

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (2_2)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company name (Parent Company): Kulim (Malaysia) Berhad
Client company Address: 705, 80990 Johor Bahru, Johor, Malaysia
Certification Unit: Sindora Palm Oil Mill and Supply Bases
Location of Certification Unit: KM 23 Kluang, Jalan Kota Tinggi - Kluang, 86000 Kluang, Johor, Malaysia
Date of Final Report: 27/01/2021

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Section 1: Scope of the Certification Assessment

1. Company Details			
Parent Company	Johor Corporation		
RSPO Membership Number	1-0080-09-000-00	Membership Approval Date	15/06/2009
Address	705, 80990 Johor Bahru, Johor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Kulim (Malaysia) Berhad – Sindora Palm Oil Mill		
Location / Address	KM 23 Kluang, Jalan Kota Tinggi - Kluang, 86000 Kluang, Johor, Malaysia		
Website	www.kulim.com.my		
Management Representative	Mdm Salasah Elias	E-mail	salasih@kulim.com.my
Telephone	07- 8611611	Facsimile	07- 8631084

2. Certification Information			
Certificate Number	RSPO 612392	Date of First Certification	23/01/2009
		Certificate Start Date	23/01/2019
		Certificate Expiry Date	22/01/2024
Scope of Certification	Palm oil and Palm Kernel Production		
Visit Objectives	The objective of the assessment was to conduct annual surveillance assessment to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by the organization's management system and to confirm the forward strategic plan.		
Assessment Cycle	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Annual Surveillance Assessment (RA 2 ; 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"/> Malaysia 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		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
A116159	MS 1500:2009	JAKIM	30/06/2021
QMS 00722	ISO 9001:2015	SIRIM QAS International Sdn Bhd	21/11/2021
EU-ISCC-Cert-DE119-60202024	ISCC EU	ASG CERT	12/03/2021
EMS 00417	ISO 14001:2015	SIRIM QAS International Sdn Bhd	20/09/2022
MSPO 697951	MS2530-3 Malaysia Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	09/03/2022
MSPO 697952	MS2530-3 Malaysia Sustainable Palm Oil (MSPO) Part 3	BSI Services Malaysia Sdn Bhd	09/03/2022
BVC-MSPO/SC-0028	MSPO Supply Chain Certification Standard	Bureau Veritas Certification (M) Sdn Bhd	11/03/2021

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Sindora Palm Oil Mill	KM 23 Kluang, Jalan Kota Tinggi - Kluang, 86000 Kluang, Johor Darul Takzim	1° 59' 7.34" N	103° 27' 44.32" E
Sindora Estate	KM 23 Kluang, Jalan Kota Tinggi - Kluang, 86000 Kulai, Johor Darul Takzim	1° 57' 47.47" N	103° 27' 59.62" E
Sungai Papan Estate	KM 59 Kota Tinggi Jalan Belungkor, 81600 Pengerang, Johor Darul Takzim	1° 31' 1.25"N	104° 6' 21.81"E
REM Estate	KM 36 Johor Bahru, Jalan Johor, 81900 Kota Tinggi, Johor Darul Takzim	1°42' 12.43"N	103° 52' 54.96"E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Sindora Estate	3,655.04	20.21	243.81	3,919.06	93.26
Sungai Papan Estate	2,834.42	11.49	149.94	2,995.85	94.61

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REM Estate	1,865.95	21.75	313.85	2,201.55	84.76
Total	8,355.41	53.45	707.60	9,116.46	91.26

Note:

- i. REM Estate: Decrease of 39.41 ha in total area due to Kulim Housing Project and different of 0.84 ha in total planted due to vacant area included in field P19.
- ii. Sungai Papan Estate: Difference in figures compare to previous report due to typo error.

6. Plantings & Cycle

Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Sindora Estate	1,329.84	1,611.00	714.20	0.00	0	2,325.20	1,329.84
REM Estate	724.65	593.63	66.95	28.38	452.34	1,141.30	724.65
Sungai Papan Estate	221.12	1,241.55	1,371.75	0	0	2,613.30	221.12
Total (ha)	2,275.61	3,446.18	2,152.90	28.38	452.34	6,079.80	2,275.61

7. Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage / year			
	Estimated (Feb 20 – Jan 21)	Actual (Oct 19 – Sept 20)		Forecast (Feb 21 – Jan 22)
		Previous license period (Oct 19 – Jan 20)	Current license period (Feb 20 – Sept 20)	
Sindora Estate	54,436.00	12,664.04	43,331.24	64,584.00
REM Estate	25,164.00	7,726.86	19,017.84	27,254.00
Sungai Papan Estate	76,241.00	26,007.95	57,630.92	78,909.00
Total	155,841.00	166,378.85		170,747.00

8. Certified Tonnage of FFB (from other certified unit(s))

Estate	Tonnage / year			
	Estimated (Feb 20 – Jan 21)	Actual (Oct 19 – Sept 20)		Forecast (Feb 21 – Jan 22)
		Previous license period (Oct 19 – Jan 20)	Current license period (Feb 20 – Sept 20)	
Rengam Estate	N/A	0	494.80	N/A
Basir Ismail Estate		736.45	0	
Kuala Kabong Estate		94.95	0	

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Eng Lee Heng		0	6,360.03	
Total		7,686.23		

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Independent FFB Supplier	Tonnage / year			
	Estimated (Feb 20 – Jan 21)	Actual (Oct 19 – Sept 20)		Forecast (Feb 21 – Jan 22)
		Previous license period (Oct 19 – Jan 20)	Current license period (Feb 20 – Sept 20)	
Nilai Megah	N/A	2,757.08	5,454.10	N/A
Per. Sri Misan		4,484.05	9,150.07	
Per. Md Sangidi		3,157.82	4,330.54	
Eng Lee Heng Trading		20,881.21	36,961.57	
Choon Guan		266.84	1,134.82	
Kebun Sedenak		89.86	-	
Asam Bubok Estate		94.390	-	
Total			88,762.35	

10. Certified Tonnage				
	Estimated (Feb 20 – Jan 21)	Actual (Oct 19 – Sept 20)		Forecast (Feb 21 – Jan 22)
	FFB	FFB		FFB
Mill Capacity: 60 MT/hr	155,841.00	Previous license period (Oct 19 – Jan 20)	Current license period (Feb 20 – Sept 20)	170,747.00
		47,230.25	126,834.83	
SCC Model: MB	CPO (OER: 22.11%)	CPO (OER: 20.81)		CPO(OER: 22.22%)
	34,457.00	9,960.04	26,262.33	37,939.98
	PK (KER: 5.35%)	PK (KER: 5.00%)		PK (KER: 4.86%)
	8,331.00	2,280.42	6,419.90	8,298.30

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11. Actual Sold Volume (CPO)					
Current License period (Feb 20 – Sept 20)*					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	69.77	446.78	0	25,804.61	26,321.16
Previous License period (Oct 19 – Jan 20)					
CPO (MT)	779.24	990.48	0	7,798.26	9,567.98
Remark: Opening Stock as of February 2020: 392.06 MT					

12. Actual Sold Volume (PK)					
Current License period (Feb 20 – Sept 20)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	1,308.22	0	0	5,055.67	6,363.89
Previous License period (Oct 19 – Jan 20)					
PK (MT)	0	0	0	2,207.51	2,207.51

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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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 19-22/10/2020. 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 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. Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil 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 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.

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All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4. The major non-conformance was closed off-site due to minimal risk and it involves amendment in documentation only.

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 (RAV_2)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Sindora Palm Oil Mill	√	√	√	√	√
Sindora Estate	√	√	√	√	√
Sungai Papan Estate	√	√	√	√	√
REM Estate	√	√	√	√	√

Tentative Date of Next Visit: September 5, 2021 - September 9, 2021

Total No. of Mandays: 12 mandays

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2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Hu Ning Shing	Team Leader	She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social. She is fluent in Bahasa Malaysia and English languages.
Amir Bahari	Team Member	He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and estates best practices, workers consultation and occupational safety & health. He is fluent in both verbal/written in Bahasa Malaysia and English.
Ragu Samy A Erulappan	Team Member	Ragu Erulappan is a fulltime employee with BSI Services Malaysia. He graduated from University Technology Malaysia. He attended internal RSPO training in 22 December 2014. He has completed ISO 9001:2008 Quality Management System Lead Auditor training, ISO 14001, ISO 18001 Lead Auditor Training. Currently he is an ISO 9001:2008, ISO 14001, ISO 18001, C-TPAT (Supply Chain Security) and GDPMD (Good Distribution Practice for Medical Devices) Lead Auditor. He has more than 5 years of auditing experience since August 2010 covering Environment, Safety and Health, Legal aspects in various industries. He is involved as Environment, Safety and Health Auditor during the RSPO Assessment. For this assessment he assesses Mill and Estate OSH, best practices and legal aspects. He is able to speak and understand Bahasa Malaysia, English and Tamil.

Accompanying Persons:

Name	Role
Not Applicable	

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2.3 Assessment Plan

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

Date	Time	Subjects	HNS	AB	RS
Sunday, 18/10/2020	PM	Auditors travel to Mutiara Hotel, JB	√	√	√
Monday, 19/10/2020 Sindora Palm Oil Mill	0830 - 0900	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). • Verification on previous audit findings 	√	√	√
	0900 - 1200	Sindora Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area.	√	√	√
	1000 – 1100	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	1200 - 1300	Lunch	√	√	√
	1300 - 1630	Sindora Palm Oil Mill Document Review P1 – P7: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc.	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
Tuesday, 20/10/2020 Sindora Estate	0830 - 1200	Sindora 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.	√	√	√
	1200 – 1300	Lunch	√	√	√
	1300 - 1630	Sindora 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).	√	√	√

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Date	Time	Subjects	HNS	AB	RS
	1630 - 1700	Interim Closing Briefing	√	√	√
Wednesday, 21/10/2020	0830 - 1200	REM 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.	√	√	√
	1200 – 1300	Lunch	√	√	√
	1300 - 1630	REM Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	1630 - 1730	Interim Closing Briefing	√	√	√
Thursday, 22/10/2020	0830 - 1200	Sungai Papan 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.	√	√	√
	1200 – 1300	Lunch	√	√	√
	1300 - 1600	Sungai Papan 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).	√	√	√
	1600 - 1630	Verify any outstanding issues & Preparation for closing Meeting	√	√	√
	1630 - 1730	Closing Meeting	√	√	√

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

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

3.2 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	Yes, the plan includes all current subsidiaries, estates and mills that is under management control. Bukit Layang Estate has been certified with RSPO in April 2020 and Eng Lee Heng has been certified with RSPO under Wild Asia Group Scheme in May 2020. PT TPR and PT RAJ is now under rehabilitation process.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	Yes, all the estates and mills certified within 5 years after obtaining RSPO membership. Only Indonesian units, PT RAJ & PT TPR have not been certified yet and is proposed to be certified in 2021.	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	No. There have not been any new acquisitions.	Yes
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?	There have been no changes to the time bound plan since all the estates and mill under Johor Corporation are already RSPO certified. This is consistent with the RSPO ACOP reporting. The link provided below: https://rspo.org/members/310/Johor-Corporation	Yes
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	There is no isolated lapse in Time Bound Plan except for smallholder proposed certification program that halted due to unstable supply to the mill.	Yes
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to	There has been no fundamental failure to proceed with the implementation of the plan.	Yes

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proceed with implementation of the plan? If yes a Major non-compliance shall be raised		
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3: <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. 	As of to date there are no new plantings that replace primary forest under Johor Corporation.	Yes
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	There are no new plantings since January 1 st 2010 at Johor Corporation estates.	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 conflict under all certification units as verified through RSPO RaCP tracker.	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labour dispute within all certification units.	Yes
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance within all certification units.	Yes
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	RSPO internal audit assessment for all uncertified units been conducted and the report had been submitted to all unit for improvement plan. The report indicated no systematic failures to proceed with implementation that should be raised as major nonconformities.	Yes
Have there been any stakeholder (including NGO) consultation conducted?	Stakeholder Meeting was conducted on 27/08/2020 for Sindora Complex. Seen the attendance list of the stakeholder found that government authorities, local communities, FFB suppliers, neighboring plantation, contractors and suppliers were participated in the meeting. 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 are no scheme smallholders or scheme outgrowers under the certification unit.	Yes

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 and two (2) Minor nonconformities raised. The Sindora Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the 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 #	1968123-202010-M1	Clause & Category (Critical / Minor)	6.2.2 (Critical)
Date Issued	22/10/2020	Due Date	20/01/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	14/01/2021
Statement of Nonconformity:	Employment contracts 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) were not outlined accordingly.		
Requirement Reference:	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.		
Objective Evidence:	Sungai Papan Estate: 9 employment contracts signed by the contractor's workers (Passport No.: B5356944, C2150443, C3814674, B572100, C2150442, C5722849, B9965016, B9965021, C3816201) were sampled and found that terms and conditions below		

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	<p>were not stated accordingly and correctly.</p> <ul style="list-style-type: none"> i. Rest day on Sunday whereas actual rest day was Saturday ii. Period of notice from workers iii. Clause 21 (d) where workers need to pay the balance of levy to the employer if they terminate the contract before the end of 2 years' contract iv. Job title as General Worker whereas actual was Harvester
Corrections:	The said contractor had been given refresher 23rd October 2020 about Employment contracts with proper term & condition 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) as per outlined accordingly in sampled Employment Contract used by KULIM.
Root Cause Analysis:	<p>The said contractor is from Melaka that observe Sunday not Saturday as rest day for the workers.</p> <p>The terms and condition of the workers Employment Contract was copied and paste from their Company copy not as per KULIM' sample of Employment Contract that has all TOR stated.</p>
Corrective Actions:	<p>KULIM has conducted Contractors' engagement for all Operating Units on 15 October 2020.</p> <p>Estate to brief relevant Contractors on Employment Contract Guidelines communicated on 15 October 2020 by Plantation Div.</p> <p>Estate will assign PIC to in-charge of monitoring all matters pertaining to Contract' Workers from the list of worker assigned to the estate, employment letter, work permit and the payments that involved this group.</p>
Assessment Conclusion:	<p>The contractor has revised the employment contract for his workers to include the notice period and revised the rest day to Saturday and job title as harvester. Besides, the clause for the levy payment was eliminated from the contract. Sampled of the employment contracts as below:</p> <ul style="list-style-type: none"> i. Passport No.: B9965021 ii. Passport No.: C3814674 iii. Passport No.: B5356944 <p>Besides, a meeting with contractors on workers wages was conducted on 15/10/2020. Seen the meeting materials and attendance list of the meeting. Responsibilities of contractors, Employment Act 1955 and Addendum Contract Agreements were briefed during the meeting. In additional, Senior Manager of Sungai Papan Estate has appointed Assistant Manager as a person in charge to monitor matters pertaining contract workers and appointment letter dated 01/11/2020 was sighted. Roles and responsibilities of the person in charge was outlined in the appointment letter.</p> <p>The implementation of the corrective action was found effective. Thus, the major non-conformance was closed on 14/01/2021.</p>

Non-conformity			
NCR Ref #	1968123-202010-N1	Clause & Category (Critical / Minor)	2.2.2 (Minor)

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Date Issued	22/10/2020	Due Date	Next surveillance assessment														
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"														
Statement of Nonconformity:	The contractors engaged by the company were not able to demonstrate the compliance of legal requirements as stated in the agreement.																
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>Sungai Papan Estate:</p> <p>a) Sampled the payslips for contractor's workers found that they worked on paid public holiday without paid twice the ordinary rate per piece as verified through the Workers Attendance Card by the contractor as below:</p> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>I/C No.:</th> <th>Work on Public Holiday</th> </tr> </thead> <tbody> <tr> <td>690316-01-52XX</td> <td>21/08/2020</td> </tr> <tr> <td>731122-01-50XX</td> <td>31/08/2020</td> </tr> <tr> <td>631110-71-58XX</td> <td>16/09/2020</td> </tr> <tr> <td>990417-01-79XX</td> <td>24/09/2020</td> </tr> <tr> <td>940610-01-50XX</td> <td></td> </tr> <tr> <td>750428-01-73XX</td> <td></td> </tr> </tbody> </table> <p>b) Besides, there was only 1 day paid holiday paid to the workers above for August 2020 and September 2020 whereas there were 2 days of paid holiday on the respective months.</p> <p>c) PPE compliance among the outsourced FFB harvesting contractor workers at P12/B2 was not adequately complied. During the outsourced FFB harvesting field activity visit at P12/B2, noticed 2 harvesting workers wearing short pants and 4 harvesting workers not wearing safety rubber boots during at work.</p>			I/C No.:	Work on Public Holiday	690316-01-52XX	21/08/2020	731122-01-50XX	31/08/2020	631110-71-58XX	16/09/2020	990417-01-79XX	24/09/2020	940610-01-50XX		750428-01-73XX	
I/C No.:	Work on Public Holiday																
690316-01-52XX	21/08/2020																
731122-01-50XX	31/08/2020																
631110-71-58XX	16/09/2020																
990417-01-79XX	24/09/2020																
940610-01-50XX																	
750428-01-73XX																	
Corrections:	<p>a) Arrears will be paid for the underpaid public holiday for the month of August and September.</p> <p>b) The arrears will appear in October pay (pay slip needed) slips of the said worker.</p> <p>c) Refresher training had been given to them on 23rd October 2020 about the importance of wearing the right PPE. The estate will perform checking of each contract harvester to ensure they received the PPE during muster roll call.</p>																
Root Cause Analysis:	The contractor was not adequately brief on legal requirement by estate management.																
Corrective Actions:	a) Estate to provide and brief relevant Contractors on legal requirement on Guideline for payment of Contractors Workers communicated on 15 October 2020 by Plantation Div.																

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	<p>b) Estate will assign PIC to in-charge of monitoring all matters pertaining to Contract' Workers from the list of worker assigned to the estate, employment letter, work permit and the payments that involved this group. Monthly pay slip will be given to the operating unit for monitoring purposes to ensure fully compliance of the contractor.</p> <p>c) Estate to include muster/roll-call for Contractors workers effective immediately in order to have better understanding and communication of information given by the management to comply with company OSH policy and legal requirement as per stated in contract agreement. Estate to establish checklist on PPE checking before workers start their daily work.</p>
Assessment Conclusion:	The corrective action plan is accepted. Implementation of the corrective action will be verified during the next assessment.

Non-conformity			
NCR Ref #	1968123-202010-N2	Clause & Category (Critical / Minor)	3.3.2 (Minor)
Date Issued	22/10/2020	Due Date	Next surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	Mechanism to check implementation of procedures was not consistent.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	Sindora Estate: 1 unit of first aid kit containing first aid materials including expired oral medications and expired eye wash solution was found kept alongside with 1 unit of latest inspected & valid content first aid kit in the school bus.		
Corrections:	The expired oral medications and expired eye wash solution had been removed. MA had conducted the refresher 1st aid training for the bus driver and his co-driver on 21/10/20 at 4.00pm-5.30 pm		
Root Cause Analysis:	MA was not following the procedure to regularly check the first aid kit as per stated in Work Instruction/ Procedure (by monthly basis)		
Corrective Actions:	The bus driver is a 1st aider. Monthly refresher training on Work Instruction / Procedure which includes first aid treatment, inspection, refilling and returning process will be conducted by MA involving all 1st aider on 21.10.2020. MA will establish checklist to monitor all 1st aid box submitted by 1st Aider by monthly.		
Assessment Conclusion:	The corrective action plan is accepted. Implementation of the corrective action will be verified during the next assessment.		

Positive Findings	
PF #	Description
PF 1	Good commitment from the management to maintain the system.

