Main soil series identified in the estate were Rengam 21.88%, Prang, 12.85%, Munchong 30.29% and Alluvium 11.22%.</p> <p>Pagoh Estate The soil map prepared by R&D-RSGA Precision Agriculture Unit (SHMNA) in 1/11/ 2012. Majority soil series identified in the estate are Lanchang 35.91%, Alluvium 13.24% and Rengam 34.41%.</p>	
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.</p> <p>- Minor compliance -</p>	<p>There was no observation of replanting on steep slopes at the sampled estates. Generally, the areas with slopes above 25 degrees were left unplanted and regeneration of plants growth was observed.</p>	Complied
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>No new planting at all the sampled estates.</p>	Complied
<p>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.</p>			
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>Not Applicable as there is no new planting in the certification unit.</p>	Not Applicable

	- Critical (Major) compliance -		
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Not Applicable as there is no new planting in the certification unit.	Not Applicable
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Not Applicable as there is no new planting in the certification unit.	Not Applicable
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	Not applicable as no peat soil in this certification unit.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. 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). - Minor compliance -	Not applicable as no peat soil in this certification unit.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Not applicable as no peat soil in this certification unit.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	Not applicable as no peat soil in this certification unit.	Not Applicable
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or	Not applicable as no peat soil in this certification unit.	Not Applicable

	<p>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>		
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>	Not applicable as no peat soil in this certification unit.	Not Applicable
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>	Not applicable as no peat soil in this certification unit.	Not Applicable
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
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</p>	<p>Water management plan at all the sampled estates were in place and implemented as verified through records of Water Management Action Plan West Estate FY 2020:</p>	Complied

	<p>negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<ul style="list-style-type: none"> - Line site water usage - Water leakage - Workshop – rain water harvesting <p>Identification and management of wastewaters:</p> <ul style="list-style-type: none"> - Chemical mixing area - Sprayer PPE washing area - Workshop - Line site & office - Washrooms <p>Workers have adequate access to clean water which were supplied through their own water treatment plant and public domain (Syarikat Air Johor). The potable water supplied to the workers through water treatment plants was tested for NSDWQ compliance on monthly basis. Among the parameters tested were pH, TDS, Turbidity, Chloride, Al, E. Coli and Total Coliform. Based on the test report by an accredited lab (SAMM No. 030), generally the certification unit complied to the regulated limit.</p>							
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>Water courses and wetlands are protected as per documented Guidelines on River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). The widths of the buffer zones are guided by the following measurements:</p> <table border="1" data-bbox="1220 1220 1825 1366"> <thead> <tr> <th>River width (m)</th> <th>Buffer zone width</th> </tr> </thead> <tbody> <tr> <td>> 40</td> <td>50</td> </tr> <tr> <td>20 to 40</td> <td>40</td> </tr> </tbody> </table>	River width (m)	Buffer zone width	> 40	50	20 to 40	40	Complied
River width (m)	Buffer zone width								
> 40	50								
20 to 40	40								

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		<table border="1"> <tr> <td>10 to 20</td> <td>20</td> </tr> <tr> <td>5 to 10</td> <td>10</td> </tr> <tr> <td>< 5</td> <td>5</td> </tr> </table> <p>Monitoring based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/rivers, version 1, year 2008, issue no. 1, dated 1/11/2008.</p> <p>Based on verification at all the sampled estates, the riparian zones were satisfactorily maintained, and no evidence of agrochemicals application seen.</p>	10 to 20	20	5 to 10	10	< 5	5	
10 to 20	20								
5 to 10	10								
< 5	5								
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>The mill applies the biological system with 14 ponds in series for its treatment of effluent. The mill is disposing its effluent to the water ways. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Last 12 months results were verified where highest BOD was 20 ppm while lowest was 5 ppm.</p> <p>Competent Person as required by legal was also verified. Currently, the responsibility is held by the mill manager, Certificate No. CePPOME/201164, valid until 16/3/2021.</p>	Complied						
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill continues to monitor its water use per tonne FFB processed which data obtained from a flowmeter. Based on the records, the mill has been using less than 1.3 m³/mt FFB per month since the last assessment.</p>	Complied						
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>At the estates, the plan to optimise the usage of diesel is by regular maintenance of diesel-powered machinery and educational</p>	Complied						

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	- Minor compliance -	programme for the operators on fuel saving. At the mill, the utilisation of fibre and shell as biofuel for boiler operation is consistently implemented to generate electricity through turbines. This helps to reduce the dependency to fossil fuel.	
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.			
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>Main sources of GHG emission identified were methane (CH) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>The emission value is recorded and calculated through the utilisation of RSPO's Palm GHG Calculator ver. 4.</p>	Complied
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>	Not applicable since no new development by the certification unit.	Not Applicable
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>	<p>Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment, among the identified sources of gaseous emissions were boiler chimney, diesel engines and POME to name a few. Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring for dust particulate.</p> <p>SOU 19 has its monitoring system to report its significant pollutants and emissions from the operating units' activities for example monitoring stack emission from mill's boiler operation by competent consultant. The mill has conducted its stack sampling at regulated</p>	Complied

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		frequency (twice a year) without fail. Based on the stack sampling reports [PAC-AE-191025, dated 30/10/2019 and PR20-ISS-0028, dated 18/6/2020], the emission from the chimney were reported to be below the regulated limit i.e. 150 mg/m ³ which is 62 mg/m ³ and 12.66 mg/m ³ respectively. Apart from that, ambient air monitoring has also been conducted on quarterly basis. Verified reports dated 10/9/2020 and 14/5/2020 by a consultant (SAMM No. 516).	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Guided by SDPB ARM, preparation of replanting using fire is not allowed. Based on site visit at replanting field no. 2019B (Lanadron), 2020B & 2020C (Pengkalan Bukit), there was no trace of burning observed. Palm trunks were chipped and windrowed.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Hotspot monitoring managed by HQ (Fire Hotspot Monitoring Team) – if any fire detected, inform estate. Sime Darby Daily Hotspot Monitoring system has been in place since November 2013 using NASA satellite data. The system monitors any possible occurrence of fire within or nearby the concession areas throughout Sime Darby Plantation Upstream operation globally. At the estates level, there are fire prevention team established. Among the mechanisms to prevent fire are training on fire-fighting for the ERT, preparing the fire-fighting facilities such as tractor mounted with water bowser and submersible water pump.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	The above-mentioned fire prevention and control measures were communicated to the stakeholders through a meeting conducted on 16 July 2020 at Ladang Pengkalan Bukit covering all the operating units of SOU 19. Among the adjacent stakeholders attended the meeting were: Lanadron:	Non-compliance

		<p>Kg Hujung Tambak SRK Kota Raja Panchor</p> <p>Pengkalan Bukit: Ketua Kampung Sri Makmor Ketua Kampung Panjang Sari Kampung Sari Baharu Pagoh Muar Klinik Kesihatan Pagoh</p> <p>However, based on samples, the following adjacent stakeholders have yet to be engaged.</p> <p>Lanadron Estate:</p> <ul style="list-style-type: none"> • Tn. Khairunnasir Bin Md Zim, Pej. Penghulu Mukim. Jorak/Panchor • Tn. Lukman Bin Haji Hassan, Kg.Brohol • En. Mohd Khalid Bin Mohammad, Kg.Seri Tanjung,Panchor <p>Pengkalan Bukit:</p> <ul style="list-style-type: none"> • Hor Lee Estate <p>Pagoh Estate:</p> <ul style="list-style-type: none"> • Koo Seng Hiap • Lim Peng Guat @ Lim Peng Joo • Othman Bin Lembek • Toh Ah Chai @ Tuh Ah Moy • Koh Kong Hoe 	
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		<ul style="list-style-type: none"> • How Bon Chon <p>Nonetheless, the list is not exhaustive. Thus a non-conformity report was assigned due to this lapse.</p>	
<p>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.</p>			
7.12.1	<p>(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.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, this indicator is not applicable during this assessment. The immature areas are of replanted area.</p>	Complied
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>c) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>d) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>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>SOU 19 has conducted HCV re-assessment and documented in HCV Re- Assessment for Strategic Operating Unit (SOU) 19 Pagoh on 24 - 27 November 2015 by Plantation Sustainability Quality Management (PSQM) Department, Sime Darby Plantation Sdn. Bhd. Final Report (Version 2.0) dated August 2016. HCV area identified for SOU 19 Pagoh as follows:</p> <p>i) Water Catchment area – category HCV 4 (Welch Estate, Pagoh Estate, Pengkalan Bukit Estate)</p> <p>ii) River Reserve (Muar River)– category HCV 4 (Lanadron Estate)</p> <p>Nonetheless, the awareness on HCV of Pagoh Estate management can be further improved in order to have clearer information in classifying the HCV area. For example, Pagoh Estate has classified the 16.52 Ha of "forest area" (occupied with rubber trees and rattan</p>	OFI