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	N/A	Clause & Category (Critical / Minor)	N/A
Closed (Yes / No)	N/A	Date of nonconformity Closure	N/A
Statement of Nonconformity:	N/A		
Requirement Reference:	N/A		
Objective Evidence:	N/A		
Corrective Actions:	N/A		
Assessment Conclusion:	N/A		

Opportunity for Improvement	
OFI#	Description
OFI 1	<p>1831667-201906-I1 Indicator 4.7.2 Details : To update and ensure the procedure on safety was properly documented.</p> <p>Verification ASA2_2, Verified that the procedure on safety was properly updated and documented in the mill and estates. Verified also that there was no repetitive of similar issue during this assessment visit. Therefore, this Opportunity for Improvement raised during the previous assessment has been verified and closed effectively on 22/10/2020.</p>
OFI 2	<p>1831667-201906-I2 Indicator 5.6.3 Details: The value claimed for "sale of excess PKS for energy production" reported in RSPO GHG calculator can be further improved by obtaining verifiable documents to ensure that the sold excess PKS was really used for energy production.</p> <p>Verification ASA2_2, KMB has verified the purpose of the PKS sold via email dated 07/10/20 to buyer M/s TME BIO Resources Sdn Bhd whom has confirmed that the PKS was meant for biomass fuels. The document was checked and verified. Opportunity for Improvement raised during the previous assessment has been verified and closed effectively on 22/10/2020.</p>

OFI 3	<p>1831667-201906-I3 Indicator 6.5.2 Details: To improve the effectiveness of the explanation given to workers on the option given for workers to either keep their own passport, or to keep their passports at the estate office.</p> <p>Verification ASA2_2, Interviewed with the workers confirmed that they were briefed on the freedom to keep their passport or surrender to the management for safe keeping. Opportunity for Improvement raised during the previous assessment has been verified and closed effectively on 22/10/2020.</p>
OFI 4	<p>1831667-201906-I4 Indicator 6.10.3 Details: To ensure contractors' understanding of all the terms and conditions of the contracts they enter into, in particular contracts prepared in English; a language they are not conversant in.</p> <p>Verification ASA2_2, Stakeholder meeting was held on 27/8/2020 on Group basis. Attendance by Contractors and small holders were sighted and verified. The agenda discussed, among others covers the following; <ul style="list-style-type: none"> a) Pematuhan Kontraktor untuk mematuhi semua undang-undang di Sykt b) Larangan kanak-kanak, buruh paksa and pemerdagangan manusia c) Mengikuti & menyelesaikan penilaian "due deligence" d) Beroperasi secara sah dan menghormati hak. The members noted to made discussion and explanantion on the understanding of the issues briefed. Opportunity for Improvement raised during the previous assessment has been verified and closed effectively on 22/10/2020.</p>

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1692268-201809-M1	Major	5.3.1	05/10/2018	Closed out on 02/01/2019
1692268-201809-M2	Major	5.4.2	05/10/2018	Closed out on 02/01/2019
1692268-201809-M3	Major	2.1.1	05/10/2018	Closed out on 02/01/2019
1692268-201809-N1	Minor	4.7.5	05/10/2018	Closed out on 08/10/2019
1692268-201809-N1	Minor	4.1.3	05/10/2018	Closed out on 08/10/2019
1968123-202010-M1	Critical	6.2.2	22/10/2020	Closed out on 14/01/2021
1968123-202010-N1	Minor	2.2.2	22/10/2020	"Open"
1968123-202010-N2	Minor	3.3.2	22/10/2020	"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 Sindora 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 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 Local communities representatives Gender Committee representatives Workers' representatives	Union/Contractors Contractors
Government Departments School's representative	NGO NIL

Stakeholders comment	
1	<p>Feedbacks: Local community representative –They have good relationship with the management and the management will aid whenever they requested for help. They informed that the operations in the estates and mill have not affected their daily life. They are aware of the complaint procedures and the management has briefed them on the company new policies. No land dispute case reported so far. Trenches were constructed to demarcate the boundaries.</p> <p>Management Responses: The management will continue to maintain good relationship with the local communities.</p> <p>Audit Team Findings: No further issue.</p>
2	<p>Feedbacks: Gender Committee Representatives & Female Workers –They were briefed on the new mother's requirements for specific needs and consultation have been conducted by the management. They informed that those who handle chemical found pregnant will be transferred to other job stations that not hazard to the worker. They allow to go back for breastfeeding during working hour in case they need. They also</p>

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	<p>informed that no case of sexual harassment and violence reported. They are aware of their rights of reproductive. No discrimination occurred. Female workers are paying the same as male workers.</p> <p>Management Responses: The management will ensure that no pregnant female worker is handling chemical and hazardous work.</p> <p>Audit Team Findings: No other issue.</p>
3	<p>Feedbacks: Workers’ Representatives – They have informed that no salary deduction during the MCO period and wages was paid as per the regulations. They are aware and understand the complaint procedure and rights of them. There was no issue raised by the workers. They were treated equally without any discrimination of gender and nationality. Overtime is voluntarily basis.</p> <p>Management Responses: The management will ensure the compliance of legal requirements.</p> <p>Audit Team Findings: No other issue.</p>
4	<p>Feedbacks: School’s representative– He informed that the relationship between school and estate’s management is good. The management will be aided such as grass cutting whenever they requested. Maintenance in the school will be done by estate’s management if they requested. No complaint has been lodged.</p> <p>Management Responses: The management will continue to support and maintain good relationship.</p> <p>Audit Team Findings: No other issue.</p>
5	<p>Feedbacks: Contractors – They informed that payment was made promptly without delay. Agreement was signed, and they were briefed on the company new policies as well. They are aware of the complaint procedure. No issue with the management at this moment.</p> <p>Management Responses: The management will continue to maintain good relationship.</p> <p>Audit Team Findings: No other issue.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not applicable as the company has acquired and planted since Year 1968.					

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

3.6 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

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 Sindora Palm Oil Mill Certification Unit has complied with the Malaysia National Interpretation 2019 for RSPO P&C 2018 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 Sindora Palm Oil Mill Certification Unit is continued.

Report prepared by	Acceptance of Assessment Conclusion
Name: Hu Ning Shing	Name: Salasah Elias
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: Kulim (Malaysia) Berhad
Title: Lead Auditor	Title: Deputy General Manager
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 14/01/2021	Date: 17/01/2021

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>KULIM (M) Berhad has developed Transparency Procedure with Doc. No.: SQD/SMS/1.0 dated 01/08/2020 where operating units to provide adequate information when requested by stakeholders on sustainability, social and legal issues when appropriate.</p> <p>The documents may be publicly available but not limited to are such as:</p> <ul style="list-style-type: none"> i. Land title ii. OSH plan iii. Plans and impact assessment relating to environmental and social impacts iv. HCV documentation v. Pollution prevention and reduction plans vi. Complaint and grievances details vii. Human Rights policy viii. Procedure for negotiation on compensation ix. Results of FPIC processes x. HCS documentation xi. Continuous Improvement Plan xii. Report on the progress of smallholder support programme 	Complied

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		<p>Besides, the stakeholders could access to company's website, http://www.kulim.com.my/ to get the information such as annual report.</p> <p>The stakeholders have been briefed on the request of publicly available documents during the stakeholder meeting conducted on 27/08/2020 as verified in the meeting presentation slides.</p>	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>The stakeholders have been briefed on the request of publicly available documents during the stakeholder meeting conducted on 27/08/2020 as verified in the meeting presentation slides in Bahasa Malaysia. All the relevant documents were in Bahasa Malaysia and English.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>All the request will be recorded in the Enquiry Register book as written in the procedure above. All the operating units in Sindora Complex have implemented Enquiry Register Book. Seen the Enquiry Register book in Sindora POM found that most of the requests were related to compliance inspection from government authorities such as DOE. Records of the inspection from DOE were properly maintained.</p>	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>KULIM (M) Berhad has established Consultation and Communication Procedure with Doc. No.: SQD/SMS/1.1 dated 01/08/2020 to ensure KULIM has an open and transparent communication methods with local communities and other internal & external stakeholders. Modes of the communication are such as muster, meetings, campaigns, suggestion boxes, letter, email, social media and face to face communication. Any request for information that publicly available and grievance shall record in Enquiry Register.</p>	Complied

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		<p>Stakeholder Meeting was conducted on 27/08/2020 for Sindora Complex. Seen the attendance list of the stakeholder found that government authorities, local communities, FFB suppliers, neighboring plantation, contractors and suppliers were participated in the meeting. Meeting minutes and presentation slides were reviewed and questions from stakeholders were recorded in the minutes.</p> <p>All RC Executives will be appointed automatically as Social Person In-Charge in the complex and appointment letter dated 21/09/2020 was sighted.</p> <p>Senior Manager of Sindora POM has appointed the Supervisor as Social Person In-Charge on site and appointment letter dated 10/01/2020 was available.</p> <p>Senior Assistant Manager of Sindora Estate has been appointed as Social Person In-Charge and appointment letter dated 01/01/2019 was sighted.</p> <p>2nd Clerk of REM Estate has been appointed as Social Person In-Charge by the Estate Manager and appointment letter dated 01/08/2020 was sighted.</p> <p>Assistant Manager of Sungai Papan Estate has been appointed as Social Person In-Charge by the Senior Manager with appointment letter dated 01/01/2020 was sighted.</p>	
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1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Stakeholder list was developed in all operating units where stakeholders such as government authorities, contractors, suppliers, local communities, neighbouring plantations and NGO was included with details and nominated representatives.	Complied
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 -	Mill and Estates within the Sindora Complex subscribe to Kulim (Malaysia) Berhad Corporate Integrity Pledge signed by its Executive Director dated 15 November 2018. Additionally, there are also the following policies of Kulim (Malaysia) Berhad: a) Ethics Policy available dated 1/05/18 signed by Executive Director. b) No Gift and Entertainment Policy; and c) Conflict of Interest Policy. These Policies were signed by its Executive Director on 1 May 2018 and communicated to all levels of workforce during morning assemblies e.g. Sindora Palm Oil Mill (06/09/2020), REM Estate (03/09/2020) and Sungai Papan Estate (08/04/2020). Interviews conducted with workers at the Mill and Estates confirmed their understanding of this ethical conduct and integrity requirements.	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 -	Sindora Complex has a system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. The monitoring mechanism includes annual Internal Audits by HQ Sustainability Department team in the mill and estates.	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			

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<p>2.1.1</p>	<p>(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -</p>	<p>Sindora POM and Sindora Estate has obtained approval for deduction of wages from Jabatan Tenaga Kerja Negeri Johor as below:</p> <ul style="list-style-type: none"> i. Ref. No.: TK (NJ) U -23 dated 23/12/2018 for electricity after subsidized for RM 10/ per worker and RM 50 for family. ii. Ref. No.: TK (NJ) U -23 dated 23/12/2018 for water after subsidized for RM 20/ per worker and RM 60 for family. iii. Ref. No.: TK (NJ) U -23 dated 31/03/2019 for sport and recreational club fee not more than RM 10. <p>Besides, approval of overtime and female workers work after 10pm was obtained from Jabatan Tenaga Kerja Semenanjung Malaysia as below:</p> <ul style="list-style-type: none"> i. Ref. No.: BHG PU/9/135 Jld 17 (13) dated 23/01/2019 to allow female workers to work from 10 pm to 5 am. ii. Ref. No.: BHG.PU/9/134 Jld.31(14) dated 30/07/2020 for maximum overtime of 130 hours. <p>REM Estate has obtained approval from Jabatan Tenaga Kerja Semenanjung Malaysia and Jabatan Tenaga Kerja Negeri Johor as below:</p> <ul style="list-style-type: none"> i. Serial No.: PP3/29/113/2004 for school bus fare not more than RM 20 which valid from 01/10/2004. ii. Serial No.: PP3/29/110/2004 for temple/ mosque fund not more than RM 3 which valid from 01/10/2004. iii. Serial No.: PP3/29/109/2004 for water bill not more than RM 50 which valid from 01/10/2004. iv. Serial No.: PP3/29/108/2004 for electricity bill not more than RM 50 which valid from 01/10/2004. 	<p>Complied</p>
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		<ul style="list-style-type: none"> v. Ref. No.: TK (NJ) U -21 dated 31/03/2019 for sport and recreational club fee not more than RM 10. vi. Ref. No.: TK (NJ) U -21 dated 31/03/2019 for Skim Khairat Keluarga Perbadanan Johor for RM 5 and premium not more than RM 37.50. vii. Ref. No.: TK (NJ) U -21 dated 31/03/2019 for medical fee which more than subsidized. <p>The mill and estates in the Sindora Complex continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and SQD personnel. The OU had obtained and renewed license and permits as required</p>	
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		by the law. Among others the licenses/permit viewed were as below:	
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Permit/license	validity
Sindora Estate	
1 License Air Compressor JH PMT 22736	10/12/2020
2 Permit storage diesel 15000L, J 000578	23/04/2021
3 MPOB license no: 5018630-2000	30/11/20
4 JTK Ref TK NJ U -23 Potongan Upah	Effective 31/03/2019
5 S/Tenaga ref 11/2/4/1/2014	Effective 16/07/2014
REM Estate	
1 License Air receiver, JH PMT 72241	16/09/2020
3 MPOB license no: 50125-900-2000	31/03/2021
4 KPDNKK 0040 permit khas barangan b/jadual.	14/07/2021
5 JTK Potongan Gaji PP3/29	Effective Oct 2004
6 Metrology Corporation ref. 8145-7551	14/05/2020
Sg Papan Estate	
1 License Air compressor JH PMT 3886	10/12/2020
2 Permit to storage diesel 10500 L ref J001289	09/03/2021

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		3	MPOB license no: 570243-000-2000	28/01/2021		
		4	Metrology Corporation ref. JJB-ATR 003475	14/07/2021		
			Sindora Palm Oil Mill			
		1	MPOB license: 500263-204000	30/06/2-21		
		2	Water tube boiler –JH PMD 2038	30/09/2021		
		3	Water tube boiler –JH PMD 1436	26/04/2021		
		4	Air Receiver tank – JH PMT 20895	26/04/2021		
		5	Steriliser no 1 JH PMT 107561	26/04/2021		
		6	Steriliser no 3 JH 124369	26/04/2021		
		7	Air Compressor – PMT30516	26/04/2021		
		8	KPDNKK Permit diesel storage - J038002	26/01/2021		
		9	BAKAJ - SAJ34/300	31/12/2020		
		10	Lesen Pemasangan Bekalan Elektrik 02441	05/10/2021		
		11	Meterology Corporation JKL-ATK 110780	13/05/2021		
		12	Meterology Corporation JKL-ATK 008755	18/09/2021		
		13	KWSP ref 012238916	Effective 18/08/1998		
		Factory and Machinery Act 1967 –				

The following competency requirements were verified:

	Competent person	
1	Steam engineer	1st grade – 1 /2nd grade 2
2	Engine Driver (BHC)	3- 2nd grade
3	Boilermen	2 1st grade
4	AESP (Authorised Entrant and Standby Person for Confined Space)	3 competent persons
5	AGT (Authorised Gas Tester and Entry Supervisor for Confined Space)	2 competent person
6	ICE driver	3 - 2nd grade
7	Electrical Chargemen	One A4 Chargemen
8	CePSWaM	3 competent persons
9	CePPOME	3 competent persons

Air Monitoring

- a) Black smoke – The smoke density indicator alarm for boiler no.3 was functioning during site review at SPOM.
- b) Particulate – Stack sampling was carried out on quarterly basis for both boilers recent dated on 06/7/2020.
- c) Noted that monitoring was conducted on (at 12.0%) CO2.

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		<table border="1" data-bbox="1198 400 1912 533"> <thead> <tr> <th>Boiler no</th> <th>Date</th> <th>Dust concentration</th> <th>EQA std</th> </tr> </thead> <tbody> <tr> <td>PMD 1436 No3</td> <td>06/07/2020</td> <td>28 mg/m3</td> <td>150 mg/m3</td> </tr> </tbody> </table> <p>Ambient Air Quality Monitoring</p> <table border="1" data-bbox="1198 639 1892 772"> <thead> <tr> <th></th> <th>Date</th> <th>Total suspended particulate</th> <th>MAAQ std</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>11/08/2020</td> <td>22 ug/m3</td> <td>120 ug/m3</td> </tr> </tbody> </table> <p>The stack sampling was carried out by PAC Testing & Consulting Sdn Bhd. The mill has taken action in installing ESP in July 2020. REM estate had a deferment in the weighbridge verification due to postponement by the Metrology Corporation. DOSH inspection for the air compressor was also delayed to a later month in view of the movement restriction MCO. Correspondence was sighted and verified.</p>	Boiler no	Date	Dust concentration	EQA std	PMD 1436 No3	06/07/2020	28 mg/m3	150 mg/m3		Date	Total suspended particulate	MAAQ std	1	11/08/2020	22 ug/m3	120 ug/m3	
Boiler no	Date	Dust concentration	EQA std																
PMD 1436 No3	06/07/2020	28 mg/m3	150 mg/m3																
	Date	Total suspended particulate	MAAQ std																
1	11/08/2020	22 ug/m3	120 ug/m3																
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>The Sindora Complex continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them.</p> <p>a) Each estate and mill had its own Legal and Other Requirements Register (LORR) and were being evaluated individually annually for compliance. The legal registers were updated by the person in-charge and approved by the respective managers.</p>	Complied																

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- b) The SQD Department is responsible to track changes and the information was disseminated to all its plantations and Mill department. Among the applicable legal and included in the legal register are
- Pesticides Act 1974 and Regulations,
 - Environmental Quality Act 1974 and Regulations,
 - Factories and Machinery Act 1967 and Regulations,
 - Occupational Safety and Health Act 1994,
 - Employment Act 1955,
 - Energy Commission Act 2010.
 - Aboriginal Peoples Act 1954,
 - Company Act 2016
 - Personal Data Protection Act 2010.
 - Industrial Relations Act 1967,
 - Children and Young Persons (Employment) Act 1966
 - MPOB Regulations (Licensing) 2005.
 - Min retirement age Act 2012
 - Passport Act 1996
 - Anti Corruption Commission Amendment 2018
- c) The latest legal register update by SQD is listed below;

Rev date	Title	Remarks
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		1	31/8/20 20	DOE - Jadual Pematuhan	Revision																																					
		2	31/8/20 20	Perintah Kaw Pergerakan 2020	Newly added																																					
		3	31/8/20 20	Akta Pencegahan/Pengawalan Penyakit Berjangkit	Newly added																																					
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 3 estates, during the field inspection confirmed that they were clearly marked and maintained. All the physical markers/Boundary stones along the legal boundaries between was visibly available.</p> <table border="1" data-bbox="1153 879 1883 1358"> <thead> <tr> <th></th> <th>Estate</th> <th>Boundary</th> <th>Neighbouring Unit</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Sindora</td> <td>P14 Blk 1</td> <td>FGV Bukit Tongkat</td> </tr> <tr> <td>2</td> <td>Sindora</td> <td>P16A Blk 4</td> <td>Tanah KEJORA</td> </tr> <tr> <td>3</td> <td>Sindora</td> <td>P06 Blk 1</td> <td>TH Bkt Lawiang</td> </tr> <tr> <td>4</td> <td>REM</td> <td>P12 Blk 3</td> <td>Tai Tak Plantation</td> </tr> <tr> <td>5</td> <td>REM</td> <td>P16 Blk 3</td> <td>Reserve Sg Berangan</td> </tr> <tr> <td>6</td> <td>REM</td> <td>P19 Blk 5</td> <td>Basir Ismail Estate</td> </tr> <tr> <td>7</td> <td>Sg Papan</td> <td>P08 Blk 1</td> <td>Kg Muhibbah</td> </tr> <tr> <td>8</td> <td>Sg Papan</td> <td>P08 Blk 2</td> <td>FELDA Adela</td> </tr> </tbody> </table>					Estate	Boundary	Neighbouring Unit	1	Sindora	P14 Blk 1	FGV Bukit Tongkat	2	Sindora	P16A Blk 4	Tanah KEJORA	3	Sindora	P06 Blk 1	TH Bkt Lawiang	4	REM	P12 Blk 3	Tai Tak Plantation	5	REM	P16 Blk 3	Reserve Sg Berangan	6	REM	P19 Blk 5	Basir Ismail Estate	7	Sg Papan	P08 Blk 1	Kg Muhibbah	8	Sg Papan	P08 Blk 2	FELDA Adela	Complied
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		9	Sg Papan	P04 Blk 4	Kg Muhibbah	
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.						
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>A list of contracted parties is maintained accordingly. E.g. for Sindora POM, sampled the List of Contractors for FFB suppliers e.g. Perniagaan Sri Misan, Nilai Megah Sdn Bhd, Perniagaan Md Sangidi, Eng Lee Heng Trading Sdn Bhd and Choon Guan Oil Palm Sdn Bhd. Similarly, estates have maintained list of contracted parties adequately and up to date. At REM estate sampled contractor SOKO SK Enterprise for Harvesting FFB from field P15 scope of work. As for Sungai Papan Estate sampled Sri CK Enterprise for Harvesting FFB at field P11, P12 and P13.</p>				Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>Records of the origins of all third-party sourced FFB were verified. Summary of FFB received based on weighbridge record as at to date checked. Contracts e.g. Purchase of FFB Agreement contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. E.g. verified Purchase of FFB Agreement between Perniagaan Sri Misan and Sindora Berhad dated 31/12/2019 with contract valid until 31/12/2020. As for estates, sampled at REM Estate on Memorandum of Agreement between Kulim (Malaysia) Bhd and SOKO SK Enterprise for Harvesting FFB from field P15 scope of work. The contract valid until 31/10/2021 and contain specific clauses on meeting applicable legal requirements. Whereas at Sungai Papan Estate, sampled Memorandum of Agreement between Mahamurni Plantations Sdn Bhd and Sri CK Enterprise for Harvesting FFB at field P11, P12 and P13. The contract valid until 31/10/2021 and contain specific clauses on meeting applicable legal requirements.</p>				Non-compliance

Sungai Papan Estate:

- a) Sampled the payslips for contractor's workers found that they worked on paid public holiday without paid twice the ordinary rate per piece as verified through the Workers Attendance Card by the contractor as below:

I/C No.:	Work on Public Holiday
690316-01-52XX	21/08/2020
731122-01-50XX	31/08/2020
631110-71-58XX	16/09/2020
990417-01-79XX	24/09/2020
940610-01-50XX	
750428-01-73XX	

- b) Besides, there was only 1 day paid holiday paid to the workers above for August 2020 and September 2020 whereas there were 2 days of paid holiday on the respective months.
- c) PPE compliance among the outsourced FFB harvesting contractor workers at P12/B2 was not adequately complied. During the outsourced FFB harvesting field activity visit at P12/B2, noticed 2 harvesting workers wearing short pants and 4 harvesting workers not wearing safety rubber boots during at work. Thus, a Minor NC been raised.