		before) as HCV but classified otherwise in the HCV Re-assessment Report, August 2016 (OFI).	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not Applicable	Not Applicable
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 RTE identified as per in HCV Re-Assessment for Strategic Operating Unit (SOU) 19 Pagoh on 24 -27 November 2015 by Plantation Sustainability Quality Management (PSQM) Department, Sime Darby Plantation Sdn. Bhd. Final Report (Version 2.0) dated August 2016.</p> <p>The sampled estates have established and documented HCV area/Biodiversity management Plan. Generally among the plans established were:</p> <ul style="list-style-type: none"> - maintaining signages - continue to record HCV monitoring such as wildlife sighting, encroachment and illegal hunting - enhancing HCV awareness among employees. <p>The estates continue to train the workers on HCV and RTE Species. Signage on prohibition of illegal hunting or fishing, no swimming and chemical application at buffer zone area were erected at the HCV area. Noted during site visit, all the signage was well maintained.</p>	Complied
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	Not applicable since there is no land clearing after November 2005.	Not Applicable

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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>The estates continue to train the workers on HCV and RTE Species. Signage on prohibition of illegal hunting or fishing, no swimming and chemical application at buffer zone area were erected at the HCV area, housing area and notice board to educate the workers. Last trainings to workers on HCV were conducted on 02.09.2020 at the muster ground and 07.07.2020 at the community hall.</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>Not applicable since there is no land clearing after November 2005. Nonetheless, educational activities on RTE species were done through a few means such as briefings/training and no hunting signage. Interview with workers showed that they have a good understanding in the restriction of capturing the RTE species.</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>Not applicable since there is no land clearing after November 2005.</p>	Not Applicable

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 Berhad 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 Berhad 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>For details please refer to Attachments: i) Sime Darby Plantation Berhad - RSPO Certification Status for Malaysia Operations ii) Sime Darby Plantation Berhad- RSPO Certification Status for Indonesia Operations iia) Updates on PT MAS iii) RSPO SCCS status for Sime Darby Plantation Berhad (Downstream Operations)</p>
2008/2009	20 SOUs (from Malaysia and Indonesia)	<p>Note: Time-bound plan to achieve 100% RSPO certification has shifted to 2015.</p>	
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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1. SDP - RSPO Certification for Time Bound Plan - Malaysia Operations

As at end Apr 2020

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
1	Sg. Dingin	Sungai Dingin Oil Mill	-	Karangan, Kedah	Certified	12/8/2011	
		Anak Kulim Estate	-		Certified		
		Sungai Dingin Estate	-		Certified		
		Somme Estate	-		Certified		
		Bukit Selarong Estate	-		Certified		
		Padang Buluh Estate	-		Certified		
		Bukit Hijau Estate	-		Certified		
		Jentayu Estate	-		Certified		
2	Chersonese	Chersonese Oil Mill	-	Kuala Kurau, Perak	Certified	5/10/2011	
		Chersonese Estate	-		Certified		
		Kalumpong Estate	-		Certified		
		Tali Ayer Estate	-		Certified		
		Holyrood Estate	-		Certified		
3	Elphil	Elphil Oil Mill	-	Sg Siput, Perak	Certified	18/6/2011	
		Kamuning Estate	-		Certified		
		Elphil Estate	-		Certified		

		Kinta Kellas Estate	-		Certified		
4	Flemington	Flemington Oil Mill	-	Teluk Intan, Perak	Certified	5/10/2011	
		Flemington Estate	-		Certified		
		Bagan Datoh Estate	-		Certified		
		Sabak Bernam Estate	-		Certified		
		Sg. Samak Estate	-		Certified		
5	Seri Intan/Selaba	Seri Intan Oil Mill	-	Teluk Intan, Perak	Certified	3/3/2011	
		Selaba Oil Mill	-		Certified		
		Seri Intan (+ Selaba) Estate	-		Certified		
		Sabrang Estate	-		Certified		
		Sogomana Estate	-		Certified		
		Sg. Wangi Estate	-		Certified		
		Bikam Estate	-		Certified		
		Cluny (+ Bedford) Estate	-		Certified		
6	Tennamaram	Tennamaram Oil Mill	-	Bestari Jaya, Selangor	Certified	3/3/2011	
		Tennamaram Estate	-		Certified		
		Sungai Buluh Estate	-		Certified		
		Bukit Talang Estate	-		Certified		
7	Bkt Kerayong	Bukit Kerayong Oil Mill	-	Kapar, Selangor	Certified	15/4/2011	
		Bukit Kerayong Estate	-		Certified		

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		Bukit Cheraka Estate	-		Certified		
		Elmina Estate	-		Certified		
8	East	East Oil Mill	-	Carey Island, Selangor	Certified	19/5/2011	
		East Estate	-		Certified		
		Sepang Estate	-		Certified		
		Dusun Durian Estate	-		Certified		
9	West	West Oil Mill	-	Carey Island, Selangor	Certified	19/5/2011	
		West Estate	-		Certified		
10	Bukit Puteri	Bukit Puteri Oil Mill	-	Raub, Pahang	Certified	7/7/2011	
		Bukit Puteri Estate	-		Certified		
11	Kerdau	Kerdau Oil Mill	-	Temerloh, Pahang	Certified	7/7/2011	
		Kerdau Estate	-		Certified		
		Jentar Estate	-		Certified		
		Mentakab Estate	-		Certified		
		Chenor Estate	-		Certified		
		Sg Mai Estate	-		Certified		
12	Jabor	Jabor Oil Mill	-	Kuantan, Pahang	Certified	7/7/2011	
		Jabor Estate	-		Certified		
13	Labu	Labu Oil Mill	-		Certified	30/12/2011	

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		Labu Estate	-	Nilai, Negeri Sembilan	Certified		New Labu Estate has become a division of Labu Estate.
14	Tanah Merah	Tanah Merah Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	19/5/2010	
		Tanah Merah Estate	-		Certified		
		Bukit Pelandok Estate	-		Certified		
15	Sua Betong	Sua Betong Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	18/2/2014	Siliao Estate has now been merged into Salak Estate and Bradwall Estate.
		Sua Betong Estate	-		Certified		
		Sengkang Estate	-		Certified		
		Bradwall Estate	-		Certified		
		PD Lukut Estate	-		Certified		
		Tampin Linggi Estate	-		Certified		
		Sg. Bahru Estate	-		Certified		
		Salak Estate	-		Certified		
16	Kok Foh	Kok Foh Oil Mill	-	Bahau, Negeri Sembilan	Certified	7/7/2011	
		Muar River Estate	-		Certified		
		Sg. Senarut Estate	-		Certified		
		Sg. Gemas Estate	-		Certified		
		Kok Foh Estate	-		Certified		
		Bukit Pilah Estate	-		Certified		
		St. Helier Estate	-		Certified		

		Sungai Sabaling Estate	-		Certified		
		Pertang Estate	-		Certified		
17	Kempas	Kempas Oil Mill	-	Jasin, Melaka	Certified	19/5/2010	
		Kempas Estate	-		Certified		
		Tangkah Estate	-		Certified		
		Kemuning Estate	-		Certified		
18	Diamond Jubilee	Diamond Jubilee Palm Oil Mill	-	Jasin, Melaka	Certified	5/10/2011	
		Serkam Estate	-		Certified		
		Diamond Jubilee Estate	-		Certified		
		Bukit Asahan Estate	-		Certified		
19	Pagoh	Pagoh Oil Mill	-	Muar, Johor	Certified	28/1/2014	
		Pagoh Estate	-		Certified		
		Welch Estate	-		Certified		
		Lanadron Estate	-		Certified		
		Pengkalan Bukit Estate	-		Certified		
20	Chaah	Chaah Oil Mill	-		Certified	18/11/2010	
		Chaah Estate	-		Certified		
		Sg. Simpang Kiri Estate	-		Certified		
		North Labis Estate	-		Certified		
		Gunung Mas Oil Mill	-		Certified		

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21	Gunung Mas	Gunung Mas Estate	-	Kluang, Johor	Certified	19/5/2010	* SDP acquired Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bkt Paloh Estate of SOU 21 Gunung Mas, Lian Seng has been incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018.
		Kempas Klebang Estate	-		Certified		
		Bukit Paloh Estate	-		Certified		
		Yong Peng Estate	-		Certified		
22	Bukit Benut	Bukit Benut Oil Mill	-	Kluang, Johor	Certified	5/10/2011	* SDP acquired Talisman Estate in Johor in April 2017. Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut and has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2018.
		Bukit Benut Estate	-		Certified		
		Lambak Elaeis Estate	-		Certified		
		CEP Nyior Estate	-		Certified		
23	Ulu Remis	Ulu Remis Oil Mill	-	Layang-layang, Johor	Certified	11/4/2011	
		Ulu Remis Estate	-		Certified		
		Cenas Estate	-		Certified		
		Bukit Badak Estate	-		Certified		
		Tun Dr. Ismail Estate	-		Certified		
		Pekan Estate	-		Certified		
		Sembrong Estate	-		Certified		
24	Hadapan	Hadapan Oil Mill	-	Layang-layang, Johor	Certified	29/3/2011	
		Sri Pulai Estate	-		Certified		
		Kulai Estate	-		Certified		

		Layang Estate	-		Certified		
		CEP Renggam Estate	-		Certified		
26	Sandakan Bay	Sandakan Bay	-	Sandakan, Sabah	Certified	1/10/2008	
		Tun Tan Siew Sin	-		Certified		
		Tunku Estate	-		Certified		
		Tigowis Estate	-		Certified		
		Sentosa Estate	-		Certified		
		Segaliud Estate	-		Certified		
27	Melalap	Melalap Oil Mill	-	Tenom, Sabah	Certified	21/1/2011	
		Melalap Estate	-		Certified		
		Sapong Estate	-		Certified		
28	Binuang	Binuang Oil Mill	-	Kunak, Sabah	Certified	16/1/2009	
		Binuang Estate	-		Certified		
		Sungang Estate	-		Certified		
		Tingkayu Estate	-		Certified		
		Jeleta Bumi Estate	-		Certified		
29	Giram	Giram Oil Mill	-	Kunak Sabah	Certified	16/1/2009	
		Giram Estate	-		Certified		
		Mostyn Estate	-		Certified		

30	Merotai	Merotai Oil Mill	-	Tawau, Sabah	Certified	16/1/2009	
		Merotai Estate	-		Certified		
		Imam Estate	-		Certified		
		Tiger Estate	-		Certified		
		Table Estate	-		Certified		
31	Lavang	Lavang Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	
		Lavang Estate	-		Certified		
		Rasan Estate	-		Certified		
		Belian Estate	-		Certified		
		Kelida Estate	-		Certified		
		Lavang (Special) Estate	-		Certified		
		Pekaka Estate	-		Certified		
		Ruai Estate	-		Certified		
		Dulang Estate	-		Certified		
		Charquest Estate	-		Certified		
		Paroh Estate	-		Certified		
32	Rajawali	Rajawali Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	
		Rajawali Estate	-		Certified		
		Samudera Estate	-		Certified		

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		Semarak Estate	-		Certified		
		Bayu Estate	-		Certified		
33	Derawan	Derawan Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	
		Derawan Estate	-		Certified		
		Sahua Estate	-		Certified		
		Takau Estate	-		Certified		
		Damai Estate	-		Certified		
34	Pekaka	Pekaka Mill	-	Bintulu, Sarawak	Withdrawn	NA	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.
35	Bintang	Bintang Oil Mill	-	Johor	NA	NA	* 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 1st Oct 2018, the mill has completed the selling off transaction.

2. SDP - RSPO Certification for Time Bound Plan - Indonesia Operations

As at end Apr 2020

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No	Management Unit	Mill and Supply Base	Time Bound Plan	Latest Internal / External	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name			Audit Date				
1	PT Lahan Tani Sakti	Alur Dumai Mill	-		Rokan Hilir District – Riau	Certified	16/1/2012	
		Alur Dumai Estate	-			Certified		
2	PT Sajang Heulang	Mustika Mill	-		Tanah Bumbu District – South Kalimantan	Certified	3/7/2013	
		Mustika Estate	-			Certified		
		KKPA-2 PT.SHE Estate	-			Certified		
		KKPA-3 PT.SHE Estate	-			Certified		
		KKPA-5 PT.SHE Estate	-			Certified		
3	PT Ladangrumpun Suburabadi	Angsana Mill	-		Tanah Bumbu District – South Kalimantan	Certified	6/7/2011	PT LSI Plasma has been audited by the Certification Body in 2017. The identified legal issue on HGU is being address.
		Angsana Estate	-			Certified		
		Pantai Bonati Estate	-			Certified		
		Gunung Sari Estate	-			Certified		
		Subur Abadi Plasma 1 Estate	2020	Jul-19		Stage Two		
		KKPA-1 PT.SHE Estate	-			Certified		
		KKPA-4 PT.SHE Estate	-			Certified		
4	PT Langgeng Muaramakmur	Bebunga Mill	-			Certified		
		Bebunga Estate	-			Certified		

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		Sungai Cengal Estate	-		Kotabaru District – South Kalimantan	Certified	16/3/2012	Previously KKPA Sg. Cengal. Sime Darby Plantation does not have management control over the plasma scheme.
		Bakau Estate	-			Certified		
		KKPA LMR	2020			-		
5	PT Kridatama Lancar	Sukamandang Mill	-		Seruyan and East–Kotawaringin District Central Kalimantan	Certified	5/7/2011	
		Sukamandang Estate	-			Certified		
		Sapiri Estate	-			Certified		
		Barasdanum Estate	-			Certified		
		Kuala Kuayan Estate	-			Certified		
6	PT Bahari Gembira Ria	Ladang Panjang Mill	-			Certified	9/7/2012	Only Division 3 (1200ha) was certified . Division 1 & 2 with 1792 Ha received HGU recently. The unit is getting ready for certification. Plan for certification in 2020.Total Ladang Panjang Estate is 2992 ha. Sime Darby Plantation does not have management control over the plasma scheme. 1 out of 6 Koperasi Unit Desa (KUD) has been RSPO Certified. And all KUD is planned to undergo RSPO Certification by 2020 as reported in the timebound plan. Socialisation with the entire KUD is currently ongoing. Land Use Change Analysis has been completed for Plasma BGR.
		Ladang Panjang Estate	-			Certified		