Thus, a minor non-conformance was raised.

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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>Verified that all contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour & it has been included as an attachment Addendum in the agreement contract with the FFB suppliers. E.g. verified Purchase of FFB Agreement between Perniagaan Sri Misan and Sindora Berhad dated 31/12/2019 with contract valid until 31/12/19.</p> <p>As for estates sampled at REM Estate verified Memorandum of Agreement between Kulim (Malaysia) Bhd and SOKO SK Enterprise for Harvesting FFB from field P15 scope of work. The contract valid until 31/10/2021. The contract has included an addendum to the existing LOA Ref. No. KMB/C1/56/111 (2020) dated 06/10/2020 contains clauses disallowing child, forced and trafficked labour. The addendum also includes a protection statement on any eligible young labour will be employed only in accordance with Children and Young Person (Employment) Act 1966.</p> <p>Whereas at Sungai Papan Estate verified the Memorandum of Agreement between Mahamurni Plantations Sdn Bhd and Sri CK Enterprise for Harvesting FFB at field P11, P12 and P13. Seen the Request of Extension of Contract Period – Variation Order dated 30/05/2019, Verified the Contract No. MPSB/LSPN 07/2016 extended until 31/05/21. The contract has included an addendum to the existing LOA Ref. No. KMB/C1/56/111 (2020) dated 06/10/2020 contains clauses disallowing child, forced and trafficked labour. An addendum also been included in the contract to include a protection statement on any eligible young labour will be employed only in accordance with Children and Young Person (Employment) Act 1966.</p>	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	(C) For all directly sourced FFB, the mill requires:	Sindora POM processed own estate crops and FFB sourced from third party trader suppliers. The mill ensures all FFB supplies from	Complied

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	<ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>all directly sourced FFB by obtaining the valid MPOB license from the FFB suppliers as stipulated in the Marketing Guideline Procedure Fresh Fruit Bunch (FFB) Supply, Doc. No. KMB/MKTG/MGP-03, Rev. 0, Date: 01/09/2020. Sampled following MPOB license for the FFB directly sourced suppliers:</p> <p>a) Sindora Berhad (Reg. No. 13418-K) – Ladang Sindora Selatan, MPOB license No. 501863602000 valid until 30/11/2020</p> <p>b) Kulim (Malaysia) Berhad (Reg. No. 501259002000) – Ladang R.E.M, MPOB license No. 501259002000 valid until 31/03/2021</p> <p>c) Mahamurni Plantations Sdn Bhd (Reg. No. 38290-V) – Sungai Papan, MPOB license No. 570243002000 valid until 28/02/2021</p>	
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>Sindora POM processed own estate cops and FFB sourced from third party trader suppliers. The mill ensures all FFB supplies from outside the unit of certification are from legal sources. Method to ensure this compliance is by obtaining the valid MPOB license from the FFB trader suppliers as stipulated in the Marketing Guideline Procedure Fresh Fruit Bunch (FFB) Supply, Doc. No. KMB/MKTG/MGP-03, Rev. 0, Date: 1/09/2020. Sampled following MPOB license for the FFB trader suppliers:</p> <p>a) Perniagaan Sri Misan (Reg. No. JM0502197-A), MPOB license No. 537918015000 valid until 31/03/2021.</p> <p>b) Eng Lee Heng Trading Sdn Bhd (Reg. No. 790072-D), MPOB license No. 538454015000 valid until 31/3/2021.</p> <p>c) Perniagaan MD. Sangidi (Reg. No. JM 0356901-V), MPOB license No. 5064620150000 valid until 31/03/2021.</p>	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.

<p>3.1.1</p>	<p>(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 -</p>	<p>The 3 estates, i.e Sindora, REM, Sg Papan continued to commit to long term economic and financial viability. The annual budgets for 2021 to 2025 were sighted. The budget covers activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO/MSPO compliance etc. The budget also included projections on yield/ha, and total cost of production per m ton & per ha and CAPEX - capital expenditure mainly for buildings, furniture and others asset related expenses. The estates possessed the following format for the annual budget.</p> <table border="1" data-bbox="1189 687 1832 1118"> <thead> <tr> <th>Year</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Mature Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Immature Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Total Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>FFB Tons</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Yld/Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>RM/mt FFB</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>RM/ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> </tbody> </table> <p>Similarly the mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning. The business plan among others contains;</p> <ul style="list-style-type: none"> a) FFB yield & CPO production forecast b) Extraction Ratios – OER / KER c) Cost of production - administration / labour overhead 	Year	2021	2022	2023	2024	2025	Mature Ha	x	x	x	x	x	Immature Ha	x	x	x	x	x	Total Ha	x	x	x	x	x	FFB Tons	x	x	x	x	x	Yld/Ha	x	x	x	x	x	RM/mt FFB	x	x	x	x	x	RM/ha	x	x	x	x	x	<p>Complied</p>
Year	2021	2022	2023	2024	2025																																														
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		<p>- processing cost labour, maintenance, consumables - depreciation and head office charges d) EVIT running accounts e) CAPEX - capital expenditure.</p> <table border="1" data-bbox="1182 549 1883 1093"> <thead> <tr> <th>Year</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>FFB processed</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>OER</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>KER</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Administration</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Processing cost</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Maintenance</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Depreciation</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>H Q charges</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>RM/mt FFB</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>RM/mt CPO</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> </tbody> </table>	Year	2021	2022	2023	2024	2025	FFB processed	x	x	x	x	x	OER	x	x	x	x	x	KER	x	x	x	x	x	Administration	x	x	x	x	x	Processing cost	x	x	x	x	x	Maintenance	x	x	x	x	x	Depreciation	x	x	x	x	x	H Q charges	x	x	x	x	x	RM/mt FFB	x	x	x	x	x	RM/mt CPO	x	x	x	x	x	
Year	2021	2022	2023	2024	2025																																																																
FFB processed	x	x	x	x	x																																																																
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<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -</p>	<p>The long-range replanting programs (LRRP) until 2025 were sighted on all the estates. The program was reviewed once a year and incorporated into their annual financial budget. The program sighted for the next 5 years in hectares was as follows:</p> <table border="1" data-bbox="1182 1273 1765 1367"> <thead> <tr> <th></th> <th>Year</th> <th>Sindora</th> <th>REM</th> <th>Sg Papan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2021</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table>		Year	Sindora	REM	Sg Papan	1	2021	0	0	0	<p>Complied</p>																																																								
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			2	2022	0	0	0																
			3	2023	0	0	0																
			4	2024	0	106.91	0																
			5	2025	0	0	0																
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>The management review was held as follows chaired by the respective Managers:</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Date of meeting</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Sindora</td> <td>23/09/2020</td> <td>19</td> </tr> <tr> <td>2</td> <td>REM</td> <td>08/10/2020</td> <td>11</td> </tr> <tr> <td>3</td> <td>Sg Papan</td> <td>01/10/2020</td> <td>17</td> </tr> <tr> <td>4</td> <td>Sindora POM</td> <td>05/10/2020</td> <td>14</td> </tr> </tbody> </table> <p>The agenda discussed among others includes the following;</p> <ul style="list-style-type: none"> a) Results of internal external audits b) Customer feedback c) Process performance and product conformity d) Status of preventive & corrective actions e) Follow up action from management review f) Changes that could affect the management system g) Continual improvement plan <p>Minutes of meeting for all the units were sighted and verified. No major issues were highlighted during the meeting. There were change in the Executive Director Post in Sept 2020. Main focus is</p>		Estate	Date of meeting	Attendees	1	Sindora	23/09/2020	19	2	REM	08/10/2020	11	3	Sg Papan	01/10/2020	17	4	Sindora POM	05/10/2020	14	Complied
	Estate	Date of meeting	Attendees																				
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4	Sindora POM	05/10/2020	14																				

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		on the forthcoming external RSPO audit in Oct 2020. There were changes in the top management in KMB in Sept 2020.	
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	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Sindora POM: The Mill has established continual improvement plan documented and monitored. Data monitoring on yearly basis. Sighted the sampled implementation of the improvement plan FY 2020 as follows: a) Target: To control boiler smoke emission by comply with DOE Requirement by end 2007. Black smoke emission < Ringlemann chart No.2 Action Plan: To ensure operation consistent running 3 press with throughput>38-40mt. b) Target: To control diesel consumption from 0.60liter/mt FFB process. Action Plan: To running Turbine for non-processing hours use excess fibre. At Sindora Estate, REM Estate & Sungai Papan Estate - Continuous Improvement Plan for year 2020 implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. Zero burn replanting, Empty Fertiliser Bags Utilization, Triple Rinsed Plastic Containers Dispatched to Certified Waste Managers, Reduction of Chemical Usage, Integrated Pest Management E.g. Barn Owl for Rat Control and planting of beneficial plant i.e. Cassia cobanensis, Antigonon leptopus and Turnera subulate.</p>	Complied

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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 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>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. Annual Communication of Progress is available publicly.</p>	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>There was a standard SOP prepared for the Sindora Complex. SOPs remain with no further changes with latest dated 01/08/2018 for mill. SOP covered all aspects of Mill Operation e.g. Weighbridge Station, Loading Ramp Station, Steriliser Station, Threshing Station, Clarification Station, Kernel Station, Boiler Station and Power House.</p> <p>As for estates, the estate operation SOPs has been established and in place accordingly. Sampled Sindora estate SOPs which includes Weed & Pest Usage and Application Control, Fertilizer Usage & Application Control, Manual Manuring, Harvesting and Schedule Waste Management. The Sindora Estate SOPs been approved by Senior Manager – Mr. Megat Zaidi dated 01/04/2018.</p> <p>At the REM Estate & Sungai Papan Estate, the SOPs has been also been established and in place accordingly. Kulim (Malaysia) Berhad Agricultural Manual (Updated on 1 July 2013) and Safe Operating Procedure (Updated on 18 May 2009) was available for verification</p>	Complied

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		accordingly. The SOP copies were available in the Mill office and estates.	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	<p>Mechanism to check consistent implementation of procedures is through internal audit by HQ Sustainability team. Internal audit was conducted on 08/09/2020 at Sindora POM and Sindora Estate. At REM Estate the internal audit was conducted on 09/09/2020. Whereas</p> <p>At Sungai Papan Estate, the internal audit was conducted on 13/09/2020. Non-compliances recorded with regards to P&C indicators have been closed effectively. The mechanism of checking the consistent implementation was mainly carried out through field supervision by field staff, executive and managers.</p> <p>Sindora Estate: 1 unit of first aid kit containing first aid materials including expired oral medications and expired eye wash solution was found kept alongside with 1 unit of latest inspected & valid content first aid kit in the school bus.</p> <p><i>Thus, a minor non-conformance was raised.</i></p>	Non-compliance
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	<p>Records of monitoring with regards to RSPO implementation are maintained and available for verification. Sample of records as follows:</p> <p>Sindora POM & Sindora Estate: HQ Sustainability team Internal Audit Report available dated 08/09/2020.</p> <p>REM Estate: HQ Sustainability team Internal Audit Report dated 09/09/2020. REM Estate is in process of reviewing its Safe Operating Procedure (last updated on 18 May 2009). This has been decided during the Safety & Health Committee Meeting dated 11/06/2020. Timeline for completion standard operating procedure</p>	Complied

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		<p>and circulation to all operating unit is by December 2020. This will be further verified during the next assessment visit.</p> <p>Sungai Papan Estate: HQ Sustainability team Internal Audit Report available dated 13/09/2020.</p>	
<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>			
<p>3.4.1</p>	<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>Sustainability & Quality Department has carried out Social Impact Assessment on 08/09/2020 in Sindora POM, 08/09/2020 in Sindora Estate, 09/09/2020 in REM Estate and 09/09/2020 in Sungai Papan Estate during internal audit. The assessment has involved participation of contractors and internal workers. Checklist Interview was utilized during interview with the contractor for SIA. The social impact register is developed based on the scoring of frequency, consequence and likelihood. Social Management Plan will be developed after the social impact register established.</p> <p>There were no new planting in the 3 estates. This is verified through the following document/facts</p> <ul style="list-style-type: none"> a) Hectare statement compared to the previous year. b) Interviews with the management c) Field visits and verification. <p>The assessment of both the above was made in Social/Environmental Management Plan 2020/21 among others meant;</p> <ul style="list-style-type: none"> a) To assess current condition based on identified potential aspects b) To verify presence of protected & conservation areas that could be significantly affected. 	<p>Complied</p>

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		<p>c) To assess the social & environmental impact on the affected areas/stakeholders arising from the estate/mill activities. d) To comply with various sustainability certification schemes</p> <p>The activities involved discussion with the estate management, sighting the documentation, observation on sites and surrounding, and interview with stakeholders adjacent to the conversion areas. The assessment covered the aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control. Interviews were conducted with stakeholders to obtain feedback on the impact of replanting activities on their daily lives.</p> <p>The Social Management Plan for period 2020-2021 produced among includes the following; a) Organization information b) Scope of assessment & team c) Methodology assessment timeline, approach and parameters d) SEAI matrix and findings.</p> <p>All sites and the reports were visited and sighted respectively by the auditors in presence of the SQD, estates and mill personnel.</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. - Minor Compliance -</p>	<p>The social management plan was developed after the conducted the assessment with the selected stakeholders during internal audit. Seen the attendance list of stakeholders involved such as contractors, workers and schools' representatives.</p>	Complied

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3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The last review of the social management plan was on 08/09/2020 in Sindora POM, 08/09/2020 in Sindora Estate, 09/09/2020 in REM Estate and 09/09/2020 in Sungai Papan Estate with identification of negative and positive impacts. Mitigation and promotion actions were taken accordingly to the impacts identified. For eg: Risk of pandemic outbreak is high due to the Sindora Estate is near to the town. The management has implemented and practiced SOP such as face mask and monitor the body temperature on daily basis. Records of visitors were maintained as well.</p> <p>The Social/Environmental Action Plan 2020/21 available for each units were available having information i.e issues, management plan, PIC and time frame. The input are gathered from the meeting minutes</p> <ul style="list-style-type: none"> a) Gender Committee, NUPW, b) Safety Meeting, c) Complaint & Request from internal & external stakeholders d) Management meeting at estates/mill and regional level. e) Dialogue during the morning muster. 	Complied
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>KULIM (M) Berhad has developed procedures for Recruitment of Local Workers for Operating Units last updated on 01/10/2020 and Recruitment of New Foreign Workers last updated on 01/01/2019, Rev. No.: 1. Recruitment, selection, hiring, promotion, retirement and termination has been outlined in the procedure.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Sindora POM, Sindora Estate and Sungai Papan Estate has published advertisement of job vacancy and displayed in the food stalls in nearby town and circulated the job vacancy in the social media to the internal staffs and workers. Sungai Papan Estate has</p>	Complied

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		<p>made a public interview session in neighbouring Felda community to recruit the local communities. Besides, KULIM has published job vacancy in Facebook page of KULIM as verified through interviewed with the recently joined staff in Sindora Estate. Sindora POM and Sindora Estate has recruited local workers recently and seen the records of recruitment such as application form, identification card, medical examination records and offer letter.</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>Sindora Complex has identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. For Sindora mill sampled the HIRARC activity for Weighbridge, Grading, Ramp, Laboratory, Threshing, Kernel, Boiler, EFB Press and Steriliser. HIRARC for the mill operation was reviewed at least on annual basis, or whenever there is a change in activity/process or incidents. Latest mill HIRARC review was done accordingly on 07/06/2020 for the incident at Sludge Pit.</p> <p>At the estate, among the HIRARC carried out covered sampled activities like FFB Loading (Manual & Mechanical), Harvesting, Spraying, Rat Baiting, Rubbish Collection, Chemical Handling, Welding Work and Grinding Work.</p> <p>At Sindora Estate, the HIRARC is reviewed at least on annual basis, or whenever there is a change in activity/process or incidents. Latest Sindora Estate HIRARC review was done accordingly on 01/08/2020 for the FFB Loading (Manual & Mechanical). As for REM Estate, an overall HIRARC review for all activities was done on 30/04/2020. Whereas at Sungai Papan Estate, similarly an overall HIRARC review for all activities was done on 15/08/2020.</p>	<p>Complied</p>

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<p>3.6.2</p>	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>Kulim (Malaysia) Berhad has maintained an approved Health and Safety Policy dated 01/05/2018 that is displayed prominently on notice boards in English/Bahasa Malaysia. Safety & Health Management Plan was available accordingly for year 2020.</p> <p>Sindora POM: CHRA was conducted by DOSH registered assessor Reg. No. JKPP HQ/03/ASS/00/154, Date of Assessment: 26/03/2018-13/08/2018. Recommendation action plan has been executed accordingly.</p> <p>Seen the Local Exhaust Ventilation (LEV) conducted on 10/06/2019 by DOSH registered assessor Reg. No. JKPP HQ/17/JH11/00/004. Result of inspection concluded complied with ACGIH & USECHH Regulation 2000 requirements and the air borne contaminants were effectively removed from the work area/production into the outside atmosphere.</p> <p>Local Exhaust Ventilation (LEV) and Noise Risk Assessment (NRA) for year 2020 has been rescheduled to be conducted on 08/10/2020 & 25/10/2020 respectively due to the COVID-19 pandemic which has triggered movement control order and impacted on the scheduling process. The mill is aware of the rescheduling and closely monitoring on its completion status. This will be further verified during the next assessment visit.</p> <p>Health Surveillance Program: Sindora POM Annual Medical Surveillance has been conducted accordingly on 03/10/2020 for all workers exposed to related chemicals as per CHRA recommendation. The Medical Surveillance conducted for 28 workers by DOSH Reg. OHD No. HQ/11/DOC/00/235. Results indicates all 28 workers were fit to work.</p> <p>Sindora Estate:</p>	<p>Complied</p>
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		<p>CHRA was conducted by DOSH registered assessors Reg. No. JKPP HQ/03/ASS/00/154 & HQ/12/ASS/00/309, Date of Assessment: 26/03/2018-13/08/2018. Recommendation action plan has been executed accordingly.</p> <p>Health Surveillance Program:</p> <p>Sindora Estate Annual Medical Surveillance has been conducted accordingly on 03/10/2020 for all workers exposed to related chemicals as per CHRA recommendation. The Medical Surveillance conducted for 20 workers by DOSH Reg. OHD No. HQ/11/DOC/00/235. Results indicates all 20 workers were fit and 4 workers were unfit to work. The 4 unfit workers has been reassigned to other job and pending further follow up medical check-up. No pregnant/nursing workers were involved in pesticide handling works.</p> <p>Noise Risk Assessment:</p> <p>Noise Risk Assessment (NRA) for year 2020 has been rescheduled to be conducted on December 2020 due to the COVID-19 pandemic which has triggered movement control order and impacted on the scheduling process. The estate is aware of the rescheduling and closely monitoring on its completion status latest by December 2020. This will be further verified during the next assessment visit.</p> <p>REM Estate:</p> <p>CHRA was conducted by DOSH registered assessors Reg. No. JKPP HQ/03/ASS/00/154 & HQ/12/ASS/00/309, Date of Assessment: 26/02/2018-13/08/2018. Recommendation action plan has been executed accordingly.</p> <p>Health Surveillance Program:</p> <p>REM Estate Annual Medical Surveillance has been conducted from August 2020 until September 2020 for all workers exposed to</p>	
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		<p>related chemicals as per CHRA recommendation. Seen the Medical Surveillance report dated 16/10/2020 conducted for 60 workers by DOSH Reg. OHD No. HQ/11/DOC/00/235. Results indicates all 59 workers were fit and 1 worker were unfit to work. The 1 unfit worker has been reassigned to other job and pending further follow up medical check-up. JKPP 7 & USECHH 5i has been submitted accordingly. No pregnant/nursing workers were involved in pesticide handling works.</p> <p>Noise Risk Assessment:</p> <p>Noise Risk Assessment (NRA) for year 2020 has been rescheduled to be conducted on December 2020 due to the COVID-19 pandemic which has triggered movement control order and impacted on the scheduling process. The estate is aware of the rescheduling and closely monitoring on its completion status. This will be further verified during the next assessment visit.</p> <p>Sungai Papan Estate:</p> <p>CHRA was conducted by DOSH registered assessors Reg. No. JKPP HQ/03/ASS/00/154 & HQ/12/ASS/00/309, Date of Assessment: 27/02/2018-13/08/2018. Recommendation action plan has been executed accordingly.</p> <p>Health Surveillance Program:</p> <p>Sungai Papan Estate Annual Medical Surveillance has been conducted on 18/10/2020 for all workers exposed to related chemicals as per CHRA recommendation. The official report is still pending from the DOSH Reg. OHD No. HQ/11/DOC/00/235. The estate is closely following up on the matter and further verification will done during the next assessment visit. Verified that no pregnant/nursing workers were involved in pesticide handling works.</p> <p>Noise Risk Assessment:</p>	
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		Noise Risk Assessment (NRA) for year 2020 has been rescheduled to be conducted on December 2020 due to the COVID-19 pandemic which has triggered movement control order and impacted on the scheduling process. The estate is aware of the rescheduling and closely monitoring on its completion status. This will be further verified during the next assessment visit.	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
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>	Sindora POM, Sindora Estate, REM Estate & Sungai Papan Estate has established an annual training program with latest training program for year 2020 that covers all aspects of the RSPO Principles and Criteria. The training need and program was made available for verification at all visited sites. Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained e.g. in understanding of RSPO, chemical handling, safe working practices and the correct use of PPE.	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Training records for employees available and maintained at the office. Records are verified on a sampling basis which covers all aspect of training and RSPO P&C requirement as follows:</p> <p>Sindora POM:</p> <ul style="list-style-type: none"> a) Schedule Waste Training dated 10/08/2020 b) Water Treatment & Chemical Handling dated 17/09/2020 c) Confined Space Training dated 06/07/2020 d) Steriliser Station Training dated 04/06/2020 e) Press Station Training dated 18/05/2020 f) Oil Room Station Training dated 14/05/2020 g) First Aid Training dated 02/09/2020 	Complied