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		Plasma BGR Estate	2020	Nov-19	Muaro Jambi District - Jambi			
7	PT Tunggal Mitra Plantations	Manggala Mill	-		Rokan Hilir District – Riau	Certified	25/11/2010	
		Manggala 1 Estate	-			Certified		
		Manggala 2 Estate	-			Certified		
		Manggala 3 Estate	-			Certified		
8	PT Paripurna Swakarsa	Pondok Labu Mill	-		Kotabaru District – South Kalimantan	Certified	16/3/2012	
		Pondok Labu Estate	-			Certified		
		Binturung Estate	-			Certified		
		Rampa Estate	-			Certified		
		Sesulung Estate	-			Certified		
9	PT Bersama Sejahtera Sakti	Gunung Aru Mill	-		Kotabaru District – South Kalimantan	Certified	5/7/2011	
		Gunung Aru Estate	-			Certified		
		Gunung Kemas Estate	-			Certified		
		Laut Timur Estate	-			Certified		
		Pantai Timur Estate	-			Certified		
		KKPA MBP	2020	Dec-19		-		
10	PT Guthrie Pecconina	Rantau Panjang Mill	-		Musi Banyuasin District –	Certified	16/3/2012	
		Rantau Panjang Estate	-			Certified		

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		Bumi Ayu Estate	-		South Sumatera	Certified		Remarks: Land legalisation process for 4152.70 ha is still in process.
		Karang Ringin Estate	-			Certified		
		Napal Estate	-			Certified		
		Mangun Jaya Estate	-			Certified		
		Sungai Jernih Estate and GPI KKPA Estate	2020	Oct-19		-		
11	PT Laguna Mandiri	Rantau Mill	-		Kotabaru District – South Kalimantan	Certified	30/12/2011	
		Rantau Estate	-			Certified		
		Matalok Estate	-			Certified		
		Betung Mill	-			Certified	1/4/2014	
		Betung Estate	-			Certified		
		Sekayu Estate	-			Certified		
12	PT Indotruba Tengah	Sekunyir Mill	-		Seruyan and West Kotawaringin District – Central Kalimantan	Certified	23/11/2010	
		Sekunyir	-			Certified		
		Seruyan Estate	-			Certified		
13	PT Swadaya Andika	Selabak Mill	-		Kotabaru District – South Kalimantan	Certified	16/3/2012	Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification.
		Selabak Estate	-			Certified		
		Randi Estate	-			Certified		
		Sangkoh Estate	-			Certified		
		Lanting Estate				Certified		

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14	PT Bina Sains Cemerlang	Sungai Pinang Mill	-		Musi Rawas District – South Sumatera	Certified	11/9/2012	Remarks: Land legalisation process for 308.35 ha is still in process.
		Sungai Pinang Estate	-			Certified		
		Bukit Pinang Estate	-			Certified		
15	PT Teguh Sempurna	Pematang Mill	-		Seruyan and East Kotawaringin District – Central Kalimantan	Certified	5/7/2011	
		Pematang Estate	-			Certified		
		Kawan Batu Estate	-			Certified		
		Hatan Tiring Estate	-			Certified		
		Batang Garing Estate	-			Certified		
16	PT Bhumireksa Nusa Sejati	Teluk Bakau Mill	-		Indra Giri Hilir District – Riau	Certified	11/10/2011	
		Teluk Bakau Estate	-			Certified		
		Nusa Lestari Estate	-			Certified		
		Nusa Perkasa Estate	-			Certified	1/4/2014	
		Mandah Mill	-			Certified		
		Mandah Estate	-			Certified		
		Rotan Semelur Estate	-			Certified		
17	PT Aneka Intipersada	Teluk Siak Mill	-		Pekanbaru, Siak District – Riau	Certified	11/10/2011	
		Teluk Siak Estate	-			Certified		
		Pinang Sebatang Estate	-			Certified		
		Aneka Persada Estate	-			Certified		
18	PT Tamaco Graha Krida	Ungkaya Mill	-		Morowali District –	Certified	10/7/2012	
		Ungkaya Estate	-			Certified		

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		Plasma TGK Estate	-	Mar-20	Sulawesi Tengah	-		Perijinan' process is ongoing
19	PT SIME Indo Agro	Bukit Ajong Mill	-		Sanggau District –West Kalimantan	Certified	18/10/2010	Land legalisation process for East Est for 5815.64 ha is still in process.
		West Estate	-			Certified		
		East Estate	-			Certified		
		East* Estate /Sei Mawang Estate	2020	Jul-19		-		Land legalisation for Sei Mawang is still in process
		East Plasma Estate	-			Certified	18/7/2016	
		West Plasma Estate	-			Certified		
20	PT Padang Palma Permai / PT Perkasa Subur Sakti	Blang Simpo Mill	-		Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam	Certified	3/5/2013	
		Tamiang (PT PPP) Estate	-			Certified		
		Batang Ara (PT PSK) Estate	-			Certified		
		Blang Simpo-01 Estate	-			Certified		
		Blang Simpo-02 Estate	-			Certified		
21	PT Sandika Natapalma	Lembiru Mill	-		Ketapang District – West Kalimantan	Certified	3/7/2014	PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill i.e. Lembiru Mill.
		Lembiru Estate	-			Certified		
		Awatan Estate	-			Certified		
		Karya Palma Estate	2020	Jul-19		-	Perijinan' process is ongoing	
		KKPA SNP Estate	2020	Jul-19		-	Perijinan' process is ongoing	

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22	PT Budidaya Agro Lestari	Pelanjau (PT BAL) Estate	-		Ketapang District – West Kalimantan	Certified	3/7/2019	Perijinan informasi lahan is obtained in 2015 while the other 'perijinan' is still in processing HGU obtained as per May 2018
		Sungai Putih (PT BAL) Estate	2020	May-19		-		
		Beturus (PT BAL) Estate	2020	May-19		-		
		KKPA BAL Estate	2020	May-19		-		
23	PT Mitral Austral Sejahtera	MAS Mill	NA	NA	Sanggau District – West Kalimantan	NA	NA	The properties was sold and currently SDP have no control in the management. Please find latest information on 'Updates on PT MAS' worksheet and updates to RSPO Secretariat.
		MAS 1 Estate	NA	NA		NA		
		MAS 2 Estate	NA	NA		NA		
		MAS 4 Estate	NA	NA		NA		
		Plasma MAS Estate	NA	NA		NA		

3. SDP - RSPO Certification for Time Bound Plan - NBPOL Operations

As at end Apr 2020

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	NA	Guadalcanal Province, Solomon Islands	Certified	18/3/2011	
		Tetere Estate					
		Ngalimbiu Estate					
		Mbalisuna Estate					
		Smallholders – West Zone (83)					
		Smallholders – Central Zone (53)					
		Smallholders – MBA East Zone (59)					
Smallholders – MBE East Zone (37)							
2	Milne Bay Estates (MBE)	Hagita Oil Mill	NA	Milne Bay Province, Papua New Guinea	Certified	15/2/2018	
		Giligili Estate					
		Hagita Estate					
		Waigani Estate					
		Sagarai Estate					

		Padipadi Estate					
		Mariawatte Estate					
		Smallholders - East Gurney Estate (264)					
		Smallholders - West Gurney Estate (229)					
		Smallholders - East Sagarai Estate (157)					
		Smallholders - West Sagarai Estate (221)					
3	Poliamba (POL)	Poliamba Oil Mill	NA	New Ireland Province, Papua New Guinea	Certified	19/3/2012	
		Kara Estate					
		Nalik Estate					
		West Coast Estate					
		Noatsi Estate					
		Madak Estate					
		Smallholders -North Division (615)					
		Smallholders- South Division (868)					
		Smallholders -West Division (309)					

4	Ramu Agricultural Industries Ltd (RAIL)	Gusap Mill	NA	Morobe Province, Papua New Guinea	Certified	5/8/2010	
		Gusap East (Gusap) Estate					
		Gusap West (Paddox) Estate					
		Surinam Estate					
		Dumpu Estate					
		Ngaru Estate					
		J Estate (Jephcott) Estate					
		Smallholders - Madang VOPs (71)					
		Smallholders - Morobe VOPs (253)					
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	NA	Oro Bay Province, Papua New Guinea	Certified	1/2/2013	
		Mamba Oil Mill					
		Embi Estate					
		Ambogo Estate					
		Sangara Estate					
		Sumbiripa Estate					
		Mamba Estate					