		<p>h) LOTO Training dated 02/02/2020</p> <p>Sindora Estate:</p> <p>a) Working at Height dated 18/10/2020</p> <p>b) Tractor Driver Training dated 15/10/2020</p> <p>c) Fire Drill Training dated 18/10/2020</p> <p>d) Chemical Handling Training dated 27/09/2020</p> <p>e) Chemical/Fertilizer Training dated 07/9/2020</p> <p>f) First Aid Training dated 02/09/2020</p> <p>REM Estate:</p> <p>a) Water Sampling Training dated 25/08/2020</p> <p>b) Rubbish Collection Training dated 20/08/2020</p> <p>c) Harvesting Training dated 13/08/2020</p> <p>d) COVID-19 Awareness Training dated 11/06/2020</p> <p>e) Pesticide Spraying Training dated 11/03/2020</p> <p>f) Manuring Training dated 13/02/2020</p> <p>g) Rat Baiting Training dated 03/02/2020</p> <p>h) Fire Drill/ERP Training dated 11/10/2020</p> <p>i) First Aid Training dated 14/10/2020</p> <p>j) Tractor Driving Training dated 07/10/20 20</p> <p>k) Buffer Zone Training dated 15/09/2020</p> <p>Sungai Papan Estate:</p> <p>a) Spraying Technique and PPE Refresher Training dated 12/10/2020</p>	
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		b) First Aid Training dated 08/07/2020 c) RSPO Training to Weighbridge Operator dated 17/08/2020 d) Buffer Zone Training dated 25/08/2020 e) Diesel Handling Training dated 18/08/2020 f) Harvesting (Contract) Training dated 22/06/2020 g) COVID-19 Awareness Training dated 19/03/2020 i) Rat Baiting Training dated 11/03/2020 k) Manuring Training dated 04/03/2020 l) Fire Drill Training dated 22/01/2020	
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 -	Relevant personnel to supply chain implementation as defined by the Sindora Complex are the personnel that involve in supply chain implementation such as Weigh Bridge Supervisor, Weigh Bridge Operator, Process Supervisor, Lab Conductor, Lab Operator and Process Supervisor. The latest SCCS training was conducted on 20/09/2020.	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. 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	N/A. Sindora POM is using the Mass Balance supply chain model since it receives the FFB from own supply bases and outside FFB suppliers.	Complied

	without physically separating them, then only Mass Balance Module is applicable.		
3.8.2	<p>Mass Balance Module</p> <p>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>Sindora POM is using the Mass Balance supply chain model since it receives the FFB from own supply bases and outside FFB trade suppliers.</p>	Complied
3.8.3	<p>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.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The registration of PalmTrace will be carried out by the Marketing Department. All transaction will be registered in the PalmTrace. The mill registered license available in PalmTrace as following:</p> <ul style="list-style-type: none"> - Member ID: RSPO_PO1000001264 - Member category: Oil Mill - RSPO Membership No.: 1-0080-09-000-00 - License Status: Expires on 22/01/2021 	Complied
3.8.5	<p>Documented procedures</p> <p>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:</p>	<p>The SOP Sustainable Management System, Traceability, Doc. No: SQD/SMS/1.2, rev:5 dated 1 August 2020. On the marketing side, guidance document, RSPO Supply Chain, MKD/001, rev:01 dated 09/10/2018 is referred to.</p>	Complied

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	<ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the 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>The RSPO SCC training & traceability has been conducted on 20/09/2020 at Sindora POM attended by person in charge from various position such as assistant manager, weighbridge operators, general clerk etc.</p> <p>The person having overall responsibility for and authority over the implementation is Head of each operating unit for RSPO P&C, MSPO, RSPO SCC and ISCC Certification Program, as per appointment letter SQD/ADMIN/017/19, dated 22/09/2019.</p>	
<p>3.8.6</p>	<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 review at least annually. The mill shall maintain the internal audit records and reports. 	<p>The Sustainable Management System, Internal Audit Doc. No: SQD/SMS/3.2 Date 1 August 2020 as the Internal Audit Procedure where the SCC audit shall be conducted as per Internal Audit Process which covers internal audit schedule (plan), audit report, non-conformance report, correction and corrective action, review and closing the NCR.</p> <p>As per SOP, the management has conducted the Internal Audit at least once within 12 months (before the expiry of the certificate). Internal audit Non-conformance Report and Internal Audit checklist dated 8 September 2020 sighted for Sindora POM and available during the audit. Verified that no NC raised with regards to RSPO supply chain elements.</p>	<p>Complied</p>
<p>3.8.7</p>	<p>Purchasing and Goods In</p>	<p>The mill is received FFB from own certified supplying estates, other certified estates from own company, smallholders that certified under Group Certification of RSPO and other dealers.</p>	<p>Complied</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>All the tonnage of incoming of FFB will be recorded in DOMAIN system on daily basis by Weighbridge Operator.</p> <p>KULIM (M) Berhad has developed Traceability Procedure (Doc. No.: SQD/SMS/1.2 dated 01/08/2020, Rev. No.: 05) where mechanism for handling of non-conformity or potential non-conformity of products was outlined in the procedure.</p>	
<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> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>Sindora POM and Marketing Department has ensured the required information is available in document form. Sampled of contracts as below:</p> <p>CSPO</p> <p>Contract No.: CPOMB-M1918 – 500 MT</p> <ul style="list-style-type: none"> • The name and address of the buyer: XXXXXX • The name and address of the seller: Mahamurni Plantations Sdn Bhd, 705, 80990 Johor Bahru • The loading or shipment/ delivery date: 05/12/2019 • The date on which the documents were issued: 05/12/2019 • RSPO certificate number: RSPO612392 • A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Crude Palm Oil – RSPO MB • The quantity of the products delivered: 40.68 MT • Any related transport documentation: W/B Ticket# C02590 <p>A unique identification number: Contract No.: CPOMB-M1918</p> <p>Contract No.: CPOMB-M1927 – 500 MT</p> <ul style="list-style-type: none"> • The name and address of the buyer: XXXXXX 	<p>Complied</p>

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		<ul style="list-style-type: none"> • The name and address of the seller: Mahamurni Plantations Sdn Bhd, 705, 80990 Johor Bahru • The loading or shipment/ delivery date: 27/04/2020 • The date on which the documents were issued: 27/04/2020 • RSPO certificate number: RSPO 612392 • A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Crude Palm Oil – RSPO MB • The quantity of the products delivered: 39.69 MT • Any related transport documentation: W/B Ticket# C03095 • A unique identification number: Contract No.: CPOMB-M1927 <p>CSPK</p> <p>Contract No.: MPOK 2028 MB – 1,000 MT</p> <ul style="list-style-type: none"> • The name and address of the buyer: XXXXXX • The name and address of the seller: Mahamurni Plantations Sdn Bhd, 705, 80990 Johor Bahru • The loading or shipment/ delivery date: 24/07/2020 • The date on which the documents were issued: 24/07/2020 • RSPO certificate number: RSPO 612392 • A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Palm Kernel – RSPO MB • The quantity of the products delivered: 36.40 MT • Any related transport documentation: W/B Ticket# K00867 • A unique identification number: Contract No.: MPOK 2028 MB <p>Contract No.: MPOK 2042 MB – 700 MT</p> <ul style="list-style-type: none"> • The name and address of the buyer: YYYYYYYY • The name and address of the seller Mahamurni Plantations Sdn Bhd, 705, 80990 Johor Bahru • The loading or shipment/ delivery date: 25/09/2020 	
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		<ul style="list-style-type: none"> • The date on which the documents were issued: 25/09/2020 • RSPO certificate number: RSPO 612392 • A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Palm Kernel – RSPO MB • The quantity of the products delivered: 35.69 MT • Any related transport documentation: W/B Ticket# K00936 • A unique identification number: Contract No.: MPOK 2042 MB 	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective</p>	<p>Sindora POM has use the service of transporter to transport CPO to buyer’s site. Sampled below contractor:</p> <p>a) Pengangkutan Olimpik for Transport of CPO from Mahamurni Plantations Sdn Bhd Group Mills to Various Refineries. Contract no: MPSB/CPO 1/2016(SELAMA), dated 15/06/2020.</p> <p>b) Semai Setia Transport for Transport of CPO from Mahamurni Plantations Sdn Bhd Group Mills to Various Refineries. Contract no: MPSB/CPO 1/2016(SS), dated 15/06/2020.</p> <p>c) Yewtan Enterprise Sdn Bhd for Transport of CPO from Mahamurni Plantations Sdn Bhd Group Mills to Various Refineries. Contract no: MPSB/CPO 1/2016(YEWTAN) dated 15/06/2020.</p> <p>However, outsourced activities are not included in the RSPO supply chain certificate scope.</p>	Complied

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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 mill ensures that outsourced activities (transportation) is not contaminated with non-certified materials as per the transportation contract agreement. Verified that there is no outsourced processes used for the physical handling of RSPO certified oil palm products within Sindora Palm Oil Mill, hence this requirement is not applicable.	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.	Not applicable. The mill outsourced transportation of CPO activity to buyer location, but the transporter does not involve in physical handling of RSPO certified oil palm products.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> 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>The retention period for traceability records are 5 years as per the procedure of Control of Record (Doc. No.: SQD/SMS/3.4 dated 20/09/2019, Rev. No.: 0).</p> <p>Verified the records such as internal audit report, mass balance sheets, training records and management review meeting minutes are accurate, complete, up-to-date and accessible.</p> <p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non-certified FFB. Computerized system, DOMAIN in place to maintain the records.</p> <p>Mass balance sheet named Sustainable Products Daily and Monthly Movement Summary Report for 2019 and 2020 are reviewed. All the certified CPO and PK products sold were deducted from the accounting system. No sell short detected in Sindora POM.</p>	Complied

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	<p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>		
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	Conversion factor of CPO and PK production is depending on the actual OER and 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	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	Not applicable as Sindora POM is opted for Mass Balance module.	Complied
3.8.16	<p>Registration of Transactions</p> <p>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.</p>	<p>Sampled the shipping announcement as below:</p> <p>a) Transaction ID: TR-6490b378-3be5, last delivery on 10/12/2019, created on 10/02/2020 and confirmed on 10/02/2020 for 181.7 MT of CSPO</p> <p>b) Transaction ID: TR-1f2a2794-370c, last delivery on 27/04/2020, created on 12/05/2020 and confirmed on 13/05/2020 for 69.83 MT of CSPO</p>	Complied

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	ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	<p>c) Transaction ID: TR-d1cd0d1d-19eb, last delivery on 24/07/2020, created on 08/08/2020 and confirmed on 25/08/2020 for 354.32 MT of CSPK</p> <p>d) Transaction ID: TR-96255a9e-e33b, last delivery on 25/09/2020, created on 13/10/2020 and confirmed on 13/10/2020 for 225.48 MT of CSPK</p> <p>All the announcements were made within 3 months.</p>	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. Refer to RSPO trademark and license registered under Kulim (M) Berhad (parent company: Johor Corporation) 1-0080-09-100-00 for supply chain model (IP and MB) valid until 22/08/2021.</p>	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	<p>The following was communicated in the group website – http://www.kulim.com.my/business-type.aspx?p_Id=23&c_Id=45&c=PLANTATION</p> <p>Kulim (M) Berhad is a subsidiary of the Johor Corporation and was amongst the earliest palm oil producers to be certified to the Roundtable on Sustainable Palm Oil ("RSPO") standard</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ol style="list-style-type: none"> Display its RSPO membership status Display the RSPO web address (www.rspo.org) State that the member supports the work of the RSPO State the member's history with regard to the RSPO. Use the RSPO trademark to promote its membership of the RSPO. 	<p>The communication in http://www.kulim.com.my/business-type.aspx?p_Id=23&c_Id=45&c=PLANTATION states that Kulim (M) Berhad is RSPO certified.</p>	Complied

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	Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org ' where the link must lead to the member's profile page.		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	The communication in http://www.kulim.com.my/business-type.aspx?p_Id=23&c_Id=45&c=PLANTATION states that Kulim (M) Berhad is RSPO certified.	Complied
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.	The communication in http://www.kulim.com.my/business-type.aspx?p_Id=23&c_Id=45&c=PLANTATION states that Kulim (M) Berhad is RSPO certified.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No logo used has been observed in the website, official documents etc.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e product/commodity with SCC model (CSPK MASS BALANCE) and RSPO certificate number; RSPO 612392. Refer to despatch ticket no.: K00892 dated 21/8/20. This also applies to CPO	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate	Sindora POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable

	<p>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.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	No business to consumer communication on product specific claim made by Sindora POM and only producing crude and unfinished product. This is not applicable for POM.	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.	No business to consumer communication on product specific claim made by Sindora POM and only producing crude and unfinished product. This is not applicable for POM.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made by Sindora POM and only producing crude and unfinished product. This is not applicable for POM.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made by Sindora POM and only producing crude and unfinished product. This is not applicable for POM.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made by Sindora POM and only producing crude and unfinished product. This is not applicable for POM.	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.	No business to consumer communication on product specific claim made by Sindora POM and only producing crude and unfinished product. This is not applicable for POM.	Not Applicable

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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.	No business to consumer communication on product specific claim made by Sindora POM and only producing crude and unfinished product. This is not applicable for POM.	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 applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org .	No business to consumer communication on product specific claim made by Sindora POM and only producing crude and unfinished product. This is not applicable for POM.	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	N/A. Sindora POM is producing crude palm product and does not involved in any labelling of end-product.	Not Applicable
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	N/A. Sindora POM is producing crude palm product and does not involved in any labelling of end-product.	Not Applicable

Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> Surrounded by the text: 'Certified sustainable palm oil'. The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	<p>N/A. Sindora POM is producing crude palm product and does not involved in any labelling of end-product.</p>	<p>Not Applicable</p>
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. 	<p>N/A. Sindora POM is producing crude palm product and does not involved in any labelling of end-product.</p>	<p>Not Applicable</p>

	<ul style="list-style-type: none"> 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>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>KULIM (M) Berhad has developed Sustainability Policy dated 01/10/2020 where KULIM will respect, support and protect international human rights against violence, threats, all forms of retaliation and contribute to the effective elimination of all forms of violations of human rights and fundamental freedoms of individuals and peoples which includes Environmental Human Rights Defenders, whistle-blowers, complainants and community spokesperson. Briefing of the draft policy was conducted on 07/09/2020 in Sindora Estate, 03/09/2020 in REM Estate and 18/10/2020 in Sungai Papan Estate to the workers.</p>	<p>Complied</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>KULIM (M) Berhad ensure all personnel are treated fairly and protected from any form of discrimination that would constitute a violation of their human rights. Interviewed with the workers confirmed that no harassment by the management.</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>			

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4.2.1	<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>- Critical (Major) compliance -</p>	<p>KULIM (M) Berhad has developed Sustainability Policy dated 01/10/2020 where KULIM will respect, support and protect international human rights against violence, threats, all forms of retaliation and contribute to the effective elimination of all forms of violations of human rights and fundamental freedoms of individuals and peoples which includes Environmental Human Rights Defenders, whistle-blowers, complainants and community spokesperson.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>KULIM (M) Berhad has developed Grievance Procedure with Doc. No.: SQD/SMS/4.1 dated 01/08/2020 to ensure KULIM has a documented system for dealing with complaints and grievances that is agreeable to all sides and accepted by all stakeholders. Dispute resolution mechanisms are established through open and consensual agreements with affected parties. Procedure has outlined the process of complaint management. The timeline to resolve the grievances is clearly stated in the procedure which is within 26 days for internal employees and 21 days for other stakeholders.</p> <p>Besides, KULIM has developed Grievance Policy dated 1/05/2019 to ensure that there is a transparent process for ensuring stakeholder's grievances and complaints are dealt with fairly, consistently and promptly. Briefing of the policy was conducted on 27/08/2020 to external stakeholders during stakeholder meeting. The workers have been briefed on the policy and procedure on 06/09/2020 in Sindora POM and 03/09/2020 in REM Estate.</p>	Complied
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Sindora POM and Sindora Estate has implemented Enquiry Register book and Housing Defect Report form to record any complaints from all the stakeholders. Reviewed the Housing Defect Report form from Sindora POM found that the complainant has been informed and acknowledged after the action has been taken by the management.</p>	Complied

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		<p>Management of Sindora Estate has acted to rectify all the complaints received and verified the evidences during the audit.</p> <p>REM Estate has implemented Housing Defect Logbook to record any housing defect from workers. The workers will be acknowledged after the action has been taken to rectify the issue. Site visit to the linesite to verify the complaints found resolved and interviewed with complainant confirmed that they acknowledged after action has been taken.</p> <p>Enquiry Register Record form was implemented in Sungai Papan Estate. Sample the record as below: House No.: C7 dated 09/10/2020 Issue: Broken sink Action: Management has ordered aluminium sink and seen the invoice# IV-15409 dated 10/10/2020 and replacement of the sink was done on 13/10/2020. The complainant has acknowledged after the complaint has been resolved.</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>KULIM has developed Grievance Procedure with Doc. No.: SQD/SMS/4.1 dated 01/08/2020 where they have outlined the mechanism where consideration will be given to involve independent legal, technical advice and third parties mediator, such as disinterested community group, NGOs, or government to support the complainants and/ or act as observer to facilitate smallholder schemes and communities and others as appropriate in these communications where practicable.</p>	Complied

Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.