		Sambogo Estate					
		Scheme Smallholder Sorovi Division(2019)					
		Scheme Smallholder Saiho Division(842)					
		Scheme Smallholder Aeka Division (911)					
		Scheme Smallholder Igora Division (1367)					
		Scheme Smallholder Ilimo Division (671)					
6	West New Britain (WNB)	Mosa Oil Mill	NA	Kimbe, West New Britain, Papua New Guinea	certified Certified	10/9/2008	
		Kumbango Oil Mill					
		Kapiura Mill					
		Numundo Mill					
		Waraston Mill					
		Bebere Estate					
		Kumbango Estate					
		Togulo Estate					
		Dami Estate					
		Waisisi Estate					

		Kautu Estate				
		Karausu Estate				
		Moroa Estate				
		Bilomi Estate				
		Loata Estate				
		Haella Estate				
		Garu Estate				
		Daliavu Estate				
		Sapuri Estate				
		Malilimi Estate				
		Rigula Estate				
		Nomundo Estate				
		Navarai / Karato ME /KDC EU Estate				
		Volupai / Lotomgam / Natupi / Goruru Estate				
		Lolokoru Estate				
		Ove Estate				
		Tamare Estate				
		Smallholders LSS Mosa (1822)				

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		Smallholders VOP East (1817)					
		Smallholders VOP Central (1964)					
		Smallholders VOP West (1279)					
		Smallholders LSS Kapiura (551)					
		Smallholders VOP Kapiura (850)					
		Smallholders Kaulong/Akami/Pushiki /Repamira/Sakapei (20)					
		Erap Mill	Sep-20				
7	Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd	Munum Estate	Sep-20	Markham Farms	Certified	27/3/2020	There is total area for NPP: 710.30 ha which is currently excluded from the certification scope until the NPP is approved.
		Maralumi Estate					
		Erap Estate					

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4. SDP - RSPO Certification for Time Bound Plan - Liberia Operations
 As at end Jan 2020

No	Management Unit	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name					
1	Sime Darby Plantation(Liberia) Grand Cape Mount	Not Applicable – Property disposed	Grand Cape Mount County	Not yet Certified	NA	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

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2019 for Pagoh POM and supply base was calculated using the PalmGHG Calculator version 4. 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 **Pagoh POM** and supply base are as following:

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

Extraction	%
OER	20.65
KER	5.2

Production	t/yr
FFB Process	175,081.20
CPO Produced	36,159.52
PKO Produced	9,099.98

Land Use	Ha
OP Planted Area	13,635.06
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	13,635.06

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	75047.01	0.60	2272.89	0.47	0	0	77319.90	0
CO ₂ Emission from fertilizer	7075.85	0.06	258.71	0.05	0	0	7334.55	0
NO ₂ Emission	0		0	0	0	0	0	0
Fuel Consumption	4140.59	0.03	142.23	0.03	0	0	4282.83	0
Peat Oxidation	518.00	0	13.79	0	0	0	531.79	0
Sink								
Crop Sequestration	-71134.61	-0.57	-2154.40	-0.44	0	0	-73289.01	0
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	15646.83	0.13	533.23	0.11	5073.45	0	21253.51	0

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	34318.88	0.20
Fuel Consumption	60.17	0
Grid Electricity Utilization	773.41	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	35152.46	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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	Oct 2019	9621.46	7901.73	17,523.19
2	Nov 2019	7562.67	6334.15	13,896.82
3	Dec 2019	6576.4	4394.80	10,971.20
4	Jan 2020	5529.96	4048.77	9,578.73
5	Feb 2020	9220.01	4661.81	13,881.82
6	Mar 2020	9518.7	2677.92	12,196.62
7	Apr 2020	11703.39	2425.83	14,129.22
8	May 2020	10269.23	1465.50	11,734.73
9	Jun 2020	9493.01	1302.311	10,795.32
10	Jul 2020	12898.76	2423.36	15,322.12
11	Aug 2020	11654.96	1972.09	13,627.05
12	Sep 2020	12061.2	1953.60	14,014.80
TOTAL		116109.75	41561.87	157671.62

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Oct 2019	1930.22	510.34
2	Nov 2019	1622.85	404.79
3	Dec 2019	1298.75	289.65
4	Jan 2020	1096.79	278.57
5	Feb 2020	1785.57	493.32
6	Mar 2020	1926.84	340.85
7	Apr 2020	2310.3	586.87
8	May 2020	2027.52	449.3
9	Jun 2020	1903.8	498.11
10	Jul 2020	2552.94	738.76
11	Aug 2020	2378.61	678.97
12	Sep 2020	2485.87	662.48
TOTAL		23,320.04	5,932.02

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C. Records of Certified CPO & PK Sold under PalmTrace since the last audit				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	XXX	P/C-PNK/2008/PK0041B	-	199.00
2	XXX	S/C-PSD/2006/CPO0862 S/C-PSD/2006/CPO0862 S/C-PSD/2006/CPO0862	1365.06	-
3	XXX	S/C-PSD/2006/CPO0906 S/C-PSD/2006/CPO0906 S/C-PSD/2006/CPO0906	36.15	-
Total			1401.21	199.00

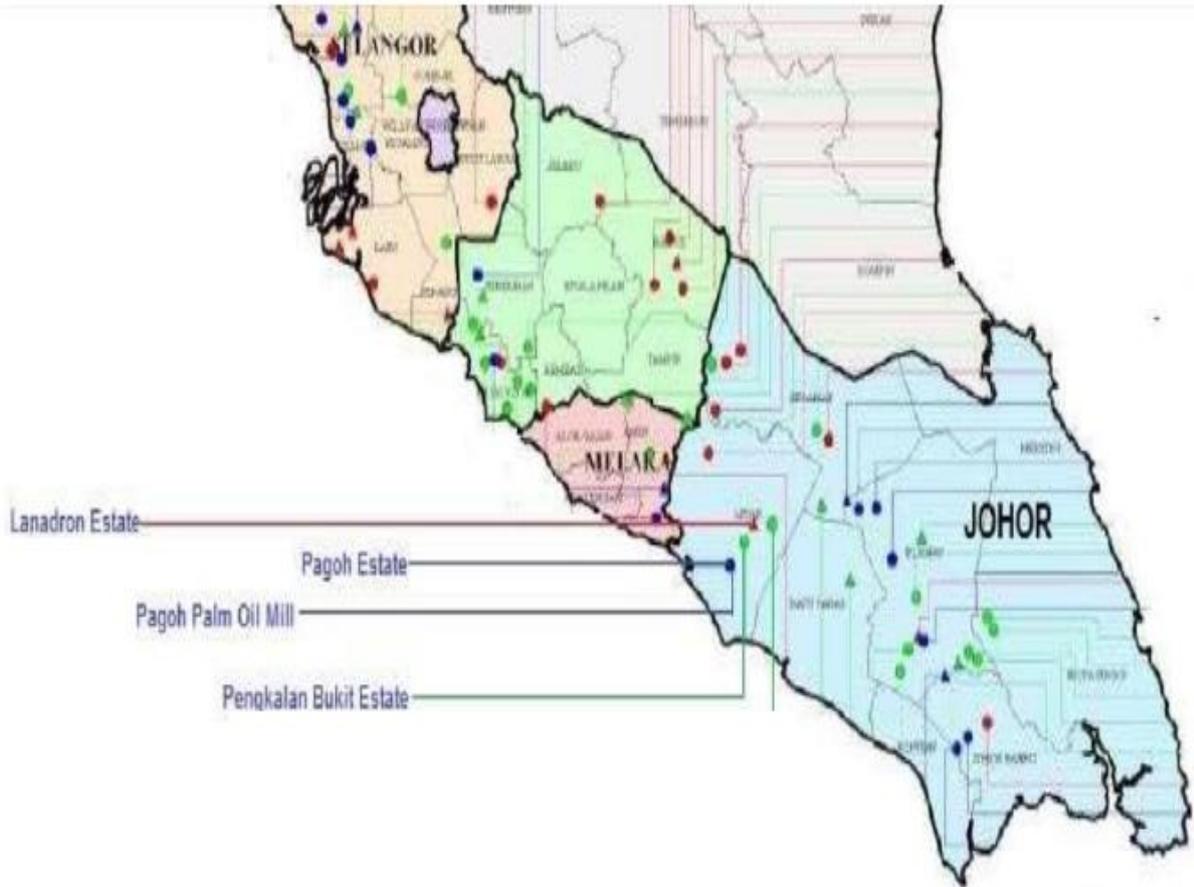
D. Records of CPO & PK Sold under other schemes since the last audit				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
NONE SOLD				