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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>Sindora POM, Sindora Estate, REM Estate and Sungai Papan Estate’s management has made contribution to the local communities such as donation to the events from school and mosque. Seen the petty cash vouchers for the donation made on February 2020, March 2020 and August 2020. Besides, the management of Sindora POM, Sindora Estate, REM Estate and Sungai Papan Estate has provided school bus and van to send the children to school. Interviewed with the workers confirmed that the management has made contribution to them as well such as supply fresh meats to them during festival period.</p> <p>KULIM has provided food aids to the workers who are in needs during the pandemic period. Besides, KULIM HQ has supplied school uniform to the children once a year as corporate social responsibility.</p>	Complied			
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>The estates and mill possessed evidences of legal ownership of its lands through possession of land titles. The estates have a list of all its land titles which have the information about names of lease, hectare, terms & conditions, lease period and grant numbers. Copies of the land titles were available at the estate’s offices while the original were kept at the Head Office. Evidence of legal ownership of the land including history of land tenure was verified during this audit.</p> <table border="1" data-bbox="1144 1251 1921 1295"> <tr> <td data-bbox="1144 1251 1193 1295"></td> <td data-bbox="1200 1251 1337 1295">OU</td> <td data-bbox="1344 1251 1921 1295">Historical information</td> </tr> </table>		OU	Historical information	Complied
	OU	Historical information				

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		<table border="1"> <tr> <td data-bbox="1182 363 1232 507">1</td> <td data-bbox="1232 363 1375 507">Sindora</td> <td data-bbox="1375 363 1906 507">Incorporated in 1983 and involved in oil palm and rubber and palm oil milling. A subsidiary of KMB and member of RSPO since Aug 2004.</td> </tr> <tr> <td data-bbox="1182 507 1232 683">2</td> <td data-bbox="1232 507 1375 683">REM</td> <td data-bbox="1375 507 1906 683">Established in 1937 under Eastern Tropical Product with rubber plantations. Over the years converted to oil palm cultivation known as Rubber Estate Of Malaya beginning 1968.</td> </tr> <tr> <td data-bbox="1182 683 1232 834">3</td> <td data-bbox="1232 683 1375 834">Sg Papan</td> <td data-bbox="1375 683 1906 834">Established in 1050. There were changes of ownership over the years. Mahamurni Plantations took over the management in 1982 and has maintained since.</td> </tr> <tr> <td data-bbox="1182 834 1232 986">4</td> <td data-bbox="1232 834 1375 986">Sindora POM</td> <td data-bbox="1375 834 1906 986">Built in Jan 1997 and commissioned on Sept 1998 at capacity of 30mt/hr until year 2000. in 2018 the mill capacity was upgraded to 45/hr capacity</td> </tr> </table> <p data-bbox="1137 1034 1774 1066">The land titles sighted among others as shown below:</p> <table border="1"> <thead> <tr> <th data-bbox="1171 1082 1232 1129">No</th> <th data-bbox="1232 1082 1397 1129">Estate</th> <th data-bbox="1397 1082 1585 1129">No hak milik</th> <th data-bbox="1585 1082 1742 1129">No Lot /PT</th> <th data-bbox="1742 1082 1877 1129">acres</th> </tr> </thead> <tbody> <tr> <td data-bbox="1171 1129 1232 1329">1</td> <td data-bbox="1232 1129 1397 1329" rowspan="4">Sindora</td> <td data-bbox="1397 1129 1585 1177">HSD 17659</td> <td data-bbox="1585 1129 1742 1177">4434</td> <td data-bbox="1742 1129 1877 1177">2709.76</td> </tr> <tr> <td data-bbox="1171 1177 1232 1225"></td> <td data-bbox="1397 1177 1585 1225">HSD 17660</td> <td data-bbox="1585 1177 1742 1225">4435</td> <td data-bbox="1742 1177 1877 1225">6920.21</td> </tr> <tr> <td data-bbox="1171 1225 1232 1273"></td> <td data-bbox="1397 1225 1585 1273">HSD 17661</td> <td data-bbox="1585 1225 1742 1273">4436</td> <td data-bbox="1742 1225 1877 1273">21.773</td> </tr> <tr> <td data-bbox="1171 1273 1232 1329"></td> <td data-bbox="1397 1273 1585 1329">HSD 17662</td> <td data-bbox="1585 1273 1742 1329">4437</td> <td data-bbox="1742 1273 1877 1329">32.472</td> </tr> </tbody> </table>	1	Sindora	Incorporated in 1983 and involved in oil palm and rubber and palm oil milling. A subsidiary of KMB and member of RSPO since Aug 2004.	2	REM	Established in 1937 under Eastern Tropical Product with rubber plantations. Over the years converted to oil palm cultivation known as Rubber Estate Of Malaya beginning 1968.	3	Sg Papan	Established in 1050. There were changes of ownership over the years. Mahamurni Plantations took over the management in 1982 and has maintained since.	4	Sindora POM	Built in Jan 1997 and commissioned on Sept 1998 at capacity of 30mt/hr until year 2000. in 2018 the mill capacity was upgraded to 45/hr capacity	No	Estate	No hak milik	No Lot /PT	acres	1	Sindora	HSD 17659	4434	2709.76		HSD 17660	4435	6920.21		HSD 17661	4436	21.773		HSD 17662	4437	32.472	
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		No hak milik	No Lot /PT	Ha		
	2	REM	HSD 73313	31578	783.7	
			HSD 48816	43578	166.06	
			HSD 49853	4376	51.18	
			HSD 49854	4377	105.2	
			HSD 13369	2135	1013.33	
			HSD 49874	4398	234.0	
			HSD 49875	4399	532.5	
			HSD 29320	1519	1607.39	
	3	Sg Papan	No hak milik	No Lot /PT	Ha	
			HSD 13163	70	349.24	
			HSD 13178	679	601.54	
			HSD 13177	8	11.787	
			HSD 13179	356	2028.68	
			HSD 13170	592	8.912	
		HSD 13169	219	7.001		
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	<p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>In case of any arising land dispute (if applicable), the process will be based on Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4).</p>			Complied	

4.4.2a	<p>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.</p> <p>- Minor compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>In case of any arising land dispute (if applicable), the process will be based on Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4).</p>	Complied															
4.4.2b	<p>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.</p> <p>- Minor compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>In case of any arising land dispute (if applicable), the process will be based on Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4).</p>	Complied															
4.4.2c	<p>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.</p> <p>- Minor compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>In case of any arising land dispute (if applicable), the process will be based on Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4).</p>	Complied															
4.4.3	<p>(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).</p> <p>- Critical (Major) compliance -</p>	<p>The estates maintained the following maps and documents for proof of recognized legal rights. Documents were sighted and verified. A scale of map at 1:10000 to 1: 15000 is established. Maps were prepared by AASD with data source GPS Surveyed and estates personnel.</p> <table border="1" data-bbox="1160 1249 1868 1398"> <thead> <tr> <th>No</th> <th>Items</th> <th>Sindora</th> <th>REM</th> <th>Sg Papan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>GPS survey</td> <td>/</td> <td>/</td> <td>/</td> </tr> <tr> <td>2</td> <td>Soil series</td> <td>/</td> <td>/</td> <td>/</td> </tr> </tbody> </table>	No	Items	Sindora	REM	Sg Papan	1	GPS survey	/	/	/	2	Soil series	/	/	/	Complied
No	Items	Sindora	REM	Sg Papan														
1	GPS survey	/	/	/														
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		<table border="1"> <tr> <td>3</td> <td>Topography</td> <td>/</td> <td>/</td> <td>/</td> </tr> <tr> <td>4</td> <td>Water ways model</td> <td>/</td> <td>/</td> <td>/</td> </tr> <tr> <td>5</td> <td>Field boundary</td> <td>/</td> <td>/</td> <td>/</td> </tr> <tr> <td>6</td> <td>Boundary stone</td> <td>/</td> <td>/</td> <td>/</td> </tr> <tr> <td>7</td> <td>Water Map</td> <td>/</td> <td>/</td> <td>/</td> </tr> </table> <p>All the related documentation regarding the land acquisition was kept in KMB HQ Office and was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. Hence, there was no need for the establishment of map showing the legal, customary, or user right of other users as required by this indicator.</p>	3	Topography	/	/	/	4	Water ways model	/	/	/	5	Field boundary	/	/	/	6	Boundary stone	/	/	/	7	Water Map	/	/	/	
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7	Water Map	/	/	/																								
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>In case of any arising land dispute (if applicable), the process will be based on Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4).</p>	Complied																									
4.4.5	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>In case of any arising land dispute (if applicable), the process will be based on Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4).</p>	Complied																									
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p>	Complied																									

		In case of any arising land dispute (if applicable), the process will be based on Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4).	
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 -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	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 -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable

	- Minor compliance -		
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
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.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	KULIM (M) Berhad has developed Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4). The objective is to establish and maintain the procedures on handling properties encroachment cases. Flow chart of handling the land encroachment by the company and local communities was	Complied

		developed. Besides, compensation calculation (based on situation and management approval) was described in the procedure as well.	
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>SOP as per indicator 4.6.1.</p> <p>There was no dispute that involved compensation in Sindora Complex.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>There were no scheme smallholders attached with Sindora Complex.</p>	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>There was no dispute that involved compensation in Sindora Complex.</p>	Complied
<p>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.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>KULIM (M) Berhad has developed Land Encroachment procedure (Doc. No.: PROP/MP/5 dated 09/06/2020, Rev. No. 4). The objective is to establish and maintain the procedures on handling properties encroachment cases. Flow chart of handling the land encroachment by the company and local communities was developed. Besides, compensation calculation (based on situation and management approval) was described in the procedure as well.</p>	Complied
4.7.2	<p>(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.</p>	<p>SOP as per indicator 4.6.1.</p>	Complied

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	- Critical (Major) compliance -		
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>There was no community that have lost access and rights to land for plantation since there was no expansion by the company during the time of audit. However, the company has provided job opportunity to the local communities as this has verified through the master list of employees.</p>	Complied
<p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied

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4.8.4	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). - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	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	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	N/A. Verified that there are no Independent and Scheme smallholders at Sindora Complex at the moment.	Not Applicable
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	N/A. Verified that there are no Independent and Scheme smallholders at Sindora Complex at the moment.	Not Applicable
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	N/A. Verified that there are no Independent and Scheme smallholders at Sindora Complex at the moment.	Not Applicable
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	N/A. Verified that there are no Independent and Scheme smallholders at Sindora Complex at the moment.	Not Applicable

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5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	N/A. Verified that there are no Independent and Scheme smallholders at Sindora Complex at the moment.	Not Applicable
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	N/A. Verified that there are no Independent and Scheme smallholders at Sindora Complex at the moment.	Not Applicable
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 -	Verified that there are no Independent and Scheme smallholders at Sindora Complex at the moment. The weighbridges been calibrated accordingly by Sindora POM for receiving the FFB from 3rd party suppliers. Seen the latest calibration sighted by Metrology Corporation Malaysia Sdn. Bhd. calibration Borang D (Timbang dan Sukat) Perakuan Penentuan Timbang Dan Sukat; Akta Timbang Dan Sukat 1972; Equipment S/N: 180250071, valid until 18/09/21.	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 -	N/A. Verified that there are no Independent and Scheme smallholders at Sindora Complex at the moment.	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 -	Sindora POM processed own crops and also FFB sourced from third party trader suppliers. Verified that no FFB sourced from Independent and Scheme smallholders at Sindora Complex at the moment. Nonetheless, they have the Grievance Procedure, Doc. No. SQD/SMS/4.1, Date: 1/08/20 for grievance handling.	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their	There were no smallholders crop received or processed by Sindora Palm Oil Mill, hence criteria 5.1 is not applicable.	Not Applicable

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	supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -		
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). - Minor compliance -	There were no smallholders crop received or processed by Sindora Palm Oil Mill, hence criteria 5.1 is not applicable.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There were no smallholders crop received or processed by Sindora Palm Oil Mill, hence criteria 5.1 is not applicable.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There were no smallholders crop received or processed by Sindora Palm Oil Mill, hence criteria 5.1 is not applicable.	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 were no smallholders crop received or processed by Sindora Palm Oil Mill, hence criteria 5.1 is not applicable.	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 -	KULIM (Malaysia) Berhad has established Core Labour Standard Policy dated 01/05/2018 where the company will not engage in nor support discrimination in any form. Briefing of the policy was conducted on 03/09/2020 to the workers in REM Estate and 21/09/2020 in Sungai Papan Estate. The policy was displayed at the notice board outside the office. Interviewed with the workers confirmed that the management treated all the workers equally.	Complied

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		Overtime was offered to anyone who is willing to work without forcing them and they are given freedom to association.	
6.1.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	The process of recruitment and promotion based on individual qualification and performance regardless of religion, race, age, gender, nationality or physical disability. Interviewed with the workers from different nationalities and gender confirmed that no discrimination happened in the company. The management treated all equally and provide equal opportunity for promotion based on capabilities. Female workers have been assigned as mandore as well. There was no recruitment fee being paid by the workers during the time of audit.	Complied
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>	The process of recruitment and promotion based on individual qualification and performance regardless of religion, race, age, gender, nationality or physical disability. Interviewed with the workers from different nationalities and gender confirmed that no discrimination happened in the company. The management treated all equally and provide equal opportunity for promotion based on capabilities. Female workers have been assigned as mandore as well. There was no recruitment fee being paid by the workers during the time of audit.	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>	Interviewed with the female workers confirmed that no pregnancy testing is conducted by the company as a measure for recruitment. Hospital Assistant will be informed if they are pregnant for any job transfer if related to chemical handling.	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>Gender committee was established and known as Women on Ward in KULIM (M) Berhad.</p> <p>Meeting was conducted on 12/10/2020 where the committee is formed by the female workers and housewives in the Sindora POM.</p>	Complied

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		<p>New mother, breastfeeding, sexual harassment and violence and complaint panel for women was briefed during the meeting. Interviewed with the female worker confirmed that no sexual harassment and violence case was reported.</p> <p>Sindora Estate has established WOW committee as well and last meeting was conducted on 23/01/2020 with total 18 participants. There was no report of sexual harassment and violence since year 2019. There were activities been organized throughout the year. However, there was no activity been organized since March 2020 as there was Movement Control Order and pandemic outbreak.</p> <p>REM Estate and Sungai Papan Estate has established WOW and meeting was last conducted on 23/09/2020 in REM Estate and 13/03/2020 in Sungai Papan Estate. All the policies were briefed again during the meeting to the committees especially the sexual harassment policy and grievance policy. No issue was reported in both estates.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Reviewed on the total 39 payslips (March 2020, June 2020, August 2020 and September 2020) which consists of male and female workers found that their salary is the same for the same job scope. They were paid according to the Minimum Wage Order 2020 without any discrimination. Overtime and work on rest day were paid according to Employment Act 1955.</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</p>	<p>All the workers have signed on the employment contract prior to work. The contract is in their national languages such as Bahasa</p>	Choose an item.

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	<p>national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Malaysia and Bengali. All the terms and conditions were clearly outlined in the contract and briefed to all the workers before they signed the contract during induction training. Sampled of the contracts as below:</p> <ul style="list-style-type: none"> a) Employee No.: 623205 (SPOM) b) Employee No.: 623014 (SPOM) c) Employee No.: 623145 (SPOM) d) Employee No.: 623230 (SPOM) e) Employee No.: 623238 (SPOM) f) Employee No.: 623184 (SPOM) g) Employee No.: 680750 (SE) h) Employee No.: 680697(SE) i) Employee No.: 680579 (SE) j) Employee No.: 680720 (SE) k) Employee No.: 680735 (SE) l) Employee No.: 680555 (SE) m) Employee No.: 604087 (REME) n) Employee No.: 604064 (REME) o) Employee No.: 604018 (REME) p) Employee No.: 604105 (REME) q) Employee No.: 604121 (REME) r) Employee No.: 604099 (REME) s) Employee No.: 626160 (SPE) t) Employee No.: 626119 (SPE) u) Employee No.: 626304 (SPE) v) Employee No.: 626025 (SPE) w) Employee No.: 626265 (SPE) 	
6.2.2	<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</p>	<p>Sampled total 39 employment contracts and payslips (March 2020, June 2020, August 2020 and September 2020). It has clearly stated that the payment and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday</p>	<p>Non-compliance</p>

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	<p>requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>entitlement, reasons for dismissal, period of notice) in the employment contract.</p> <p><u>Sungai Papan Estate:</u></p> <p><i>9 employment contracts signed by the contractor's workers (Passport No.: B5356944, C2150443, C3814674, B572100, C2150442, C5722849, B9965016, B9965021, C3816201) were sampled and found that terms and conditions below were not stated accordingly and correctly.</i></p> <ul style="list-style-type: none"> <i>i. Rest day on Sunday whereas actual rest day was Saturday</i> <i>ii. Period of notice from workers</i> <i>iii. Clause 21 (d) where workers need to pay the balance of levy to the employer if they terminate the contract before the end of 2 years' contract</i> <i>iv. Job title as General Worker whereas actual was Harvester</i> <p>Thus, a critical non-conformance was raised.</p>	
<p>6.2.3</p>	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Verified the checkroll workers' payslips confirmed that the workers were paid according to the Employment Act 1955 and Minimum Wage Order 2020. Deduction of wages was made as per approval from Labour Department.</p>	<p>Complied</p>
<p>6.2.4</p>	<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</p>	<p>Linesite inspection was carried out Hospital Assistant on weekly basis in Sindora Estate and Sindora POM by using the Housing Inspection Checklist. The last inspection was carried out from 11 – 16/10/2020. Any issue sighted during the inspection was recorded</p>	<p>Complied</p>

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	<p>upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>in the checklist with action taken to rectify. The inspection will be verified by Assistant Manager and Senior Manager.</p> <p>Hospital Assistant of REM Estate has carried out linesite inspection on weekly basis and once a month using the Linesite Management Guidelines checklist. The inspection will be cross-checked by the Assistant Managers of the estate. Linesite visit during audit found that no issue was sighted.</p> <p>Water and electricity were supplied by government and subsidized by the management. Clinic was available in the estates and the workers were provided with free medical facilities. Other welfare such as football field, mosque, temple, creche were available in the estates.</p>									
<p>6.2.5</p>	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Interviewed with the workers confirmed that they are easily access to adequate, sufficient and affordable foods where sundry shops are available inside the estates. Besides, some of the estates are located nearby to the town which easily accessible by the workers. REM Estate's management has arranged night market during pay day for the workers to purchase necessity and verified this with interviewed with workers.</p>	<p>Complied</p>								
<p>6.2.6</p>	<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: 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</p>	<p>KULIM (M) Berhad has established the prevailing wage calculation to include all the in-kind benefits provided to the workers. Sampled the prevailing wages for benefit as below:</p> <table border="1" data-bbox="1137 1145 1926 1393"> <thead> <tr> <th>Operating Unit</th> <th>In-kind benefit</th> <th>Cost/ worker (RM)</th> <th>Total Prevailing Wage (RM)</th> </tr> </thead> <tbody> <tr> <td>Sindora POM</td> <td>Housing Electricity & Water</td> <td>121.04 32.59</td> <td>3,045.49</td> </tr> </tbody> </table>	Operating Unit	In-kind benefit	Cost/ worker (RM)	Total Prevailing Wage (RM)	Sindora POM	Housing Electricity & Water	121.04 32.59	3,045.49	<p>Complied</p>
Operating Unit	In-kind benefit	Cost/ worker (RM)	Total Prevailing Wage (RM)								
Sindora POM	Housing Electricity & Water	121.04 32.59	3,045.49								

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<p>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 workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (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).</i></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. 	Education	21.62			
	Sindora Estate	Housing Electricity & Water Education	92.44 48 16.12	2,088.84	
	REM Estate	Housing Electricity & Water Education	161.23 46.18 25.89	1,590.79	
	Sg Papan Estate	Housing Electricity & Water Education	129.09 41.52 14.44	1,567.82	
	The prevailing wages is more than the Minimum Wage Order 2020.				

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	- Minor compliance -		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>All the core works are performed by permanent and full-time employees in Sindora Complex. There were contractors' workers working for harvesting in the estates permanently. There were no casual or temporary workers used in the company.</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>Kulim (Malaysia) Berhad has established Core Labour Standard Policy dated 1/05/2018 where the company recognized and respected the rights of employees to form and/ or join trade unions of their choice which are given due recognition by KULIM. The policy was in bi-lingual which is Bahasa Malaysia and English. Briefing of the policy was conducted on 03/09/2020 to the workers in REM Estate and 21/09/2020 in Sungai Papan Estate. Interviewed with the workers confirmed that they are allowing to join any workers' association freely such as NUPW.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Sindora POM has established NUPW committee and meeting was conducted which involved the participation of NUPW representatives, AMESU representative and management representative. The last meeting was conducted on 05/10/2020 and meeting minutes was sighted. There were issues raised during the meeting and the management has developed the action plan for the issues raised.</p> <p>There was a meeting conducted on 14/09/2020 with total 5 representatives from management and 5 representatives from employee in Sindora Estate. Seen the meeting minutes and the general issues were related to the housing repair.</p>	Complied

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		<p>REM Estates has established NUPW committee and meeting was conducted on 06/10/2020 to discuss issues of workers. Total 56 workers are member of NUPW. There was no issue reported during the meeting. Interviewed with the NUPW representative confirmed that there was no issue arise at this moment. They are allowing to have discussion with the management if there is any enquiry.</p> <p>Sungai Papan Estate has established NUPW committee and meeting was conducted on 17/09/2020. Issue reported was unclear of wages calculation especially on the overtime. The management has conducted a briefing on 16/10/2020 to all the workers regarding the wages and overtime payment calculation. Record of briefing was available.</p>	
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Interviewed with the workers confirmed that the election of the representatives was elected freely by the workers without any interference of management. They are aware of their own representative.</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>KULIM (Malaysia) Berhad has established Core Labour Standard Policy dated 01/05/2018 where they are not engaged in or support the use of Child Labour and will provide adequate support to enable children of its employees to attend and remain in school until no longer a child. Besides, the company has developed Buku Panduan Anggota Pekerja Perladangan dated 01/09/2018 where the company comply with the Children and Young Persons Employment Act 1966. Briefing of the policy was conducted on 03/09/2020 to the workers in REM Estate and 21/09/2020 in Sungai Papan Estate.</p>	Complied

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>KULIM (M) Berhad has developed procedures for Recruitment of Local Workers for Operating Units last updated on 01/10/2020 and Recruitment of New Foreign Workers last updated on 01/01/2019, Rev. No.: 1 where age verification will be part of the process during the recruitment process. As verified, a copy of identification card of local workers was obtained to ensure they meet the minimum age of employment. Document verified the master list of the workers confirmed that the minimum age of workers employed are above 16 years.</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There was no young person employed by the company as their minimum age was 18 years old for hazardous job and above 17 years old for general work. This has verified with the Master List and through interviewed with the stakeholders.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The policy has been briefed to the stakeholders during stakeholder meeting conducted on 27/08/2020 in Sindora Complex. Interviewed with the contractors and workers confirmed that there was no child labour employed in the company.</p>	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
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>KULIM (Malaysia) Berhad has developed Sexual Harassment Policy dated 01/05/2018 where the company seeks to eradicate all forms of sexual harassment in the workplace and wherever possible influence the behavior of its employees. KULIM has a zero tolerance on sexual harassment. Besides, the company has established Core Labour Standard Policy dated 01/05/2018 where the company recognized and respects the right of employees of their rights and freedoms relating to reproduction and reproductive health. Briefing of the policy to workers was conducted on 03/09/2020 in REM</p>	Complied

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		Estate and 21/09/2020 in Sungai Papan Estate. The policy was displayed at the notice board at the muster ground.	
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	KULIM (Malaysia) Berhad has established Core Labour Standard Policy dated 01/05/2018 where the company recognized and respects the right of employees of their rights and freedoms relating to reproduction and reproductive health. Briefing of the policy to workers was conducted on 03/09/2020 in REM Estate and 21/09/2020 in Sungai Papan Estate. The policy was displayed at the notice board at the muster ground.	Complied
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -	Management of Sindora POM, Sindora Estate and Sungai Papan Estate has conducted new mother census to the female workers who have baby or currently pregnant to identify their needs as new mother. The census was conducted on 05/10/2020 and total 2 female workers in Sindora POM, 11/10/2020 in Sindora Estate and 14/10/2020 in Sungai Papan Estate who are considered as new mother. Interviewed with new mothers in Sindora POM and Sindora Estate and they informed that the Chairman of Women on Ward has consulted their needs as new mother. All of them have no issue with the breastfeeding and the baby is sending to the creche located in the estate during working hour.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	A Complaint Panel for Women was established in Sindora POM, Sindora Estate and Sungai Papan Estate to train and provide counselling services on issues related to women involve in sexual harassment and violence. The function of the panel has been briefed to the female workers during the WOW meeting conducted on 12/10/2020.	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	(C) All workers have entered into employment voluntarily and the following are prohibited:	Interviewed with the workers confirmed that no forced and trafficked labour in Sindora Complex. The terms and conditions offered by the company were similar in their home country and	Complied

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	<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>when arrived in the plantations. No contract substitution has occurred. They kept their passport in the office for safety purpose and they can access to their passport anytime. The workers are entered to overtime voluntarily. There was no penalty for termination of employment if they wish to terminate the contract earlier as per the employment contract signed. They also allowed to move freely without any restriction. No recruitment fee was paid at home country. They only paid the statutory fee such as passport, medical fee and transportations in home country. KULIM has offered Foreign Workers Advance and Deduction Scheme to anyone who want to apply. The worker who take the scheme will sign on the Consent Letter of Borrow in home country. Deduction will be made on 2nd month after they arrived in Malaysia.</p>	
<p>6.6.2</p>	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Kulim (Malaysia) Berhad has developed Employee Handbook dated 01/09/2018 and Core Labour Standard Policy dated 01/05/2018. Besides, a Work Contract issued by Consulate Indonesia was signed by the workers prior to Malaysia. All the documents above have included the following terms:</p> <ol style="list-style-type: none"> a) No forced labour and no contract substitution for all the employees. b) Provide the appropriate trainings to each of the employees. c) The company will provide and ensure the facilities at least be at par with the minimum statutory requirements. d) The company will not engage in nor support discrimination in any form. e) Recruitment agencies are prohibited from charging candidates for recruitment fees and other expenses. <p>The company has implemented all the terms such as provide free and decent living condition to workers, induction training to</p>	<p>Complied</p>

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		<p>workers, no discrimination and no contract substitution verified through interviewed with the workers.</p> <p>Interviewed with the workers confirmed no contract substitution occurred during their recruitment. All the terms and conditions are identical as they have been promised in home country. They were provided with housing facilities and it is well maintained by the company. They informed that the management treated equally among of them.</p>	
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
<p>6.7.1</p>	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The responsible person(s) for H&S has been identified. Records of regular meetings between the responsible person(s) and workers were maintained accordingly. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded. Sampled details as follows:</p> <p>Sindora POM:</p> <p>OSH meeting conducted on quarterly basis. For year 2020 sampled the meeting minutes dated 28/08/2020, 26/06/2020 & 05/02/2020. The OSH discussion agenda was adequately addressed.</p> <p>OSH Committee Chart for year 2020 was available accordingly with adequate representatives from employee and employer. Appointed letter for OSH Committee members available with latest issuance for year 2020. Verified also that appointment letters for Chairman, Employees Representative and Employer Representative has been issued accordingly with the respective roles & responsibilities clearly stated in the appointment letters.</p>	<p>Complied</p>

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		<p>Sindora Estate:</p> <p>OSH meeting conducted on quarterly basis. For year 2020 sampled the meeting minutes dated 23/09/2020, 27/07/2020 & 13/03/2020. The OSH discussion agenda was adequately addressed.</p> <p>OSH Committee Chart for year 2020 was available accordingly with adequate representatives from employee and employer. Appointed letter for OSH Committee members available with latest issuance for year 2020. Verified also that appointment letters for Chairman, Employees Representative and Employer Representative has been issued accordingly with the respective roles & responsibilities clearly stated in the appointment letters.</p> <p>REM Estate:</p> <p>OSH meeting conducted on quarterly basis. For year 2020 sampled the meeting minutes dated 21/09/2020, 18/06/2020 & 13/02/2020. The OSH discussion agenda was adequately addressed.</p> <p>OSH Committee Chart for year 2020 was available accordingly with adequate representatives from employee and employer. Appointed letter for OSH Committee members available with latest issuance for year 2020. Verified also that appointment letters for Chairman, Employees Representative and Employer Representative has been issued accordingly with the respective roles & responsibilities clearly stated in the appointment letters.</p> <p>Sungai Papan Estate:</p>	
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		<p>OSH meeting conducted on quarterly basis. For year 2020 sampled the meeting minutes dated 10/09/2020, 7/07/2020 & 10/03/2020. The OSH discussion agenda was adequately addressed.</p> <p>OSH Committee Chart for year 2020 was available accordingly with adequate representatives from employee and employer. Appointed letter for OSH Committee members available with latest issuance for year 2020. Verified also that appointment letters for Chairman, Employees Representative and Employer Representative has been issued accordingly with the respective roles & responsibilities clearly stated in the appointment letters.</p>	
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 equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency procedures have been communicated accordingly to employees, contractors and visitors.</p> <p>Fire Evacuation drill is planned annually. Fire Drill for Sindora POM for year 2020 is planned to be done on 08/11/2020. It has been rescheduled from the original planned month of September 2020 due to the COVID-19 pandemic. This will be further verified during the next assessment visit. The fire drill for year 2019 has been done accordingly on 01/10/2019. As for Sindora Estate, the fire drill was conducted on 18/10/2020, at REM Estate the fire drill was done on 11/10/2020 and Sungai Papan Estate the fire drill was done accordingly on 22/01/2020.</p> <p>Accident and emergency procedures are in English/Bahasa Malaysia and this is understood by the responsible workers, staff or executives involved in the operation. Good understanding level observed among the workers.</p> <p>Training for First Aid is conducted on annual basis. Adequate first aiders trained available. Latest First Aid Training done dated 02/09/2020 at Sindora POM, 02/09/2020 at Sindora Estate and 14/10/2020 at REM Estate.</p>	Complied

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		<p>First aid equipment is available at worksites. During the site visit there is evident that First Aid Box is available at the relevant area.</p> <p>Fire extinguisher (ABC Powder) assessed during the site observation are available and within the expiry date.</p> <p>Portable emergency eye wash & shower facility available at chemical store, workshop and mixing area as applicable.</p> <p>At Sindora POM, as to date for year 2020, there has been 1 accident occurred with medical leave 10 days. Verified the JKKP 6 submission (MC>4days), including Accident Investigation Report and HIRARC review has been carried out accordingly.</p> <p>At Sindora Estate, 2 reportable accidents occurred with JKKP 6 submission (MC>4days) for year 2020. Verified that the Accident investigation has been carried out accordingly along with HIRARC review.</p> <p>At REM Estate & Sungai Papan Estate, verified that no accidents have occurred as to date for year 2020.</p> <p>DOSH visit have been recorded in the DOSH log book. Sampled the latest DOSH visit recorded dated 19/08/2020 at Sindora Mill, 12/6/2019 at Sindora Estate and 14/01/2020 at Sungai Papan Estate The inspection comments been actioned accordingly by the estates and mill.</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 those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>Appropriate personal protective equipment (PPE) been provided is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. Sampled PPE issuance records were as below:</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>Sindora POM:</p> <ul style="list-style-type: none"> a) Safety Shoe dated 30/03/2020 b) Leather Glove dated 17/03/2020 c) Respirator Cartridge Renewal dated 12/04/2020 <p>Sindora Estate:</p> <ul style="list-style-type: none"> a) Respirator dated 02/01/2020 b) Respirator Filter dated 09/01/2020 c) Apron dated 09/03/2020 d) Nitrile Glove dated 07/07/2020 e) Goggle dated 22/01/2020 <p>REM Estate:</p> <ul style="list-style-type: none"> a) Respirator dated 02/01/2020 b) Safety Helmet dated 08/01/2020 c) Rubber Boot dated 02/01/2020 d) Eye Protector dated 08/01/2020 e) Sickle dated 02/01/2020 f) IPM & PPE Training dated 07/10/2020 <p>Sungai Papan Estate:</p>	
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		<p>a) Goggle dated 19/02/2020</p> <p>b) Respirator dated 16/04/2020</p> <p>c) Rubber Glove dated 05/02/2020</p> <p>d) Mask N95 dated 18/10/2020</p> <p>e) Safety Shoe dated 16/04/2020</p>	
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care and accident insurance are provided to all the employees. Workers are covered under SOCSO scheme. Seen the SOCSO scheme payment schedule at Sindora POM, Sindora Estate and Sungai Papan Estate for July 2020, August 2020 & September 2020. Above Sosco submission were done using the Borang 8A. Details of the Employer and worker’s details been available accordingly.</p>	Complied
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Records on Lost Time Accident (LTA) metrics at POM and estates had been verified. Details as follows:</p> <p>a) Sindora POM – Annual JKPP 8 Submission to DOSH has been submitted accordingly on 21/01/2020. Verified the submission letter ref. no. JKPP 8/43942/2019.</p> <p>b) Sindora Estate - Annual JKPP 8 Submission to DOSH has been submitted accordingly on 28/01/2020. Verified the submission letter ref. no. JKPP 8/50181/2020.</p> <p>c) REM Estate - Annual JKPP 8 Submission to DOSH has been submitted accordingly on 14/01/2020. Verified the submission letter ref. no. JKPP 8/48482/2019.</p> <p>d) Sungai Papan Estate - Annual JKPP 8 Submission to DOSH has been submitted accordingly on 13/01/2020. Verified the submission letter ref. no. JKPP 8/45288/2019.</p>	Complied

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	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>IPM includes the planting of beneficial plants and control of damage by rodents, leaf-eaters, orytes and natural enemies. Beneficial plants such as Turnera subulata, Antigonon Leptopus and Cassia Cobanensis are grown in the estates. Records of planting of new areas and maintenance of existing areas of beneficial plants, location maps and barn owl census are available.</p> <p>Sampled as follows:</p> <p>Sindora Estate:</p> <table border="1"> <thead> <tr> <th>Field/Block</th> <th>Program Hectare covered 2020 (ha)</th> <th>Month Planted</th> <th>Month Completed</th> <th>Type of Beneficial Plant</th> </tr> </thead> <tbody> <tr> <td>P06/1</td> <td>15</td> <td>Feb-20</td> <td>Mar-20</td> <td>Turnera subulata</td> </tr> <tr> <td>P10/1</td> <td>10</td> <td>Mar-20</td> <td>May-20</td> <td>Antigonen leptopus/ Turnera subulata</td> </tr> <tr> <td>P06/5</td> <td>20</td> <td>Feb-20</td> <td>Mar-20</td> <td>Cassia cobanensis/ Turnera Subulata</td> </tr> </tbody> </table>			Field/Block	Program Hectare covered 2020 (ha)	Month Planted	Month Completed	Type of Beneficial Plant	P06/1	15	Feb-20	Mar-20	Turnera subulata	P10/1	10	Mar-20	May-20	Antigonen leptopus/ Turnera subulata	P06/5	20	Feb-20	Mar-20	Cassia cobanensis/ Turnera Subulata	Complied
Field/Block	Program Hectare covered 2020 (ha)	Month Planted	Month Completed	Type of Beneficial Plant																					
P06/1	15	Feb-20	Mar-20	Turnera subulata																					
P10/1	10	Mar-20	May-20	Antigonen leptopus/ Turnera subulata																					
P06/5	20	Feb-20	Mar-20	Cassia cobanensis/ Turnera Subulata																					

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		<p>At REM Estate:</p> <p>Periodical monitoring was carried out Barn Owl Boxes to check on its condition. Barn Owl Census of Occupancy for year 2020 was also available accordingly. Sampled for Field P14, P12 & P10 dated 23/08/2020 which includes Ha, No. of Boxes, Density, No. of Boxes Occupied, Occupancy Rate, Total No. of Adult Birds, Chicks & Eggs.</p> <p>At Sungai Papan Estate:</p> <p>Periodical monitoring was carried out Barn Owl Boxes to check on its condition. Barn Owl Census of Occupancy for year 2020 was also available accordingly. Sampled for Field P03, P04 & P05 for month of September 2020 which includes Ha, No. of Boxes, Density, No. of Boxes Occupied, Occupancy Rate, Total No. of Adult Birds, Chicks & Eggs.</p>	
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 been used in managed areas. The estates have adequate continuous monitoring plan in place to ensure the compliance.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>Verified during the estate field visit that there is no use of fire for pest control. This was compiled accordingly with the Sustainability Hand Book, June 2007 on commitment on zero fire burning technique.</p>	Complied
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
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>Justification of pesticides applied is available in the agriculture manual. Refer to agriculture manual 31/10/2017, H01: Justification of Chemical Use. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species. Among the pesticides used Foxil</p>	Complied

		(Tryclopvr butaxy ethylester 32.1%), Ken Amine (2-4D dimethyl amine 60%), Ken-Glyphosate/Supresate (Glyphosate Isopropylamine 41%), Ebor2030 (Brodifacoum 0.003%)																									
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>Sindora Estate, REM Estate & Sungai Papan Estate continued to maintain their records of pesticides consumption and updated on monthly basis. The information about LD50, and A.I applied per ha was available for verification.</p> <p>Sindora Estate:</p> <table border="1" data-bbox="1137 662 1496 1161"> <thead> <tr> <th>Month</th> <th>AI/ha</th> </tr> </thead> <tbody> <tr> <td>Jan-20</td> <td>0.1844</td> </tr> <tr> <td>Feb-20</td> <td>0.2034</td> </tr> <tr> <td>Mar-20</td> <td>0.1334</td> </tr> <tr> <td>Apr-20</td> <td>0.0472</td> </tr> <tr> <td>May-20</td> <td>0.1431</td> </tr> <tr> <td>June-20</td> <td>0.2052</td> </tr> <tr> <td>Jul-20</td> <td>0.1524</td> </tr> <tr> <td>Aug-20</td> <td>0.1317</td> </tr> <tr> <td>Sept-20</td> <td>0.1165</td> </tr> </tbody> </table> <p>REM Estate:</p> <table border="1" data-bbox="1137 1262 1496 1359"> <thead> <tr> <th>Month</th> <th>AI/ha</th> </tr> </thead> <tbody> <tr> <td>Jan-20</td> <td>0.1917</td> </tr> </tbody> </table>	Month	AI/ha	Jan-20	0.1844	Feb-20	0.2034	Mar-20	0.1334	Apr-20	0.0472	May-20	0.1431	June-20	0.2052	Jul-20	0.1524	Aug-20	0.1317	Sept-20	0.1165	Month	AI/ha	Jan-20	0.1917	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 FY 2020 where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan. Sighted during the site visit the establishment of beneficial</p>	Complied																																

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		plants along the estate roads and immature areas as well as barn owl boxes placed at intended areas. Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead.	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	There was no prophylactic use of pesticides in the estates. The application of pesticides was based on level of attack severity which was normally obtained through census.	Complied
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: 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. - Minor compliance -	Based on chemical register dated 20/01/2020 at Sindora Estate, chemical register dated 10/01/2020 at REM Estate and chemical register dated 23/1/2020 at Sungai Papan Estate verified that no WHO class IA and IB pesticides used. The used of Paraquat is banned. Only class II, III and IV chemicals used in the estates. This was verified further by visiting the chemical store and field visit during spraying/pesticide application activities.	Complied
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	Pesticides operators for all estates visited has been provided with proper Personal Protective Equipment. Observed during site visit, the PPE provided to the operators such as google, face respirator, nitrile hand glove, rubber boot and apron. Additionally, the operators have been given training as detailed in criterion 3.7.2	Complied

	- Critical (Major) compliance -	regarding the usage safety and health issue and proper way for chemical application.	
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 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 adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>All chemical containers were reused as premix containers to transport diluted chemicals to the fields for application purpose. Otherwise the unused chemical containers are disposed to the DOE approved licensed waste collectors.</p> <p>At Sindora Estate, the containers were collected by Kualiti Alam Sdn Bhd as SW 409. Sampled the latest disposal was dated 18/10/2020 at Sindora Estate.</p> <p>At REM Estate, the triple rinsed and punctured containers were collected by G-Planter Sdn Bhd. Sampled the latest disposal was dated 6/8/2020.</p> <p>At Sungai Papan Estate, the triple rinsed and punctured containers were collected by Kualiti Alam Sdn Bhd. Sampled the latest disposal was dated 25/8/2020.</p>	Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is</p>	<p>Pesticide application by aerial spraying is not practiced by Sindora Complex.</p>	Complied

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	<p>provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -</p>		
<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>Sindora Estate Annual Medical Surveillance has been conducted accordingly on 03/10/2020 for all workers exposed to related chemicals as per CHRA recommendation. The Medical Surveillance conducted for 20 workers by DOSH Reg. OHD No. HQ/11/DOC/00/235. Results indicates all 20 workers were fit and 4 workers were unfit to work. The 4 unfit workers has been reassigned to other job and pending further follow up medical check-up. No pregnant/nursing workers were involved in pesticide handling works.</p> <p>REM Estate Annual Medical Surveillance has been conducted from August 2020 until September 2020 for all workers exposed to related chemicals as per CHRA recommendation. Seen the Medical Surveillance report dated 16/10/2020 conducted for 60 workers by DOSH Reg. OHD No. HQ/11/DOC/00/235. Results indicates all 59 workers were fit and 1 worker were unfit to work. The 1 unfit worker has been reassigned to other job and pending further follow up medical check-up. JKPP 7 & USECHH 5i has been submitted accordingly. No pregnant/nursing workers were involved in pesticide handling works.</p> <p>Sungai Papan Estate Annual Medical Surveillance has been conducted on 18/10/2020 for all workers exposed to related chemicals as per CHRA recommendation. The official report is still pending from the DOSH Reg. OHD No. HQ/11/DOC/00/235. The estate is closely following up on the matter and further verification will done during the next assessment visit. No pregnant/nursing workers were involved in pesticide handling works.</p>	<p>Complied</p>

7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Verified that no work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions in the estates.</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>The Sindora Complex had identified all wastes and sources of pollution. The Waste Management Action Plan 2020 were established to mitigate and control the identified wastes and source of pollution. The common significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1137 778 1917 1174"> <thead> <tr> <th></th> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)-GHG</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>Land</td> <td>Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.</td> </tr> </tbody> </table> <p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2020. The waste generated from the mill/estates operations as shown below:</p> <table border="1" data-bbox="1167 1362 1908 1396"> <thead> <tr> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>		Receptor	Sources	1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)-GHG	2	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	Land	Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.	Type of waste	Details			Complied
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7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>In Sindora POM and the estates in the Sindora Complex, procedure SNPOM/W1/17 – Scheduled Wastes (Hazardous Waste) Management has been established.</p> <p>a) Management and disposal of waste water 2020 has been established compiled by Assistant Engineer/Assistants/Staff.</p> <p>b) Waste Management Plan 2020 has been established prepared by SQD and verified by the Assistant Engineer/Assistants/Manager.</p> <p>c) Waste Management Plan 2020 has been established in Jan 2020. The management Plan for 2020 has yet to be finalised the source and disposal method of scheduled waste, domestic waste and industrial waste.</p>	Complied																								

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- d) Based on Environmental Impact Evaluation improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination.
- e) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.
- f) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The Sindora Complex scheduled waste is disposed to the Kualiti Alam Sdn Bhd registered with DOE.

Mill	Date	SW 305	SW 404	SW 410	SW 408	SW 307
SPOM	18/9/20	1.110	-	0.027	0.015	0.020
Estate	Date	SW 102	SW 110	SW 410	SW 408	SW 307
SE	18/10/20	0.015	0.098	0.023	0.083	0.314
REM	06/8/20	-	0.005	0.011	0.019	0.580

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SPE	27/8/20	-	0.02 5	0.01	0.04 4	0.06
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The Sindora Complex scheduled waste is disposed to the following vendors registered with DOE.

Estate	Date	SW Buyers/Vendor
Sindora	30/04/2021	Kualiti Alam Sdn Bhd
REM	30/04/2021	Kualiti Alam Sdn Bhd
Air Papan	30/04/2021	Kualiti Alam Sdn Bhd
SPOM	30/04/2021	Kualiti Alam Sdn Bhd

Empty containers for REM estate were despatched to licensed buyer G -Planter. Sighted 06/08/2020 REM - 30 units of 4 L containers, 130 units 10 kg containers.