E. Records of CPO & PK Sold as conventional since the last audit				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	XXX	1,707.24	0	
2	XXX	1,678.06	0	
3	XXX	1,115.00	278.24	
4	XXX	1,185.00	436.84	
5	XXX	1,718.95	668.88	
6	XXX	1,930.00	0	
7	XXX	1,871.28	681.81	
8	XXX	1,540.45	568.11	
9	XXX	1,026.49	578.85	
10	XXX	1432.16	962.27	
11	XXX	991.39	604.61	
12	XXX	0	0	
TOTAL		16,196.02	4779.61	

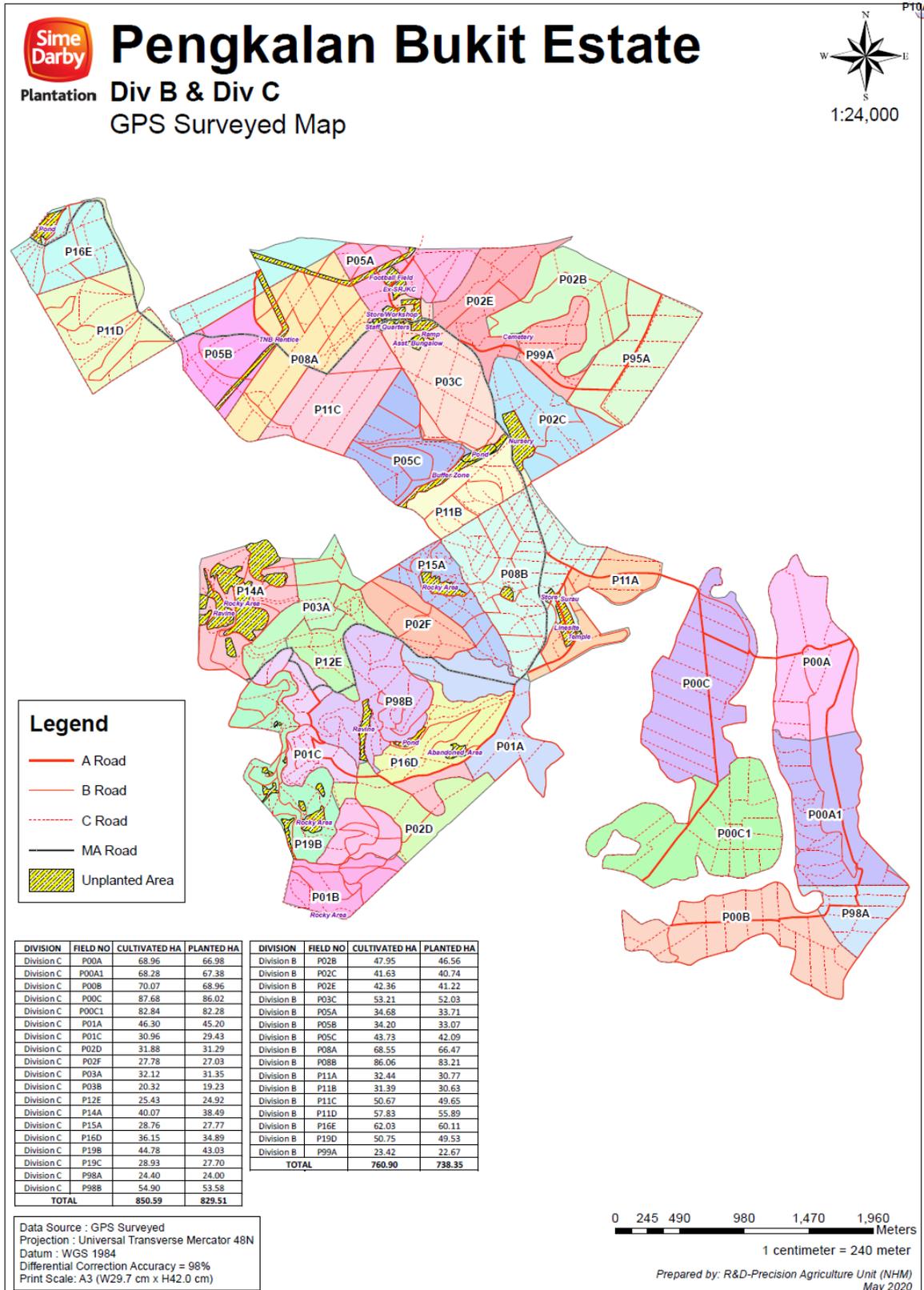
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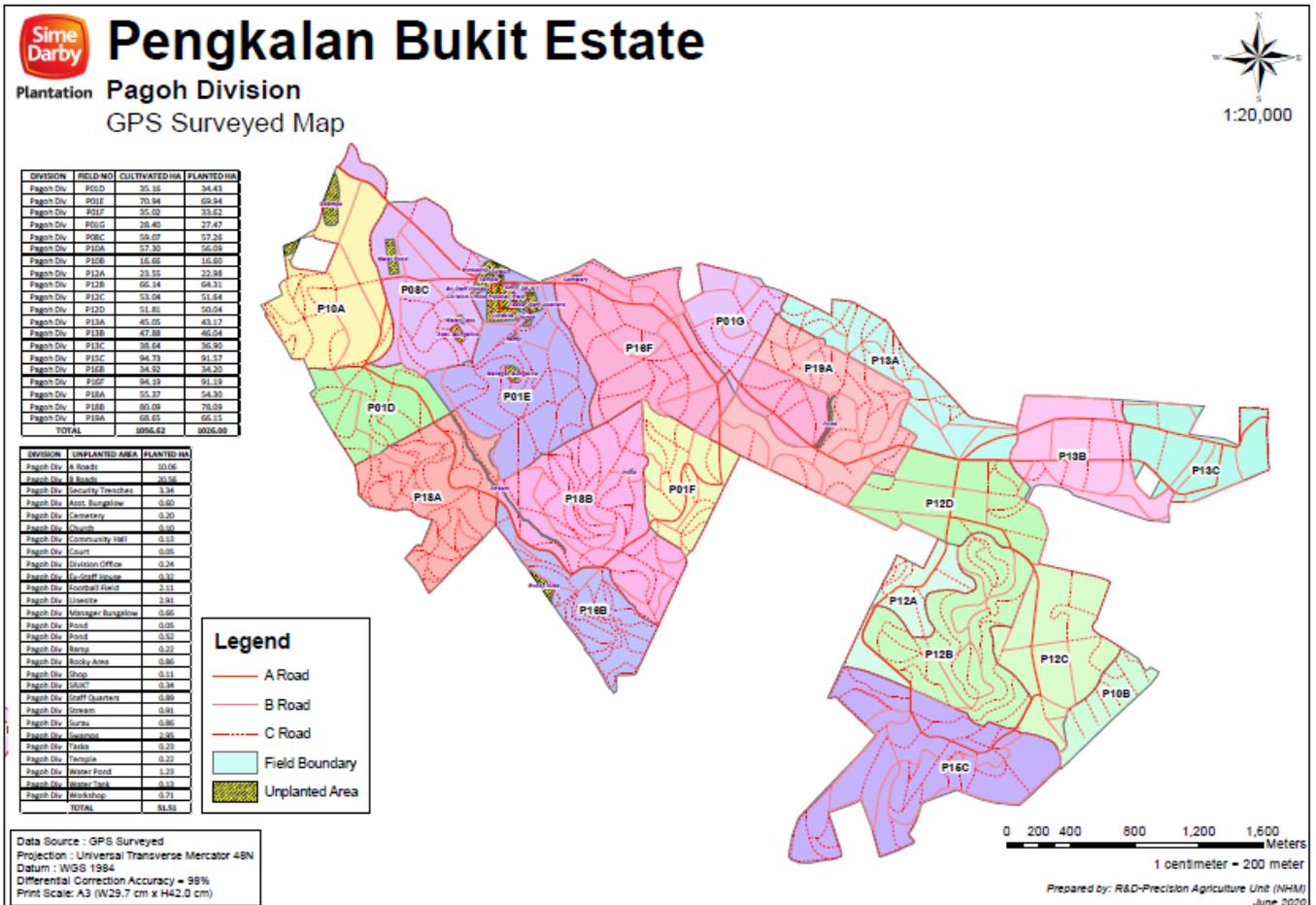
F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
NONE SOLD			