Domestic waste for the operating units in Sindora Complex was disposed as follows:

Estate	Landfill site in Estate	Remarks
REM	P10 Blk 1	Collection 2/3 x week
SE	P06 Blk 3	Collection 2/3 x week
SPE	P03 Blk 8	Collection 2/3 x week
SPOM	P06 Blk 3	Collection 2/3 x week

		Sindora Estate manages the same landfill for Sindora Mill. All landfill site were visited and verified for compliance.	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	KMB practices of "Zero open burning" is enforced and elaborated in the Sustainability Policy. The operating units adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. Both estates had replanting program spanned over the forthcoming years In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.	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 -	The Sindora Complex continued to use and implement SOP for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOP were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOP. <ul style="list-style-type: none"> a) KMB Agriculture Manual 1998 b) Sustainability Management System SOP - 2007 c) Quality Manual Jan 2018 d) Integrated Management Manual Jan 2018. e) Working Instruction ref SNPOM/W1 Jan 2018 f) Safety Standard Operating Procedures (SSOP) dated 25/02/2015, g) Pictorial Safety Standards and Security Guidelines (PSS). h) Laboratory Process Control Manual 	Complied

		<p>i) Security Guidelines</p> <p>All the estates and mill operations were guided through the manuals and SOP. The procedures as documented in the KMB Agriculture Manual were disseminated to the staff/workers through morning briefings and training. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The documents included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.</p>													
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 tissue and soil sampling were carried out in the Estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. For all 3 estates Agronomic assessment and fertiliser recommendation was conducted by Agricultural Agronomic Services Dept to formulate the FY2020 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca & B had been were carried out in all estates. The latest being:</p> <table border="1" data-bbox="1249 1209 1881 1375"> <thead> <tr> <th></th> <th>Estate</th> <th>Report Date</th> <th>Report No</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>REM</td> <td>PSK/0023/20 01</td> <td>24/01/2020</td> </tr> <tr> <td>2</td> <td>Sindora</td> <td>1911/SIN/142 2</td> <td>29/11/2019</td> </tr> </tbody> </table>		Estate	Report Date	Report No	1	REM	PSK/0023/20 01	24/01/2020	2	Sindora	1911/SIN/142 2	29/11/2019	Complied
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1	REM	PSK/0023/20 01	24/01/2020												
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		<table border="1" data-bbox="1249 363 1886 402"> <tr> <td>3</td> <td>Sg Papan</td> <td>Foliar/1/2020</td> <td>25/08/2020</td> </tr> </table> <p>Soil analysis for PH, Org C, Total N, Total P, Avail P, Exch K, Exch Ca & Exch Mg was carried out on a year cycle basis with the recent carried out as follows:</p> <table border="1" data-bbox="1249 561 1886 699"> <thead> <tr> <th></th> <th>Estate</th> <th>Report No</th> <th>Report Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>REM</td> <td>0373-0376</td> <td>12/01/2020</td> </tr> <tr> <td>2</td> <td>Sindora</td> <td>1812/0306</td> <td>20/12/2018</td> </tr> <tr> <td>3</td> <td>Air Papan</td> <td>0309-0312</td> <td>08/09/2019</td> </tr> </tbody> </table> <p>All foliar and soil sampling & analysis was conducted by Ulu Tiram Central Laboratory. Soil analysis is made yearly on different fields.</p>	3	Sg Papan	Foliar/1/2020	25/08/2020		Estate	Report No	Report Date	1	REM	0373-0376	12/01/2020	2	Sindora	1812/0306	20/12/2018	3	Air Papan	0309-0312	08/09/2019											
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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>All the 3 estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of compost. In addition, during replanting, palms were felled, chipped, windowed and left to decompose. Records showed that Sindora Estate had applied EFB at 50 tons/Ha applied 2019/20 as follows:</p> <table border="1" data-bbox="1249 1104 1841 1396"> <thead> <tr> <th></th> <th>Estate</th> <th>Field no</th> <th>Ha</th> <th>Mt</th> </tr> </thead> <tbody> <tr> <td></td> <td>Sindora</td> <td>P06/1</td> <td>212.72</td> <td>10636</td> </tr> <tr> <td>1</td> <td>Sindora</td> <td>P08</td> <td>193.40</td> <td>96.70</td> </tr> <tr> <td>2</td> <td>Sindora</td> <td>P10</td> <td>126.88</td> <td>6344</td> </tr> <tr> <td>3</td> <td>Sg Papan</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>4</td> <td>REM</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>		Estate	Field no	Ha	Mt		Sindora	P06/1	212.72	10636	1	Sindora	P08	193.40	96.70	2	Sindora	P10	126.88	6344	3	Sg Papan	-	-	-	4	REM	-	-	-	Complied
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3	Sg Papan	-	-	-																													
4	REM	-	-	-																													

7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilizer application program was monitored using records like program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc. Records of programs and applications of fertilizers were reviewed by auditors. Review of the records revealed that the actual fertilizers applied in 2019/20 was in line with the program. The following fertilizers were applied in the estates on recommendation by the Agronomist.</p> <table border="1" data-bbox="1249 603 1845 1002"> <thead> <tr> <th></th> <th>Fertiizer</th> <th>Kg/palm</th> <th>application month</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>A chloride</td> <td>1.50-1.75</td> <td>Jan - Feb</td> </tr> <tr> <td>2</td> <td>MOP</td> <td>1.50-2.25</td> <td>Jan - Feb</td> </tr> <tr> <td>3</td> <td>HGFB</td> <td>0.10</td> <td>July - Aug</td> </tr> <tr> <td>4</td> <td>KKS44B</td> <td>2.50</td> <td>June-July</td> </tr> <tr> <td>5</td> <td>A Sulphate</td> <td>2.50</td> <td>May</td> </tr> </tbody> </table>		Fertiizer	Kg/palm	application month	1	A chloride	1.50-1.75	Jan - Feb	2	MOP	1.50-2.25	Jan - Feb	3	HGFB	0.10	July - Aug	4	KKS44B	2.50	June-July	5	A Sulphate	2.50	May	Complied
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<p>Criterion 7.5: Practices minimise and control erosion and degradation of soils.</p>																											
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was available. The soil series in the estates were classified as follows:</p> <table border="1" data-bbox="1196 1166 1877 1394"> <thead> <tr> <th>No</th> <th></th> <th>REM</th> <th>Sindora</th> <th>Sg Papan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Allv river</td> <td>0.00</td> <td>4.48</td> <td>2.01</td> </tr> <tr> <td>2</td> <td>Rengam</td> <td>22.14</td> <td>93.2</td> <td>18.52</td> </tr> <tr> <td>3</td> <td>Batu Lapan</td> <td>0.34</td> <td>0.00</td> <td>2.11</td> </tr> </tbody> </table>	No		REM	Sindora	Sg Papan	1	Allv river	0.00	4.48	2.01	2	Rengam	22.14	93.2	18.52	3	Batu Lapan	0.34	0.00	2.11	Complied				
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7.5.2	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.	Like all KMB Estates, the estates visited in Sindora Complex continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:	Complied																																																																											

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	<p>- Minor compliance -</p>	<p>a) Slope & River Protection Policy Section A17 KMB Manual b) Buffer Zone & 25-degree slope in Section A07 KMB Manual c) Land Preparation for Terracing in Section A08 KMB Manual.</p> <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in some mature areas. The cover crop <i>mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>neprolepis biserrata</i> in the inter rows were sighted during the visit. The slope maps were provided by the AASD (Agronomy Advisory Service Dept) with details as follows:</p> <table border="1" data-bbox="1173 836 1850 1123"> <thead> <tr> <th>No</th> <th>Topography</th> <th>REM</th> <th>Sindora</th> <th>Sg Papan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0-2</td> <td>27.89</td> <td>4.48</td> <td>6.73</td> </tr> <tr> <td>2</td> <td>2-6</td> <td>53.00</td> <td>26.5</td> <td>20.05</td> </tr> <tr> <td>3</td> <td>6-12</td> <td>14.79</td> <td>34.72</td> <td>54.38</td> </tr> <tr> <td>4</td> <td>12-20</td> <td>3.53</td> <td>31.98</td> <td>18.84</td> </tr> <tr> <td>5</td> <td>20-25</td> <td>0.73</td> <td>0</td> <td>0</td> </tr> <tr> <td>6</td> <td>>25</td> <td>0.06</td> <td>2.32</td> <td>0</td> </tr> <tr> <td></td> <td>Total</td> <td>100%</td> <td>100%</td> <td>100%</td> </tr> </tbody> </table>	No	Topography	REM	Sindora	Sg Papan	1	0-2	27.89	4.48	6.73	2	2-6	53.00	26.5	20.05	3	6-12	14.79	34.72	54.38	4	12-20	3.53	31.98	18.84	5	20-25	0.73	0	0	6	>25	0.06	2.32	0		Total	100%	100%	100%	
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7.5.3	<p>There is no new planting of oil palm on steep terrain. - Minor compliance -</p>	<p>This compliance being addressed in the Sustainable Policy - "<i>Slope and River Protection</i>" signed by the ED dated May 2018 stating the following among others; "Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly".</p>	Complied																																								

Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(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. - Critical (Major) compliance -	Soil surveys are made and available in a soil map for all the estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates. All estates in the Sindora Complex had no new planting for the current year and also for the forthcoming 5 years operations.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	KMB Group had no planting on areas of more than 25 degree. Plantings on steep slope are either avoided or minimized.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys are done and available in a soil map at all estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates	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 -	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates	Not Applicable

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	- Critical (Major) compliance -		
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The water and ground cover management programme is documented in the KMB Agricultural Manual (Water Management in Inland, Coastal and Peat lands) issued on 01/07/2011. Details are described in 7.8.1. individual estates and mill had their respective water management plan mainly to monitor among others the following;</p> <p>a) Monitor the quality of main water inlet/outlet for pollutants from estate's operations. b) Contingency during water shortage. c) Monitor the usage of fresh water on monthly basis d) Reuse/recycle waste water.</p>	Complied
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates</p>	Not Applicable
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>There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates</p>	Not Applicable

	- Critical (Major) compliance -												
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>	There is no peat soil or soil categorized as marginal or fragile soil in all estates visited. There was also no new planting in the estates	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 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>	<p>The mill water management plan has been established with the recent review made on respectively by the OU. Among others the plan therein has emphasized;</p> <p>a) rain water harvesting for cleaning purposes, b) water from the reservoir/catchment for the mill operations c) continual training for workers on water efficiency consumption, d) desilting of water reservoir to retain the reservoir optimal capacity. e) The action plan in event of draught/water pollution and</p> <p>The estates similarly possessed the following water management plan. Among others containing the following initiatives.</p> <table border="1"> <thead> <tr> <th></th> <th>Source</th> <th>Activity</th> <th>Threat</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reservoir/</td> <td>Chemical mixing</td> <td>Pollution Draught</td> <td>Enforcement of buffer zone as non-spraying activities.</td> </tr> </tbody> </table>		Source	Activity	Threat	Action Plan	1	Reservoir/	Chemical mixing	Pollution Draught	Enforcement of buffer zone as non-spraying activities.	Complied
	Source	Activity	Threat	Action Plan									
1	Reservoir/	Chemical mixing	Pollution Draught	Enforcement of buffer zone as non-spraying activities.									

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			pond/ SAJ/ Rain		Wastage		
		2	General Upkeep	Pollution Draught Wastage	Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.		
		3	Line site	Pollution Draught Wastage	Every house is supplied with containers. To schedule water supply to avoid wastage. Awareness on water usage efficiency. Outsource from neighboring estates.		
		4	Drain upkeep	Interrupt ion water flow at drainage system.	Periodic desilting Building of sand bags at specific points to contain water (weirs)		
		5		Water pollution	Prohibit workers from activities at water source Drinking water analysis. Monitor condition of septic tank		

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				Adhere SW management procedure to avoid pollution caused by SW.																																								
<p>Water Management Plan review date was sighted and verified with records as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Estate/Mill</th> <th>Review date</th> <th>Issues</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Sindora</td> <td>24/08/2020</td> <td>Nil</td> </tr> <tr> <td>2</td> <td>REM</td> <td>May 2020</td> <td>Nil</td> </tr> <tr> <td>3</td> <td>Sg Papan</td> <td>Aug 2020</td> <td>Nil</td> </tr> <tr> <td>4</td> <td>Sindora POM</td> <td>24/08/2020</td> <td>Nil</td> </tr> </tbody> </table> <p>The Mill Identification & Management of Waste Water 2020 among others as summarized below;</p> <table border="1"> <thead> <tr> <th></th> <th>location</th> <th>Waste produced water</th> <th>Treatment/containment</th> <th>Reuse/recycle/disposal method</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Processing stations</td> <td>Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water</td> <td>Oil recovery/ETP</td> <td>Recover into system</td> </tr> <tr> <td>2</td> <td>Boiler</td> <td>Blow down, cleaning water</td> <td>Sludge pit, ETP</td> <td>Monsoon drain</td> </tr> <tr> <td></td> <td>Process ramp</td> <td>Rainfall runoff</td> <td>Sedimentation trap</td> <td>Monsoon drain</td> </tr> </tbody> </table>						Estate/Mill	Review date	Issues	1	Sindora	24/08/2020	Nil	2	REM	May 2020	Nil	3	Sg Papan	Aug 2020	Nil	4	Sindora POM	24/08/2020	Nil		location	Waste produced water	Treatment/containment	Reuse/recycle/disposal method	1	Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ETP	Recover into system	2	Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain		Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain
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		3	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain																			
		4	Lab	Cleaning water	Process drain	Monsoon drain																			
		5	Wash room	Toilet water, cleaning water	Septic tank	Collected by licensed contractor.																			
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>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones has been verified at the 3 Estates and mill catchment. Riparian buffer zones have been identified and demarcated. No chemicals and fertilizer application observed been used in their maintenance. In some areas Guatemala grass were planted along the river banks. Guidelines of the width of the rivers and natural courses to be protected have been illustrated in the SOP revised dated 01/11/2018. The buffer zones established are as following:</p> <table border="1" data-bbox="1216 1031 1736 1267"> <thead> <tr> <th></th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>>40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>Buffer zones were protected. Areas visited for the estates as tabled below:</p>						River width	Buffer zone	1	>40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters	Complied
	River width	Buffer zone																							
1	>40 meters	50 meters																							
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5	< 5 meters	5 meters																							

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	Estates	Location	Field no
1	Sindora	Field Stream	P10 Blk 2
2	Sindora	Field Stream	P10 Blk 4
3	Sindora	Water Catchment	P12 Blk 4
4	REM	Sg Berangan	P12 Bik 2
5	Sg Papan	Sg Petai	P08 Blk 2

Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. Extracted record of the estates with details below;

REM Estate 27/07/2020		Sg Berangan		Limit	
Parameter	unit	Pt A	Pt B		
1	Phosphate	mg PO4/L	<0.2 0	0.20	0.20
2	Nitrate nitrogen	mg NO3N/L	0.19	0.84	7.00

Sindora Estate 24/08/2020					
Parameter	unit	Pt A	Pt B	Pt A	
1	Phosphate	mg PO4/L	<0.2	<0.2	0.34

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		<table border="1" data-bbox="1160 363 1863 443"> <tr> <td>2</td> <td>Nitrate nitrogen</td> <td>mg NO3N/L</td> <td>1.51</td> <td>1.04</td> <td>1.50</td> </tr> </table> <table border="1" data-bbox="1160 497 1863 794"> <thead> <tr> <th colspan="2"></th> <th>Sg Papan Estate 28/09/2020</th> <th colspan="2">Sg Petai</th> <th>Limit</th> </tr> <tr> <th></th> <th>Parameter</th> <th>unit</th> <th>Pt A</th> <th>Pt B</th> <th></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Phosphate</td> <td>mg PO4/L</td> <td><0.2 0</td> <td><0.2 0</td> <td>0.20</td> </tr> <tr> <td>2</td> <td>Nitrate nitrogen</td> <td>mg NO3N/L</td> <td>0.05</td> <td>0.19</td> <td>7.00</td> </tr> </tbody> </table> <p data-bbox="1137 849 1930 938">The limit for phosphate and nitrate is 0.2 ppm and 7 ppm respectively. There were no issues on the water quality for the sampling points.</p>	2	Nitrate nitrogen	mg NO3N/L	1.51	1.04	1.50			Sg Papan Estate 28/09/2020	Sg Petai		Limit		Parameter	unit	Pt A	Pt B		1	Phosphate	mg PO4/L	<0.2 0	<0.2 0	0.20	2	Nitrate nitrogen	mg NO3N/L	0.05	0.19	7.00	
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1	Phosphate	mg PO4/L	<0.2 0	<0.2 0	0.20																												
2	Nitrate nitrogen	mg NO3N/L	0.05	0.19	7.00																												
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 effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No over flow was observed, and flow meter reading was recorded daily. The mill monitoring the effluent and submits to DOE through 'Borang Penyata Suku Tahunan'. Sindora Palm DOE license 004718 was for land application and the requirement is for the BOD to be less than 100 mg/l. The results from final discharge were compliance within parameter limit. Record was sighted and verified.</p> <table border="1" data-bbox="1160 1315 1930 1382"> <thead> <tr> <th>Sample date</th> <th>Std</th> <th>13/04/2020</th> <th>05/05/2020</th> <th>10/06/2020</th> </tr> </thead> <tbody> <tr> <td>PH</td> <td>-</td> <td>8.40</td> <td>8.50</td> <td>8.30</td> </tr> </tbody> </table>	Sample date	Std	13/04/2020	05/05/2020	10/06/2020	PH	-	8.40	8.50	8.30	Complied																				
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>The mill processing water are obtained from the SAJ and water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis with the latest recording detailed sampled (water usage per MT in 2020 of fresh fruit bunches (FFB) below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Month</th> <th>Water</th> <th>FFB /mt</th> <th>Water /FFB</th> </tr> </thead> <tbody> <tr><td>1</td><td>Jan</td><td>14182</td><td>16449</td><td>0.86</td></tr> <tr><td>2</td><td>Feb</td><td>17508</td><td>19109</td><td>0.92</td></tr> <tr><td>3</td><td>Mac</td><td>18252</td><td>19790</td><td>0.92</td></tr> <tr><td>4</td><td>Apr</td><td>20068</td><td>24728</td><td>0.81</td></tr> <tr><td>5</td><td>May</td><td>17799</td><td>22157</td><td>0.80</td></tr> <tr><td>6</td><td>June</td><td>20912</td><td>26068</td><td>0.80</td></tr> <tr><td>7</td><td>July</td><td>20686</td><td>23663</td><td>0.87</td></tr> <tr><td>8</td><td>Aug</td><td>21502</td><td>24305</td><td>0.88</td></tr> </tbody> </table>	No	Month	Water	FFB /mt	Water /FFB	1	Jan	14182	16449	0.86	2	Feb	17508	19109	0.92	3	Mac	18252	19790	0.92	4	Apr	20068	24728	0.81	5	May	17799	22157	0.80	6	June	20912	26068	0.80	7	July	20686	23663	0.87	8	Aug	21502	24305	0.88	Complied
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		A slightly higher water usage noted, due to the proportionate reduction in volume of FFB being processed. There were variations of performance. Probable factors are linked to rainy days, significant boiler water rinsing/discharging for maintenance etc.													
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised															
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2020. The document was reviewed/updated on Jan 2020. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:	Complied												
		<table border="1"> <thead> <tr> <th>No</th> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Backhoe tractor/ Machines</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel</td> </tr> <tr> <td>2</td> <td>Van / Supervisory vehicle</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.</td> </tr> </tbody> </table>	No	Target	Objective	Action plan	1	Backhoe tractor/ Machines	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel	2	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.	
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3	Electrical supply	To reduce reliance on gen-sets for power supply	Utilization of TNB sources
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The utilization of fossil fuel in 2020 is being monitored with records shown below:

Site	Sindora Estate 2019/20			REM Estate 2019/20		
Mth	FFB mt	Diesel L	Diesel/FFB	FFB mt	Diesel L	Diesel/FFB
Jan	2943	4640	1.58	1484	6433	4.33
Feb	3541	4900	1.38	1614	6457	4.00
Mac	3476	4980	1.43	1807	6629	3.67
Apr	5457	4220	0.77	2555	6389	2.50
May	5313	5640	1.06	2284	6665	2.92
June	6904	6160	0.89	2685	6681	2.49
July	5564	6084	1.09	2630	6869	2.61
Aug	6244	6036	0.97	2558	6963	2.72
Sept	6828	5970	0.87	2881	6351	2.20

Site	Sg Papan Estate 2019/20			Sindora POM 2019/20		
Mth	FFB mt	Diesel L	Diesel/FFB	FFB mt	Diesel L	Diesel/FFB

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Jan	5373	5281	0.98	16449	16787	1.02
Feb	5052	4771	0.94	19109	14930	0.78
Mac	5292	4940	0.93	19790	14622	0.74
Apr	7029	4483	0.64	24728	9427	0.38
May	6670	4169	0.63	22157	12914	0.58
June	9691	6386	0.66	26068	13740	0.53
July	7436	5181	0.70	23663	14590	0.62
Aug	8728	4385	0.50	24305	15290	0.63
Sept	8997	3427	0.38	24043	17890	0.74

The estates and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running.

Performance variation in view of several factors i.e.

- a) Infrastructure of estates,
- b) Community size / no of gen-sets,
- c) No. of vehicles / age of machine.
- d) Weather interference / crop production volume

There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.

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		<p>A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2020 identified in the following</p> <ul style="list-style-type: none"> a) Environmental Aspect Identification Summary FY 2020 reviewed accordingly. b) Environmental Impact Evaluation Summary FY 2020 reviewed accordingly. <p>Renewable energy usage & diesel consumption 2019/20 was established and monitored by monthly basis. Among others effort to reduce diesel usage includes the following;</p> <ul style="list-style-type: none"> a) By maintenance of the boiler & machinery to ensure at optimum level, b) to monitor diesel usage, c) provide training to workers regarding reduce fuel and diesel usage for boiler. 	
<p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>The Sindora Mill and the 3 Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.</p> <ul style="list-style-type: none"> a) The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment. b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report. 	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</p>	<p>The Sindora Complex has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. The Sindora</p>	Complied

	<p>and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>Complex records NIL new development within the certified area. There is no new planting in all the three estates audited.</p>										
<p>7.10.3</p>	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The Sindora Complex has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. which covers estates and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1167 890 1917 1315"> <thead> <tr> <th data-bbox="1167 890 1205 975"></th> <th data-bbox="1205 890 1435 975">Environmental Receptors</th> <th data-bbox="1435 890 1917 975">Source</th> </tr> </thead> <tbody> <tr> <td data-bbox="1167 975 1205 1139">1</td> <td data-bbox="1205 975 1435 1139">Air</td> <td data-bbox="1435 975 1917 1139">Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).</td> </tr> <tr> <td data-bbox="1167 1139 1205 1315">2</td> <td data-bbox="1205 1139 1435 1315">Water</td> <td data-bbox="1435 1139 1917 1315">Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> </tbody> </table>		Environmental Receptors	Source	1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).	2	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down	<p>Complied</p>
	Environmental Receptors	Source										
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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 -	There was no land preparation of existence or new planting in KMB Estates by burning ever since the management practiced zero burning as per the policy in:	Complied			

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		<p>a) KMB Agricultural Manual A 08 Under felling/clearing & land preparation b) Sustainable Policy</p> <p>KMB has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>There is no fire used in preparation of existence or new planting in KMB Estates. There is a fire ERP team established by all the estates and mill.</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>KMB engaged smallholders on the fire prevention and control measures. This was mentioned in the stakeholder meeting of respective units under item no 4 elaborating the following;</p> <p><i>a. Memelihara dan memulihara kepelbagaian biologi</i> <i>b. Pihak berkepentingan boleh melaporkan kepada KMB</i> <i>c. Jika berlaku kebakaran di persempadanan kawasan ladang/kilang</i> <i>d. Pihak ladang/kilang /pekebun kecil berhampiran juga boleh mendapatkan bantuan daripada KMB jika berlaku di kawasan mereka.</i></p>	Complied
<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>The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest. There was no land clearing activities made nor had damaged any forest to protect or enhance the HCV.</p>	Complied

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	<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>7.12.2</p>	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>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>The latest assessment conducted was in January 2008 reviewed in Feb 2013 for Sindora Complex Supply Base Estates respectively. The assessment was conducted by <i>A.J.F.M Dekker</i>. Exception for Sindora Estate for which the assessment was reviewed in August 2016 by <i>M/s Malaysian Environmental Consultant Sdn Bhd</i>. Sg Papan Estate HCV assessment was made in July 2009. Both the assessments were made in relation to the Rapid Biodiversity Assessment. Both the reports have identified the list of natural habitats that is possible present in the operating units. The reports detail the findings of a rapid appraisal of the biodiversity in the estates and address the RSPO P&C relevant to biodiversity conservation and HCV. Therein being provided details relating to the following;</p> <ul style="list-style-type: none"> a) General biodiversity issues b) Watercourses and drainage c) Habitats natural and man-made d) Wildlife e) Ponds and reservoirs f) Wetlands /watercourses g) Legal aspects h) Immediate and long term effect. <p>In all the estates within the Sindora Complex Supply Base there is HCV habitat within and outside the estates as presented below. There was no primary forest habitats present at any of the estates. There is also no wildlife neither reported nor observed by the employees. The estates within contains pockets of semi-natural vegetation. Other observation as recorded below;</p>	<p>Complied</p>

	Estate	Natural habitat		Water bodies
		Within	At boundary	
1	REM	Tidal mangroves	Tidal Mangrove	4 ponds
2	Sindora	-	Dense, shrubby, degraded swamp forest cutting through estate, strips of young generation forest along northern boundary	1 ponds
3	Sg Papan	Grove around mangrove	Tidal mangrove. Successional mangrove-forest.	1 pond

	Estate	Wildlife species	
		Within	At boundary
1	REM	long tailed macaque Black shouldered kite, crested serpent eagle, King cobra	None

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		<table border="1"> <tr> <td data-bbox="1137 363 1178 523">2</td> <td data-bbox="1178 363 1294 523">Sindora</td> <td data-bbox="1294 363 1601 523">Elephant, malaysian tapir, sun bear, pig tailed macaque,</td> <td data-bbox="1601 363 1899 523">Elephant, malaysian tapir,</td> </tr> <tr> <td data-bbox="1137 523 1178 639">3</td> <td data-bbox="1178 523 1294 639">Sg Papan</td> <td data-bbox="1294 523 1601 639">None</td> <td data-bbox="1601 523 1899 639">malaysian tapir, spectacled langur, silvered leaf monkey.</td> </tr> </table> <p>The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest Hence the current HCV assessment of the estates remains valid.</p> <p>The recent HCV assessment methodology is through site observation, interviews, stakeholders consultation and desktop review on available secondary data. The assessment among others covers the following areas;</p> <ul style="list-style-type: none"> a) Overview of HCV assessment. b) Description of assessment areas. c) Finding and discussion <ul style="list-style-type: none"> - landscape context - HCV criteria and application to agriculture d) HCV monitoring and management <p>In summary the areas covered within the all Sindora Estates landholdings the HCV areas presence as summarized in 7.12.2 above.</p>	2	Sindora	Elephant, malaysian tapir, sun bear, pig tailed macaque,	Elephant, malaysian tapir,	3	Sg Papan	None	malaysian tapir, spectacled langur, silvered leaf monkey.	
2	Sindora	Elephant, malaysian tapir, sun bear, pig tailed macaque,	Elephant, malaysian tapir,								
3	Sg Papan	None	malaysian tapir, spectacled langur, silvered leaf monkey.								
7.12.3	<i>Indicator is not applicable in Malaysia context</i>		Not Applicable								

<p>7.12.4</p>	<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). - Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in all Sindora estates (refer 7.3.1 to 7.4.2). The recent HCV assessment methodology is through site observation, interviews, stakeholders consultation and desktop review on available secondary data. The assessment among others covers the following areas; e) Overview of HCV assessment. f) Description of assessment areas. g) Finding and discussion - landscape context - HCV criteria and application to agriculture h) HCV monitoring and management</p> <p>In summary the areas covered within the Sindora estates landholdings the HCV areas presence as summarized in 7.12.2 above. Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PI/GM and also personnel from the SQD unit. Sighting of RTE are made and recorded during the AP rounds in the estates if any. Highlights if any are discussed during the management review or management meetings subject to the urgency of the situation.</p>	<p>Complied</p>
<p>7.12.5</p>	<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. - Minor compliance -</p>	<p>There was no rights of local communities been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas. The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird, presence of wild boar and monkeys occasionally sighted. The appropriate measures that are expected to maintain</p>	<p>Complied</p>

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		and/or enhance them were implemented through an action plan reviewed in Jan 2020.	
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in the audited estates (refer 7.3.1 to 7.4.2).	Complied
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 2 estates (refer 7.3.1 to 7.4.2). Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PI/GM and also personnel from the SQD Unit. Sighting of RTE are made and recorded during the AP rounds in the estates if any.	Complied
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -	The audit findings have confirmed that there is no new land clearing affecting areas of HCVs, HCS forests peatland and other conservation areas.	Complied

Appendix B: Approved Time Bound Plan

Time Bound Plan for 100% Own Certified FFB

Project	Estate	Plan
Indonesia	PT RAJ	2023
	PT TPR	

List of Estate Manage by KULIM			
Mill Base	Kulim/ Jcorp Estate	Estate	Status
Tereh Mill	Kulim Estate	Tereh Utara	Certified RSPO in Jan 2009
		Tereh Selatan	
		Selai	
		Enggang	
		Mutiara	
		Sg. Sembrong	
		Sg. Tawing	
Sedenak Mill		Sedenak	
		Rengam	
		Basir Ismail	
		Ulu Tiram	
Sindora Mill		Kuala Kabong	
		Rem / Pasak	
		Sindora	
Palong Mill		Sungai Papan	
		Sepang Loi	
		Umac	
		Labis Bahru	
		Mungka	
		Kemedak	
	Palong		
Pasir Panjang Mill	Kulim Estate	Pasir Panjang	Certified RSPO in March 2017
		Siang	
	Jcorp Estate	Bukit Kelompok	
		Tunjuk Laut	
		Pasir Logok	
	Bukit Payung		
-	Kulim Estate	Bukit Layang Estate	Certified RSPO in April 2020
-	Trader	Eng Lee Heng	Certified RSPO in May 2020 under Wild Asia Group Scheme

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **2019** for **Sindora Palm Oil Mill** 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 **Sindora Palm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.45
PKO	0.00

Extraction	%
OER	21.49
KER	5.07

Production	t/yr
FFB Process	247,223.51
CPO Produced	53130.37
PKO Produced	12533.27

Land Use	Ha
OP Planted Area	19832.51
OP Planted on peat	1366.44
Conservation (forested)	1.59
Conservation (non-forested)	114.56
Total	21,198.95

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	77,792.76	0.57	415.39	0.50	45824.02	0.00	124032.17	1.07
CO ₂ Emission from fertilizer	8,090.16	0.06	37.86	0.05	3299.98	0.00	11428.00	0.11
NO ₂ Emission	5,758.29	0.04	60.09	0.07	2495.72	3.00	8316.11	3.11
Fuel Consumption	1,035.18	0.01	4.62	0.01	547.01	0.00	1586.81	0.02
Peat Oxidation	0.00	0.00	257.92	0.31	0.00	0.00	257.92	0.00
Sink								
Crop Sequestration	-73,358.01	-0.54	-393.73	-0.47	-36210.77	0.00	-109962.52	-1.01
Conservation Sequestration	-14.45	-0.00	0.00	0.00	0.00	0.00	-14.45	0.00
Total	19303.94	0.14	384.15	0.46	22532.21	0.00	42220.30	0.60

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**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	57333.94	0.23
Fuel Consumption	479.17	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	-4505.97	-0.02
Sales of EFB	0.00	0.00
Total	53307.14	0.21

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	4.00
Divert to anaerobic diversion (%)	96.00

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100.00
Divert to methane captured (flaring) (%)	0.00
Divert to methane captured (energy generation) (%)	0.00

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	13,956.85	9,394.00	23,350.85
2	Nov 2019	12,135.60	7,710.57	19,846.17
3	Dec 2019	11,336.27	7,978.85	19,315.12
4	Jan 2020	9,801.53	6,647.83	16,449.36
5	Feb 2020	10,209.71	8,899.71	19,109.42
6	Mar 2020	10,575.89	9,214.71	19,790.6
7	Apr 2020	15,042.63	9,686.09	24,728.72
8	Mei 2020	14,268.13	7,888.65	22,156.78
9	Jun 2020	21,266.91	4,801.15	26,068.06
10	July 2020	17,305.19	6,358.62	23,663.81
11	Aug 2020	19,237.71	5,067.44	24,305.15
12	Sept 2020	18,928.66	5,114.73	24,043.39
	Total	174,065.08	88,762.35	262,827.43

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Oct 2019	2,995.49	640.91
2	Nov 2019	2,587.14	596.21
3	Dec 2019	2,295.16	521.32
4	Jan 2020	2,082.25	521.98
5	Feb 2020	2,166.29	557.40
6	Mar 2020	2,257.25	511.26
7	Apr 2020	3,241.68	729.91
8	Mei 2020	2,971.94	676.75
9	Jun 2020	4,293.77	1,050.07
10	July 2020	3,477.96	883.73
11	Aug 2020	4,039.89	978.70
12	Sept 2020	3,813.55	1,032.08

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	Total	36,222.37	8,700.32
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C. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	XX	TR-b3e71273-76a1	332.75	0
2	XX	TR-3919f235-9a13	69.9	0
3	XX	TR-e8e8300f-5160	194.83	0
4	XX	TR-6490b378-3be5	181.7	0
5	XX	TR-1f2a2794-370c	69.83	0
6	XX	TR-d1cd0d1d-19eb	0	354.32
7	XX	TR-b0c0fd0f-f9f3	0	353.19
8	XX	TR-96255a9e-033b	0	225.48
9	XX	TR-906dd948-36eb	0	375.23
Total			849.01	1,308.22

D. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	XX	ISCC	792.55	0
2	XX	ISCC	197.93	0
3	XX	ISCC	83.67	0
4	XX	ISCC	363.11	0
Total			1,437.26	0

E. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	XX	2,202.94	640.91
2	XX	2,389.21	596.21
3	XX	1,515.92	521.32
4	XX	1,690.19	449.07
5	XX	2,156.81	568.55

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6	xx	1,945.53	428.51
7	xx	3,260.90	752.49
8	xx	2,291.32	642.64
9	xx	4,714.20	1,073.31
10	xx	3,485.47	595.06
11	xx	3,569.51	491.67
12	xx	4,380.87	503.44
	Total	33,602.87	7,263.18

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)
N/A			

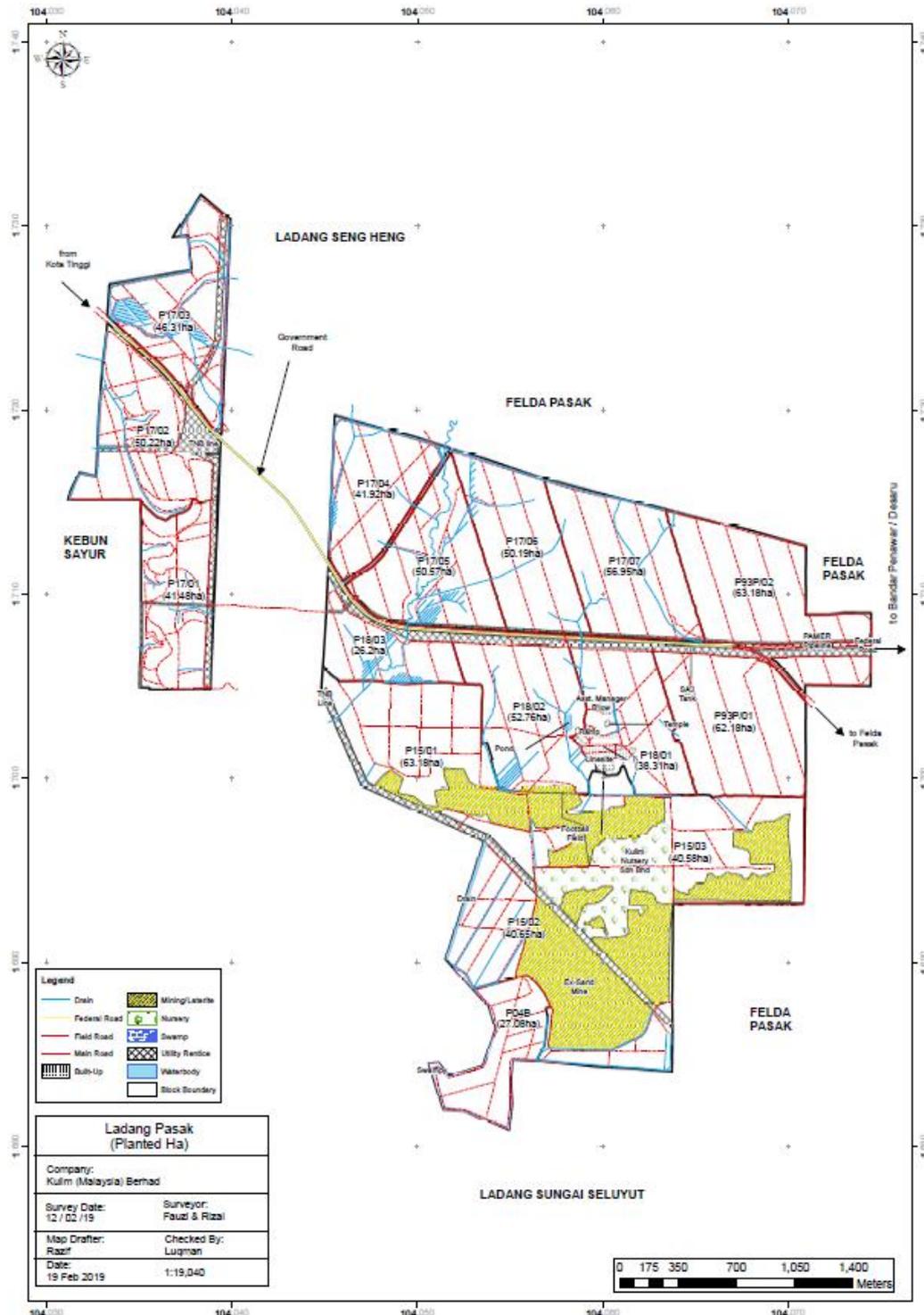
Appendix E: Location Map of Certification Unit and Supply bases

Sindora POM

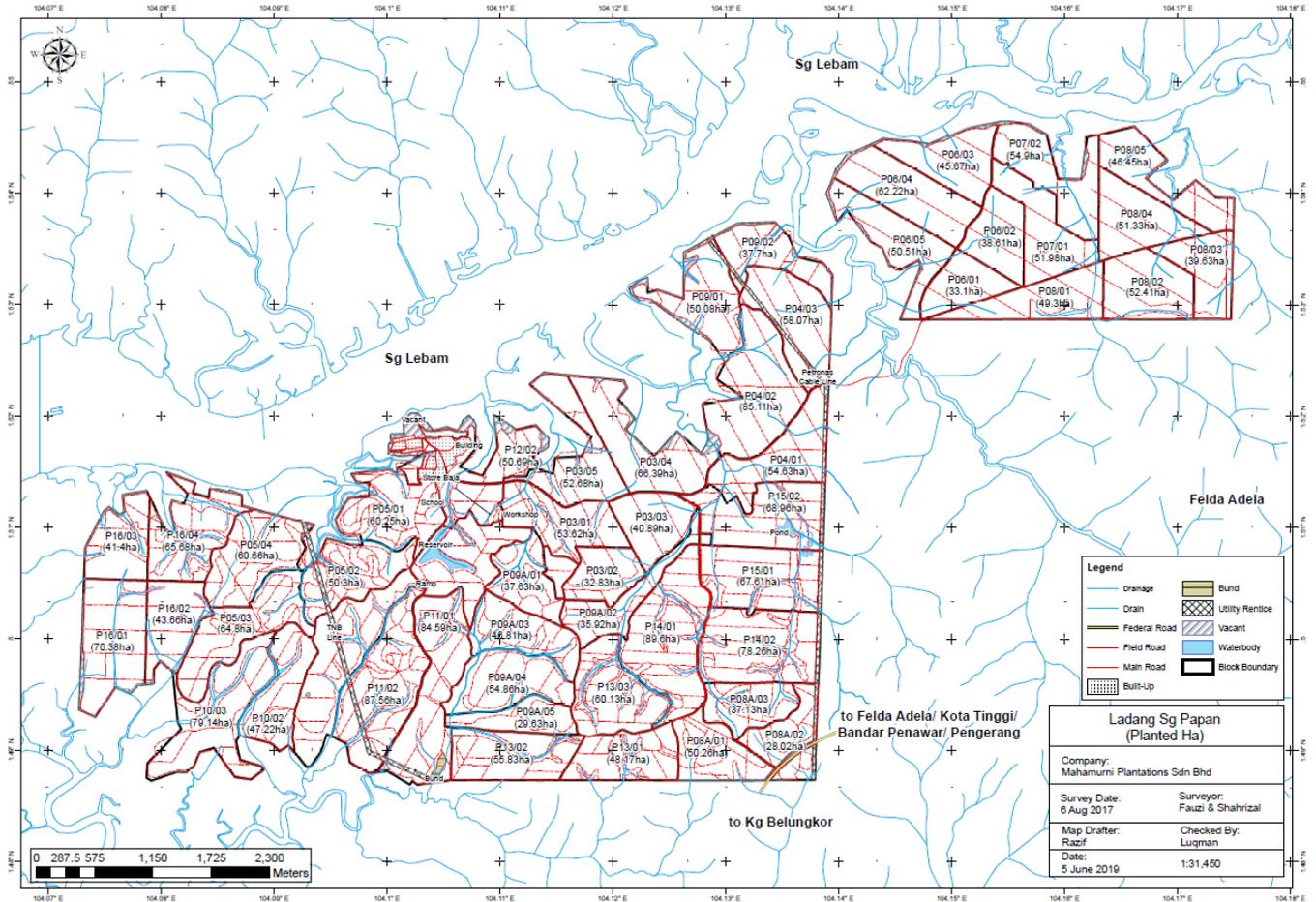


Appendix F: Estate Field Map

REM Estate's Map



Sungai Papan Estate's Map



Appendix G: List of Smallholder Sampled

Not Applicable.

Appendix H: List of Abbreviations

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