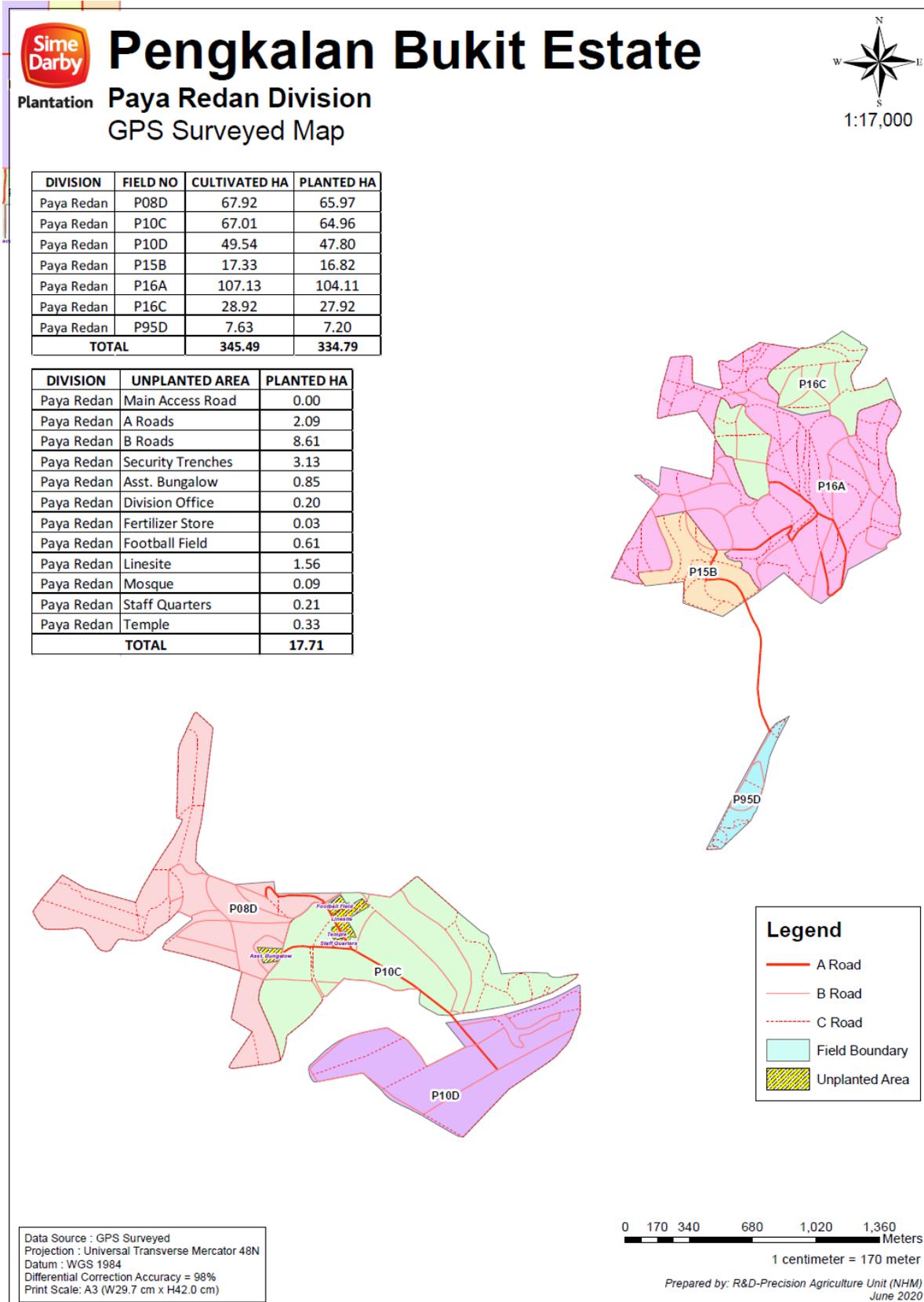
Appendix E: Location Map of Certification Unit and Supply bases

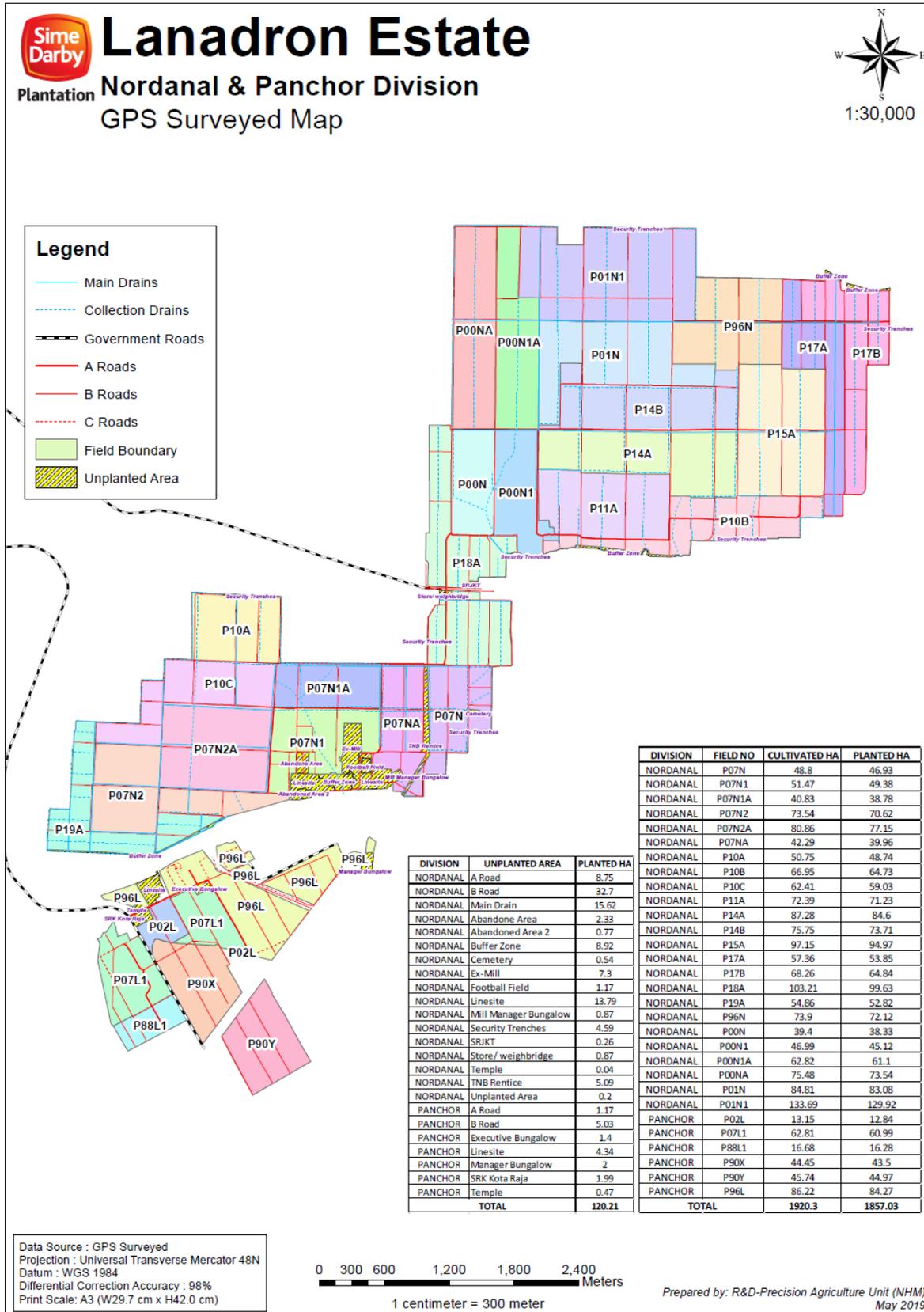


Appendix F: Estate Field Map









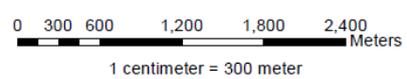
Legend

- Main Drains
- - - Collection Drains
- == Government Roads
- A Roads
- B Roads
- C Roads
- Field Boundary
- Unplanted Area

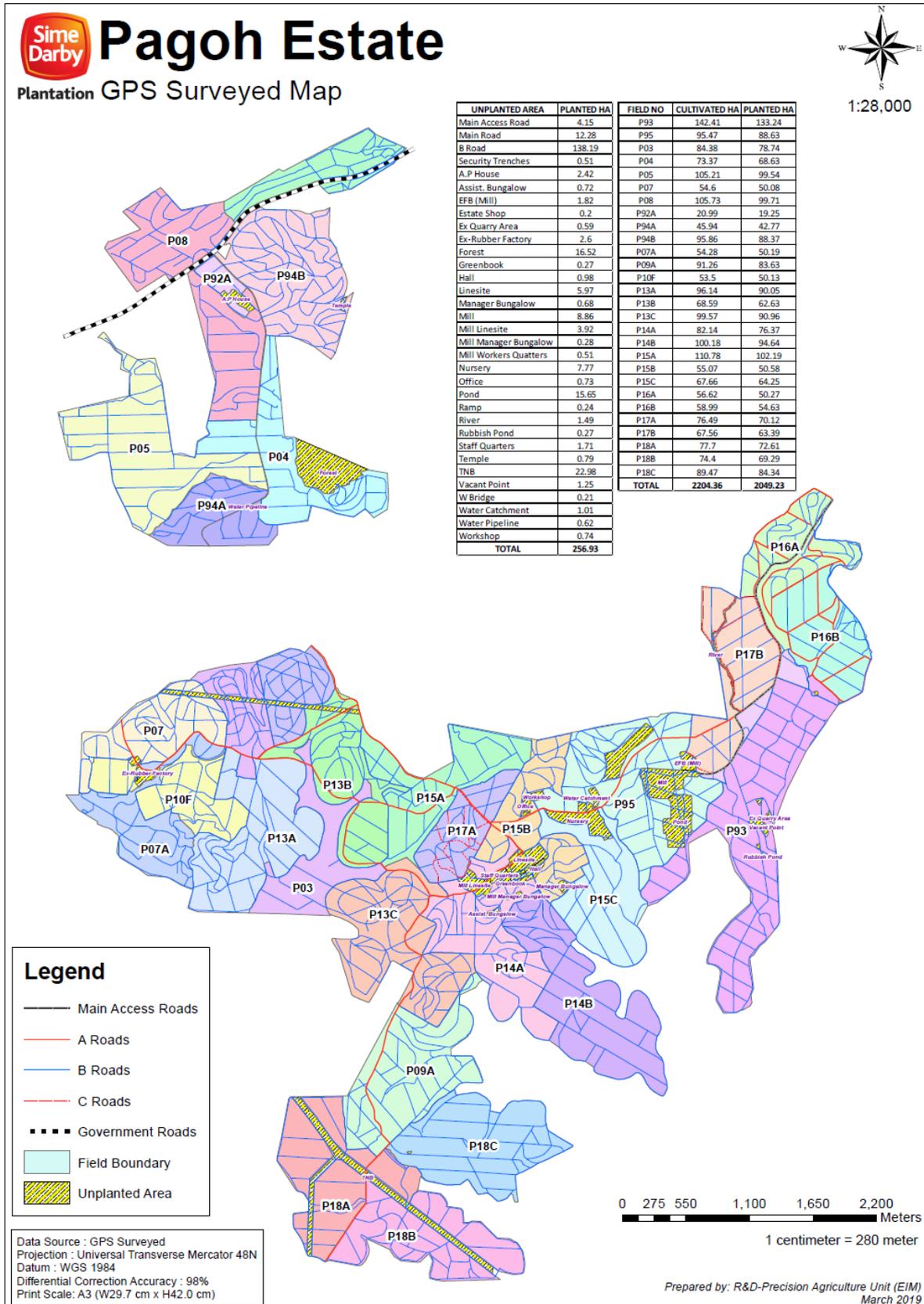
DIVISION	FIELD NO	CULTIVATED HA	PLANTED HA
NORDANAL	P07N	48.8	46.93
NORDANAL	P07N1	51.47	49.38
NORDANAL	P07N1A	40.83	38.78
NORDANAL	P07N2	73.54	70.62
NORDANAL	P07N2A	80.86	77.15
NORDANAL	P07NA	42.29	39.96
NORDANAL	P10A	50.75	48.74
NORDANAL	P10B	66.95	64.73
NORDANAL	P10C	62.41	59.03
NORDANAL	P11A	72.39	71.23
NORDANAL	P14A	87.28	84.6
NORDANAL	P14B	75.75	73.71
NORDANAL	P15A	97.15	94.97
NORDANAL	P17A	57.36	53.85
NORDANAL	P17B	68.26	64.84
NORDANAL	P18A	103.21	99.63
NORDANAL	P19A	54.86	52.82
NORDANAL	P96N	73.9	72.12
NORDANAL	P00N	39.4	38.33
NORDANAL	P00N1	46.99	45.12
NORDANAL	P00N1A	62.82	61.1
NORDANAL	P00NA	75.48	73.54
NORDANAL	P01N	84.81	83.08
NORDANAL	P01N1	133.69	129.92
PANCHOR	A Road	1.17	
PANCHOR	B Road	5.03	
PANCHOR	Executive Bungalow	1.4	
PANCHOR	Linesite	4.34	
PANCHOR	Manager Bungalow	2	
PANCHOR	SRK Kota Raja	1.99	
PANCHOR	Temple	0.47	
TOTAL		1920.3	1857.03

DIVISION	UNPLANTED AREA	PLANTED HA
NORDANAL	A Road	8.75
NORDANAL	B Road	32.7
NORDANAL	Main Drain	15.62
NORDANAL	Abandone Area	2.33
NORDANAL	Abandoned Area 2	0.77
NORDANAL	Buffer Zone	8.92
NORDANAL	Cemetery	0.54
NORDANAL	Ex-Mill	7.3
NORDANAL	Football Field	1.17
NORDANAL	Linesite	13.79
NORDANAL	Mill Manager Bungalow	0.87
NORDANAL	Security Trenches	4.59
NORDANAL	SRJKT	0.26
NORDANAL	Store/ weighbridge	0.87
NORDANAL	Temple	0.04
NORDANAL	TNB Rentice	5.09
NORDANAL	Unplanted Area	0.2
PANCHOR	A Road	1.17
PANCHOR	B Road	5.03
PANCHOR	Executive Bungalow	1.4
PANCHOR	Linesite	4.34
PANCHOR	Manager Bungalow	2
PANCHOR	SRK Kota Raja	1.99
PANCHOR	Temple	0.47
TOTAL	120.21	

Data Source : GPS Surveyed
 Projection : Universal Transverse Mercator 48N
 Datum : WGS 1984
 Differential Correction Accuracy : 98%
 Print Scale : A3 (W29.7 cm x H42.0 cm)



Prepared by: R&D-Precision Agriculture Unit (NHM)
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Appendix G: List of Smallholder Sampled

Not Applicable as there are no smallholder within the Pagoh Certification Unit.

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
SDPB	Sime Darby Plantation Berhad
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure