

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

Client Company name (Parent Company): Sime Darby Plantation Berhad
Client company Address: Level 3A, Main Block, Plantation Tower No 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 10) Bukit Puteri Palm Oil Mill
Location of Certification Unit: Sg. Koyan, 27650 Raub, Pahang, Malaysia.
Date of Final Report: 27/8/2021

TABLE of CONTENTS

Page No

Section 1: Scope of the Assessment.....	3
1. Company Details	3
2. Certification Information	3
3. Other Certifications.....	4
4. Location(s) of Mill & Supply Bases	4
5. Description of Supply Base	4
6. Plantings & Cycle.....	4
7. Summary of Certified Tonnage of FFB (Own Certified Scope)	4
8. Summary of Certified Tonnage of FFB (from other certified unit(s))	5
9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate).....	5
10. Summary of Certified Tonnage (not applicable for ISS)	6
11. Summary of Actual Volume sold	6
12. Independent Smallholders Certified Tonnage / Volume – not applicable.....	8
13. Independent Smallholders Actual Sold Tonnage / Volume – not applicable.....	8
Section 2: Assessment Process	9
2.1 Assessment Methodology, Programme, Site Visits.....	9
2.2 BSI Assessment Team	10
1.3 Assessment Plan.....	12
Section 3: Assessment Findings	15
3.1 Multiple Management Units and Time Bound Plan.....	15
3.2 Progress of scheme smallholders and/or outgrowers.....	18
3.3 Details of Nonconformities	27
3.3.1 Status of Nonconformities Previously Identified and Observations.....	35
3.3.2 Summary of the Nonconformities and Status	36
3.4 Stakeholders and previous land owner / user consultation.....	37
3.5 Impartiality and conflict of interest	39
Formal Signing-off of Assessment Conclusion and Recommendation	40
Appendix A: Summary of Findings	41
Appendix B: GHG Reporting Executive Summary	130
Appendix C: Location Map of Certification Unit and Supply bases.....	132
Appendix D: Estate Field Map.....	133
Appendix E: List of Smallholder Registered and sampled.....	134
Appendix F: List of Abbreviations	135

Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Sime Darby Plantation Berhad		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	07/09/2004
Address	Level 3A, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 10) - Bukit Puteri Palm Oil Mill		
Location / Address	Sg. Koyan, 27650 Raub, Pahang, Malaysia.		
Website	www.simedarbyplantation.com		
Management Representative	Shylaja Devi Vasudevan Nair	E-mail	shylaja.vasudevan@simedarbyplantation.com
Telephone	+(603) 78484379	Facsimile	-

2. Certification Information			
Certificate Number	RSPO 745403	Certificate Start Date	07/07/2021
Date of First Certification	07/07/2011	Certificate Expiry Date	06/07/2026
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	The objective of the assessment was to conduct a recertification assessment of the existing certification to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by the organisation's management system.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 2) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" 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		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	20 tonne/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 745404	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services (M) Sdn Bhd	26/11/2022
MSPO 745405	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 3	BSI Services (M) Sdn Bhd	26/11/2022
MSPO 745406	MSPO Supply Chain Certification 2018	BSI Services (M) Sdn Bhd	24/10/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Bukit Puteri Palm Oil Mill	KKS Bukit Puteri, Sg. Koyan, 27650, Raub, Pahang Darul Makmur	4° 12' 8.71" N	101° 51' 47.24" E
Bukit Puteri Estate	Sungai Koyan, 27650, Raub, Pahang Darul Makmur	4° 11' 40.96" N	101° 53' 22.20" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)			<input type="checkbox"/> Yes (please refer to Principle 7 for details)	
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Puteri Estate	3,795.58	21.36	58.86	3,875.80	97.9
Total	3,795.58	21.36	58.86	3,875.80	97.9

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bukit Puteri Estate	378.72	2,084.21	292.34	1,040.31	-	3,416.86	378.72
Total (ha)	378.72	2,084.21	292.34	1,040.31	-	3,416.86	378.72

7. Summary of Certified Tonnage of FFB (Own Certified Scope)			
Estate / Smallholders	Tonnage / year		
	Estimated last year	Actual	Forecast

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<i>(July 20 – June 21)</i>	<i>(September 2020 – March 2021)</i>		<i>(July 2021 – June 2022)</i>
		<i>Previous license period (N/A)</i>	<i>Current license period (Sep2020 -March 2021)</i>	
Bukit Puteri Estate	53,000	-	26,382.36	50,000
Total	53,000	26,382.36		50,000

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year <i>(July 20 – June 21)</i>	Actual <i>(September 2020 – March 2021)</i>		Forecast <i>(July 2021 – June 2022)</i>
		<i>Previous license period (N/A)</i>	<i>Current license period (Sep2020 -March 2021)</i>	
Kerdau Estate		-	87.76	
Sg Mai Estate		-	264.38	
Total		352.14		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year <i>(July 20 – June 21)</i>	Actual <i>(September 2020 – March 2021)</i>		Forecast <i>(July 2021 – June 2022)</i>
		<i>Previous license period (N/A)</i>	<i>Current license period (Sep2020 -March 2021)</i>	
3 rd party FFB suppliers	N/A	-	10,257.57	N/A
Total		10,257.57		

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Sept 2020	5,195.71	2,552.27	7,747.98
2	Oct 2020	4,824.63	2,141.56	6,966.19
3	Nov 2020	3,673.36	1,457.29	5,130.65
4	Dec 2020	3,390.18	1,211.73	4,601.91
5	Jan 21	2,868.90	909.66	3,778.56

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

6	Feb 21	2,648.07	833.99	3,482.06
7	Mar 21	4,133.65	1,151.07	5,284.72
TOTAL		26,734.5	10,257.57	36,992.07

10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year (July 20 – June 21)	Actual* (September 2020 – March 2021)		Forecast (July 2021 – June 2022)
FFB	FFB		FFB
	<i>Previous license period (N/A)</i>	<i>Current license period (Sep2020 - March 2021)</i>	
53,000	0	26,734.45	50,000
CPO (OER: 20.5 %)	CPO (OER: 20.97 %)		CPO (OER: 21 %)
15,565	0	5,607.01	10,500
PK (KER: 4.75 %)	PK (KER: 4.54 %)		PK (KER: 4.9 %)
3,571	0	1,214.57	2,450

Note*: The period reported less than 12months because previous assessment (ASA1_4) was conducted in Sep 2020.

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Sept 2020	1,116.56	220.86
2	Oct 2020	1,052.25	220.99
3	Nov 2020	777.65	157.83
4	Dec 2020	690.58	159.82
5	Jan 21	567.18	135.68
6	Feb 21	546.30	135.61
7	Mar 21	856.49	183.78
TOTAL		5,607.01	1,214.57

11. Summary of Actual Volume sold					
Current License period (September 2020 – March 2021)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	157.85	-	-	5,441.98	5,599.83
PK (MT)	-	-	-	1,121.74	1,121.74
Credits	-	-	-	-	-

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Previous License period (<i>nil</i>)					
CPO (MT)	-	-	-	-	-
PK (MT)	-	-	-	-	-
Credits	-	-	-	-	-

Note: Conventional is RSPO certified material but sold as non-RSPO.

11A. 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	XYZ	TR-d101fbb6-2b9d, TR-9d4b9eb0-406c	157.85	-
TOTAL			157.85	

Note:

11B. 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)
	Nil			
TOTAL				

Note:

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	A	5,441.98	-
2	B	-	1,121.74
TOTAL		5,441.98	1,121.74

Note:

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	Nil		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

			TOTAL
Note:			

12. Independent Smallholders Certified Tonnage / Volume – not applicable									
Phase	Estimated last year (key in period)			Actual (key in period)			Forecast (key in period)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB									
IS-CSPO									
IS-CSPKO									
IS-CSPKE									

13. Independent Smallholders Actual Sold Tonnage / Volume – not applicable						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period (key in period)						
Credits						
Physical						

Section 2: Assessment Process

Certification Body:

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

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI 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 **12 & 14-16/4/2021**. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on **3/3/2021** via BSI's global stakeholder notification invitation link;

<https://www.bsigroup.com/globalassets/localfiles/en-my/rspo/Public%20Notification/2021/03-04-rspo-public-notification-recertification-sou-10-sime-darby-bukit-puteri-pom--supply-base-english.pdf>

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.

Due to the COVID-19 pandemic and travel restriction imposed by the government under Movement Control Order (MCO) 3.0, the Critical NC close out assessment was conducted on **8/7/21** by using remote/ICT platform. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula $(\sqrt{y}) \times (z)$; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

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 3.4.

The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer 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 (Re-Certification)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Bukit Puteri POM	√	√	√	√	√
Bukit Puteri Estate	√	√	√	√	√

Tentative Date of Next Visit: April 4, 2022 - April 6, 2022

Total Number of Mandays: 9 man days

2.2 BSI Assessment Team

Name	Role	Competency
Mohamed Hidir Zainal Abidin	Team Leader	<p>Education: Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006.</p> <p>Work Experience: 10 years working and auditing experience in palm oil industry specifically on palm oil milling for 5 years.</p> <p>Training attended: ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO P&C and SCCS. Completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015</p> <p>Aspect covered in this audit: Estate and mill best practice, legal and other requirements, Environmental and biodiversity, waste management and RSPO SCCS.</p> <p>Language proficiency: English and Bahasa Malaysia</p>
Hu Ning Shing	Team Member	<p>Education: Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011.</p> <p>Work Experience: 5 years working experience in rubber and palm oil industry</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>Training attended: 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</p> <p>Aspect covered in this audit: Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue.</p> <p>Language proficiency: Bahasa Malaysia and English languages</p>
<p>Muhamad Fadzli</p>	<p>Team Member</p>	<p>Education: Bachelor of Forestry Science from University Putra Malaysia</p> <p>Work Experience: Started the career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations and had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans.</p> <p>Training attended: Completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018</p> <p>Aspect covered in this audit: Mill & Estate Best Practices, Legal, OSH and Worker's Consultation.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English Language.</p>
<p>Dr Suhaili Sahari</p>	<p>Peer Reviewer</p>	<p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p> <p>Work Experience: Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategize the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1. ISO 9001:2015 Lead Auditor and Internal Auditor 2. TS16949 3. Safety 4. ISO 14001:2015 Standard 5. RSPO Standards: RSPO P&C 2018 MY-NI 2019

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		6. MSPO Standards : MS 2530 : 2013 part 1, 2 , 3 and 4 7. Problem Solving Technique : 8 D, ICC, QCC, Systematic PS 8. HACCP MS 1480:2019 9. GAP Standard : Global GAP, Euru GAP
--	--	--

Accompanying Persons:

Name	Role
Nicholas Cheong	Qualifying reviewer

2.3 Assessment Plan

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

Date	Time	Subjects	MH	HNS	MF	NC
Sunday 11/4/2021	PM	Audit team travel to Kuala Lipis. Check in at Starwell Hotel	√	√	√	√
Monday 12/4/2021 Bkt Puteri POM	0730	Audit team travel to Bukit Puteri POM	√	√	√	√
	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 				√
	0830 - 1200	Bkt Puteri POM 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.	√	√	√	√
	1200 - 1300	Lunch	√	√	√	√
	1300 - 1630	Bkt Puteri POM 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 13/4/2021	AM - PM	1 st Ramadhan (Public Holiday)				

Wednesday 14/4/2021 Bukit Puteri POM and Estate	0730	Audit team travel to Bukit Puteri POM	√	√	√	√
	0900 - 1200	Continue with unfinished elements from day 1				√
	1000 - 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-	-
	1300 - 1400	Lunch break	√	√	√	√
	1300 - 1630	Bukit Puteri Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√	√
1630 - 1700	Interim Closing Briefing	√	√	√	√	
Thursday 15/4/21 Bukit Puteri Estate	0730	Travel to Bukit Puteri Estate	√	√	√	√
	0900 - 1200	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.				
	1300 - 1400	Lunch	√	√	√	√
	1400 - 1630	Continue with unfinished elements/pre-lunch activities	√	√	√	√
	1630 - 1730	Interim closing	√	√	√	√
Friday 16/4/2021 Bukit Puteri POM	0730	Travel to Bukit Puteri POM				
	0830 – 1130	RSPO Supply chain requirements for mill - Mass Balance Module - Internal Audit - Outsourcing activities - Purchasing and Goods In - Sales and Goods Out - Outsourcing Activities - Record keeping - Extraction Rate - Processing - Registration of transaction - Claims	√	-	-	-
	1130 – 1230	Closing meeting and presentation of finding	√	√	√	√

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Major NC close out verification

PRELIMINARY AGENDA		
Time	Subjects	Mohd Hidhir
09.00 – 09.15	Opening Meeting via MS team <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Briefing on remote verification plan 	√
09.15 – 10.30	Bukit Puteri POM – Verification on previous Major NC. Site observation, workers interview (individual and group session) if necessary Document review – implemented evidence	√
10.30 – 11.30	Bukit Puteri Estate – Verification on previous Major NC. Site observation ,workers interview (individual and group session) if necessary Document review – implemented evidence	√
11.30 – 12.00	Closing meeting	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	<p>Yes. SDP TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</p>	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	<p>Yes. All estates and mill has been certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 1st Oct 2018, the mill has completed the selling off transaction.</p> <p>In Indonesia, PT Mitral Austral Sejahtera was sold and currently SDP have no control in the management.</p>	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	No. There is no new acquisitions as at latest TBP 2020.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	<p>Yes.</p> <p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification.</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>PT Mitral Austral Sejahtera: The properties was sold and currently SDP have no control in the management. The property was disposed on 25 June 2019 and an official letter on disposal of PT Mas was sent to RSPO Secretariat on 27 June 2019. Last meeting with all relevant stakeholders was done with RSPO CP during recent RT in Bangkok last November 2019.Both parties have responded to the legal reviewer report and submitted the comment to RSPO CP.</p> <p>Malaysia - Pekaka Mill is being mothballed (at the time of SDP Annual Report 2018) and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang. Bintang Oil Mill: SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 1st Oct 2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public notification letter: https://www.rspo.org/certification/public-announcement</p> <p>For Liberia operations: As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</p> <p>ACOP 2019 has been cross-referenced as below: https://www.rspo.org/members/29/Sime-Darby-Plantation-Berhad</p>	
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>No lapses.</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat	
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	HCV assessment has been conducted for uncertified units i.e. PT Mas (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new plantings. As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations	Complied
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 4.4, 4.5, 4.6, 4.7 and 4.8.	No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above. This is further check in the website: https://www.rspo.org/certification/remediation-and-compensation/racp-tracker . Management units with potential liability is 17 and a total of 15 management units has submitted the LUCA to RSPO.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No stakeholder comments or complaints received.	Complied
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	There is no legal non-compliance found in other uncertified management unit reported	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes. The sustainability unit has conducted the internal audit for 9 units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1 st 2010. Other than that, land conflicts and land disputes also being audited and approved by Head of	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	Sustainability-Indonesia (Alagendran Maniam) on 22/05/2019. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance.	
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No any critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	No stakeholder comments or complaints received.	Complied

3.2 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	Choose an item.

Approved Time Bound Plan

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

Financial year (July – June)	Targeted	Achieved/Status	Attachments
Jun-08	5 SOUs	<p>Achievement of Timebound Plan Sime Darby Plantation has had all its SOUs (Malaysian & Indonesian) completing the RSPO Main Assessment by end Dec 2011 in accordance to the initial timebound plan. As at Dec 2011, all Malaysian SOUs have been RSPO certified (with the exception of 2 new oil mills commissioned to replace the current oil mills after the initial timebound plan targets).</p> <p>97% of Sime Darby Plantation's upstream operations is RSPO certified, one SOU - PT MAS pending certification in Indonesia due to some social disputes. Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter.</p> <p>Note: Time-bound plan to achieve 100% RSPO certification has shifted to 2015 .</p>	<p>For details please refer to Attachments:</p> <ul style="list-style-type: none"> i) SDP - RSPO Certification Status for Malaysia Operations ii) SDP- RSPO Certification Status for Indonesia Operations iia) Updates on PT MAS iii) RSPO SCCS status for Sime Darby Plantation (Downstream Operations)
2008/2009	20 SOUs (from Malaysia and Indonesia)		
2009/2010	20 SOUs (from Malaysia and Indonesia)		
2010/2011 (End Dec 2011)	17 SOUs (from Malaysia and Indonesia)		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Table 2: Details of RSPO Certification Status

Status	Malaysia	Indonesia	Liberia	Total	Remarks
RSPO Certified	33	23	0	56	<p>Malaysia * Effectively 33 Mills (Excluding Bintang Oil Mill) - Note: Sg Samak and Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down, and Pekaka POM is being mothballed.</p> <p>*SDP acquired Bintang Palm Oil Mill, Talisman Estate, and Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bk Paloh Estate of SOU 21 Gunung Mas, while Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut. Lian Seng will be incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018, whilst Talisman Estate has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2017. For Bintang Oil Mill, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold as at Dec 2017.</p> <p>Indonesia *Effectively 23 Mills *Note: <i>Angsana Mini POM closed down in 2016. Selabak POM is being mothballed.</i></p>
Planned for Certification / Undergoing Stage 1 or Stage 2 Assessment/ RSPO EB Review	0	1	1	2	<p>SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.</p> <p>Indonesia PT Mitral Austral Sejahtera: The properties was sold and currently SDP have no control in the management. The property was disposed on 25 June 2019 and an official letter on disposal of PT Mas was sent to RSPO Secretariat on 27 June 2019. Last meeting with all relevant stakeholders was done with RSPO CP during recent RT in Bangkok last November 2019.Both parties have responded to the legal reviewer report and submitted the comment to RSPO CP.</p> <p>As at Dec 2017, a total of 28,712 Ha of smallholders have been certified. The entire KKPA (1-5) in Sebanban, KKPA Sg. Cengal, and Plasma TGK and SIA (East and West Plasma) are now RSPO certified with a production capacity of 465,602 mt of FFB. Total scheme smallholders hectares are 51,353 and total communities are 22,613.</p> <p>Certification process for the remaining associated smallholders areas is on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and outgrowers by end 2020.</p> <p>Liberia</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

					As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations
Total SOUs	33	24	1	58	Other remarks: In March 2015, Sime Darby Plantation completed the acquisition of New Britain Palm Oil Limited (NBPOL). NBPOL is managed under a separate entity and the reporting of timebound plan will be under NBPOL's management. NBPOL is considered as a different entity/member under the RSPO and NBPOL is 100% RSPO Certified.

SDP - RSPO Certification Status for Malaysia Operations

SOU No.	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '11	11-Aug-20	SPO 550179	
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4-Oct-21	CU-RSPO-815148, RSPO 590800	
3	Elphil	Sg Siput, Perak	18 Jun '11	17-Jun-21	RSPO 550180	
4	Flemington	Teluk Intan, Perak	5 Oct '11	4-Oct-21	CU-RSPO-819144, RSPO 590802	
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-811218, RSPO 0015	
5	Selaba	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-819142, RSPO 0016	
5a	Sg Samak	Teluk Intan, Perak	3 Mar '11	NA	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2-Mar-21	CU-RSPO-819143, RSPO 0014	
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14-Apr-21	RSPO 550181	
8	East	Carey Island, Selangor	19 May '10	18-May-20	SPO 543543	

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

9	West	Carey Island, Selangor	19 May '10	18-May-20	SPO 543594	
9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
10	Bukit Puteri	Raub, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-815147, 18502206 001, 824 502 14020	
11	Kerdau	Temerloh, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819155, 18502207 001, 824 502 14019	
12	Jabor	Kuantan, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819156, RSPO 928288, 824 502 16049	
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29-Dec-21	CU-RSPO-819163, SGRSPO/PM/MY13/01284, 824 502 16039, SGS-RSPO/PC17-00004, CURSPO-855480	
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18-May-20	SPO 541905	
15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17-Feb-24	SGS-RSPOPM-MY14/01364, 824 502 16032	Sua Betong Oil Mill has been commissioned to replace Rantau Oil Mill with Certificate No: CU-RSPO-819165, certification date: 30 Dec 2011.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '11	6-Jul-21	CU-RSPO-819157, RSPO 928188, 824 502 16051	
17	Kempas	Jasin, Melaka	20 May '15	19-May-20	RSPO-PC 00101	
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4-Oct-21	CU-RSPO-819146, RSPO 591224	
19	Pagoh	Muar, Johor	28/1/2014	27-Jan-24	RSPO 600305	Pagoh Oil Mill has been commissioned to replace Nordanal Oil Mill with Certificate

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

						No: SPO 549297, certification date: 7 Jan 2011.
19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-20	RSPO 548299	
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-20	RSPO 901888	
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	
23	Ulu Remis	Layang-layang, Johor	11 Apr '11	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042	
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	SGS-RSPO/PM-00715, 824 502 16040, BVC-RSPO20170623-01	
25	Segaliud	Sandakan, Sabah	20 May '10	19-May-15	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30-Sep-23	RSPO 537872	
27	Melalap	Tenom, Sabah	21 Jan '11	20-Jan-21	RSPO 547124	
28	Binuang	Kunak, Sabah	16 Jan '09	12-Jul-20	RSPO 001	
29	Giram	Kunak Sabah	16 Jan '09	12-Jul-20	RSPO 002	
30	Merotai	Tawau, Sabah	16 Jan '09	12-Jul-20	RSPO 004	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

31	Lavang	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819166, MUTU-RSPO/053	
32	Rajawali	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819167, RSPO 0020	
33	Derawan	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819169, RSPO 0019	
34	Pekaka	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-815150, MUTU-RSPO/054	Mill is mothballed, supply base merged into Lavang effective Dec 2017.

Legends

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

SDP- RSPO Certification Status for Indonesia Operations

NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanah Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	15-Jan-22	MUTU-RSPO/011, SGS-RSPO/PC17-00005, SGS-RSPO/PC17-00005	
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6-Jul-11	6-Jul-16	MUTU-RSPO/006b	Mill closed down
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3-Jul-13	2-Jul-23	MUTU-RSPO/027	
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	8-Nov-21	MUTU-RSPO/006a	
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	3-Aug-22	MUTU-RSPO/014	Recertification of Bebunga POM is in progress.

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

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

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU-RSPO/088	
23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	2-May-23	MUTU-RSPO/026	
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	2-Jul-24	MUTU-RSPO/044	
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab.Sanggau, Kalimantan Barat	NA	NA	NA	PT Mitral Austral Sejahtera: The properties was sold and currently SDP have no control in the management. The property was disposed on 25 June 2019 and an official letter on disposal of PT Mas was sent to RSPO Secretariat on 27 June 2019. Last meeting with all relevant stakeholders was done with RSPO CP during recent RT in Bangkok last November 2019.Both parties have responded to the legal reviewer report and submitted the comment to RSPO CP.

Legends

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

3.3 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 5 Critical; 4 Minor nonconformities and 2 Opportunity For Improvement raised. The SOU 10 Bukit Puteri POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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 #	2045335-202104-M1	Date Issued	16/4/2021
Due Date	15/7/2021	Date of nonconformity Closure	15/7/2021
Clause & Category (Critical / Minor)	7.8.2 (Critical/Major)		
Statement of Nonconformity:	Riparian buffer zone was not effectively maintained.		
Requirement Reference:	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.		
Objective Evidence:	Observed during site visit at P14C and P09B; The final row of OP was marked/demarcated at buffer/riparian zone area. Evidence of spray was sighted at the said area during visit. The last round of spraying was done on March 2021.		
Corrections:	i) Warning letter was issued to the Mandore and sprayers on 16/04/2021. ii) To remove the contaminated soil and plant the bare area with mucuna or vetiver grass to recover those areas that were sprayed.		
Root Cause Analysis:	i) HCV training is confine to management team and AP only without the inclusion of worker for HCV area. ii) Biodiversity management plan is not effective as the management has appointed a new person in-charge for managing the management plan with effect from January 2021		
Corrective Actions:	i) To arrange for HCV training to all the workers and to create awareness in the protection of sensitive area such as river reserve. To revise training matrix with an inclusion of sprayer and manure for HCV training. ii) To clearly demarcated the area with signage of 'No Spraying' and marking of the last row of OP tree of the area permissible to be sprayed. iii) Appointment of person of in-charge and to brief PIC on the role and responsibility for biodiversity management		
Assessment Conclusion:	Remote Major NC close out verification:		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>i) Warning letter to mandore and sprayers was verified dated 16/4/21. This is as part of disciplinary action and reminder to the specific gang.</p> <p>ii) Based photographic evidence submitted, the affected areas is now grown with mucuna and yet to be planted with vetiver grass.</p> <p>iii) Evidence of training sighted for sprayer geng dated 16/4/21 by the estate's senior assistant. Interview with the mandore via phone call has confirmed the understanding of HCV area and riparian buffer zone protection. Annual training matrix has been revised an including the required training for spraying and manuring group.</p> <p>iv) Based on photographic evidence, clearly demarcation of the area with signage of 'No Spraying' and marking of the last row of OP tree of the area permissible to be sprayed was clearly evident at the previous affected area.</p> <p>v) PIC appointment for biodiversity management was verified. Training/coaching sessions by RSQM was carried out on 28/4/21 (peat and river management) and 5/5/21 (HCV management and data integration) for estate person in charge.</p> <p>The implementation of action plan found to be sufficient to effectively close the major NC on 15/7/21. Continuous implementation will be further verified in the next assessment.</p>
--	---

Non-conformity			
NCR Ref #	2045335-202104-M2	Date Issued	16/4/2021
Due Date	15/7/2021	Date of nonconformity Closure	15/7/2021
Clause & Category (Critical / Minor)	7.10.3 (critical/major)		
Statement of Nonconformity:	Identification of significant pollutants are not thoroughly identified and monitored.		
Requirement Reference:	Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.		
Objective Evidence:	<p>Based on document review for (EIA and EIE) and site observation;</p> <p>i) Operation of steam boiler (EIA/2012/008-01) - Legal reference for air contaminant (particulate/soot/smoke) was not identified. Evaluation of EIA under (EIE/2011/208-2) reported as not significant.</p> <p>ii) EFB dumping activity was not risk assessed and documented under EIA. Evaluation of EIA available and reported in EIE/2012/0031-021. Weightage was reported not significant for normal, abnormal and emergency situation with no legal reference to the said activity. Emergency situation under fire, over dumping (abnormal) with leachate generation was not identified.</p> <p>iii) Desludging activity and tertiary treatment plant EIA/EIE was not made available.</p>		
Corrections:	To revised EIA and EIE for steam boiler operation and EFB dumping and conduct assessment on the impact and aspect on environment for desludging activity and tertiary treatment plant		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Root Cause Analysis:	<p>i) The management is not train to effectively identified and established a management plan for implementation and monitoring as EIA/EIE is not included in annual Training Matrix.</p> <p>ii) Review process of EIA/EIE is not comprehensive to capture changes in operation, processes and legal</p>
Corrective Actions:	<p>i) RSQM to arrange a training/coaching session to the person in-charge on the management plan establishment in end of end June 2021</p> <p>ii) To revise annual training matrix by inserting training for EIA/EIE</p> <p>iii) To include review process of EIA/EIE as an agenda in EPMC quarterly meeting</p>
Assessment Conclusion:	<p>Remote Major NC close out verification:</p> <p>i) EIA/EIE has been revised dated 22/6/21 and included all related aspects and impacts for threshing, boiler and effluent treatment plant. RSQM training session was carried out on 5/5/21 to the person in charge on environmental and biodiversity matters.</p> <p>ii) Training matrix has been updated and included EIA/EIE training requirement on annual basis.</p> <p>iii) Review process of EIA/EIE being monitored and discussed during quarterly Environmental Performance Monitoring Committee (EPMC). Refer to the latest EPMC meeting dated 12/7/21.</p> <p>The implementation of action plan found to be sufficient to effectively close the major NC on 15/7/21. Continuous implementation will be further verified in the next assessment.</p>

Non-conformity			
NCR Ref #	2045335-202104-M3	Date Issued	16/4/2021
Due Date	15/7/2021	Date of nonconformity Closure	15/7/2021
Clause & Category (Critical / Minor)	3.6.1 (critical/major)		
Statement of Nonconformity:	Health and Safety risk assessment conducted didn't cover all operations in the mill		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	Noted during interview with ETP operator, there was a boat/sampan at the ETP pond which are used if any emergency occurs in the ETP area. However, there was no risk assessment conducted on the usage of boat/sampan.		
Corrections:	To get an assistance from the Regional SQM to review on the risk assessment.		
Root Cause Analysis:	Review process of HIRARC did not cover all possible scenario related to the activities at work place		
Corrective Actions:	Training on health and safety risk assessment to cover all activities in the operation by RSQM representative and review current HIRARC to ensure the assessment covers all operation in the premises during safety committee meeting.		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Assessment Conclusion:	<p>Remote Major NC close out verification:</p> <p>i) HIRARC for the specific emergency response at effluent treatment plant has been updated in the register dated 9/6/21. Specific work instruction has been developed as part of risk control measure for the associated risk identified.</p> <p>ii) Review of HIRARC being monitored and discussed during OSH meeting to ensure any changes required will be captured in the register. Refer to meeting minute dated 20/4/21.</p> <p>The implementation of action plan found to be sufficient to effectively close the major NC on 15/7/21. Continuous implementation will be further verified in the next assessment.</p>
-------------------------------	---

Non-conformity			
NCR Ref #	2045335-202104-M4	Date Issued	16/4/2021
Due Date	15/7/2021	Date of nonconformity Closure	15/7/2021
Clause & Category (Critical / Minor)	6.7.3 (critical/major)		
Statement of Nonconformity:	Workers awareness and importance of PPE was not effectively demonstrated.		
Requirement Reference:	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
Objective Evidence:	<p><u>Bukit Puteri POM</u> During site, noted that the employee was not wearing ear plug when working at Kernel Plant and backhoe driver was not wearing safety helmet during working at FFB reception area.</p> <p><u>Bukit Puteri Estate</u> During site visit, it was sighted 2 harvester riding motorbike and tractor driver not wearing safety helmet.</p>		
Corrections:	To issue warning letter to the worker and the supervisor for failing to comply to company's SOP		
Root Cause Analysis:	Seasonal enforcement for any incompliances amongst the worker on PPE usage from the estate		
Corrective Actions:	<p>i) Continuous enforcement by intensifying SIME card issuance to offender for any incompliances amongst the worker on PPE compliance.</p> <p>ii) Monthly reporting to management on SIME card issuance and report to be presented and discuss during OSH meeting</p>		
Assessment Conclusion:	<p>Remote Major NC close out verification:</p> <p>i) Verified disciplinary measures by the management as part to reminder to workers on the importance of PPE compliance. Interview with the site safety</p>		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>coordinator has confirmed that more proactive measures will be intensified by using existing SIME card for monitoring and disciplining.</p> <p>ii) SIME card reporting recorded and summarized on monthly basis. Implementation for the month of May and June 2021 were sighted.</p> <p>The implementation of action plan found to be sufficient to effectively close the major NC on 15/7/21. Continuous implementation will be further verified in the next assessment</p>
--	---

Non-conformity			
NCR Ref #	2045335-202104-M5	Date Issued	16/4/2021
Due Date	15/7/2021	Date of nonconformity Closure	15/7/2021
Clause & Category (Critical / Minor)	6.2.3 (critical/major)		
Statement of Nonconformity:	Compliance of industry requirements (MAPA/ NUPW) was not implemented effectively		
Requirement Reference:	There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.		
Objective Evidence:	<p>Reviewed the Employee Allowances and Deduction Details of March 2021 in Bukit Puteri Oil Mill found 3 workers who is union member have made the deduction of wages for RM 11 for the union membership fees since they joined on 01/02/2019. There was no reimbursement of RM 3 made to the worker as per MAPA/NUPW Circular No. 22/2015 dated 4/8/2015. The sampled of workers as below:</p> <ol style="list-style-type: none"> 1. Employee No.: 139076 2. Employee No.: 139299 3. Employee No.: 146950 		
Corrections:	To calculate and reimburse to the affected workers in the April salary.		
Root Cause Analysis:	Monitoring of data input and verification process is not adequate		
Corrective Actions:	To add additional level of verification on data input to address and rectify an error immediately		
Assessment Conclusion:	<p>Remote Major NC close out verification:</p> <p>i) Over deduction amount has been reimbursed in the month of April 2021 for all affected union members. Verified the correct deduction made in May 2021, RM 11 deducted and RM 3 reimbursed in the pay slip.</p> <p>ii) Input data for check roll has been checked by assistant manager and verified by the manager prior to payment.</p> <p>The implementation of action plan found to be sufficient to effectively close the major NC on 15/7/21. Continuous implementation will be further verified in the next assessment.</p>		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Non-conformity			
NCR Ref #	2045335-202104-N1	Date Issued	16/4/2021
Due Date	To be closed in the next surveillance assessment	Date of nonconformity Closure	"open"
Clause & Category (Critical / Minor)	2.1.3 (minor)		
Statement of Nonconformity:	Demarcation of legal or authorised boundaries was not visibly maintained.		
Requirement Reference:	i) Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. ii) Sime Darby Plantation EQMS, Section B7, Boundaries issue:1 dated 1/11/2008, clause 7.2 – Estate boundaries must be marked with iron pipes, planted along boundary lines and painted with red/white alternate rings		
Objective Evidence:	Based on site observation at estate boundary with FELDA Sg Koyan (P98G) and Ladang Tanah Makmur Berhad (TMB) (P09B), no boundary marking visibly maintained along the boundary area.		
Corrections:	To construct boundary marking as per SDP EQMS at the selected area and mark the area in boundary stone map for ease of monitoring		
Root Cause Analysis:	The management is not aware of requirement to have a clear boundary marking hence building a trenches along the boundaries is sufficient from the management perspective		
Corrective Actions:	To include boundary monitoring during field patrolling by AP and monthly maintenance schedule by the estate		
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.		

Non-conformity			
NCR Ref #	2045335-202104-N2	Date Issued	16/4/2021
Due Date	To be closed in the next surveillance assessment	Date of nonconformity Closure	"open"
Clause & Category (Critical / Minor)	7.12.7 (minor)		
Statement of Nonconformity:	Outcomes of the monitoring are not fed back into the management plan		
Requirement Reference:	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.		
Objective Evidence:	Visual observation on site; i) Evidence of spraying at buffer zone demarcated area near Sg Telang (field P14C and P09B). ii) Construction of earth drain to mitigate flooding/stagnant water near buffer zone area.		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	Results of monitoring i.e pictorial (riverbanks), water analysis and patrolling records were not been considered in the review and establishment of the management plan.
Corrections:	i) To issue warning letter to the Mandore and sprayers on 19/04/2021. ii) To communicate with Conservation and Biodiversity Unit(CBU) of GSD on the rehabilitation process in the area during their visit to Bukit Puteri Estate
Root Cause Analysis:	The management does not review the management plan effectively which does not include the result monitoring of HCV area.
Corrective Actions:	i) Training on proper documentation of HCV monitoring by CBU on 27th April 2021 ii) To review the management plan during management meeting and to monitor the implementation of action plan on quarterly basis
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Non-conformity			
NCR Ref #	2045335-202104-N3	Date Issued	16/4/2021
Due Date	To be closed in the next surveillance assessment	Date of nonconformity Closure	"open"
Clause & Category (Critical / Minor)	7.11.3 (minor)		
Statement of Nonconformity:	Engagement process with adjacent stakeholders on fire prevention and control measures was not effectively demonstrated.		
Requirement Reference:	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.		
Objective Evidence:	Based on the last stakeholder meeting minute dated 6/7/20, fire prevention and control measures presented to the stakeholders. Adjacent stakeholders (FELDA Sg Koyan, Kg Bertang, Ladang Tanah Makmur Berhad (TMB) and Kg Lubuk Kulit) were invited but none of them attended the meeting. Further verified with the estate assistant, no further engagement process being done for the adjacent stakeholders.		
Corrections:	i) The estate management to confirm on the attendance of the invited stakeholder. ii) The stakeholder who was unable to attend the meeting will be given a copy of the minutes		
Root Cause Analysis:	A mechanism to identify stakeholder adjacent to the operation is not sufficient		
Corrective Actions:	i) To include the agenda as per RSPO requirement in the stakeholder invitation letter ii) To diversify the platform to engage and communicate with the stakeholder on the fire prevention and control measure especially for the adjacent stakeholder. E.g. telephone call, e-mail etc		
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Non-conformity																			
NCR Ref #	2045335-202104-N4	Date Issued	16/4/2021																
Due Date	To be closed in the next surveillance assessment	Date of nonconformity Closure	"open"																
Clause & Category (Critical / Minor)	2.2.2 (minor)																		
Statement of Nonconformity:	Due diligence of contractor was not available.																		
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>1) The FFB transporter (Ling San Wah) in Bukit Puteri Estate did not make the correct amount of SOCSO contribution according to Employees' Social Security Act 1969 (Act 4).</p> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>Passport No.</th> <th>Salary/ Month</th> <th>Amount of Contribution Made</th> <th>Actual Amount of Contribution</th> </tr> </thead> <tbody> <tr> <td>C0818487</td> <td>RM 2,308.94</td> <td>RM 28.10</td> <td>RM 29.40</td> </tr> </tbody> </table> <p>2) Reviewed the permit of the foreign workers found that the name of employer in the permit is not the employer of the workers have signed employment contract with. The sampled of permits as below:</p> <ul style="list-style-type: none"> i. Permit No.: PF 1736789 under employment with Muhibbah Progresif Sdn Bhd ii. Permit No.: PF 1837071 under employment with Syarikat Warasjaya Sdn Bhd <p>3) Besides, reviewed the payslips for January 2021 – March 2021 and FFB Despatch Record found that the workers have worked on rest day. However, no evidence to show that the workers have paid as per Employment Act 1955 for the work on rest day. Interviewed with the contractor confirmed that he only paid normal rate per piece for the work on rest day. Sampled of workers as below:</p> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>Passport No.</th> <th>Date of Work on Rest Day</th> </tr> </thead> <tbody> <tr> <td>C 7126128</td> <td>17/01/2021, 24/01/2021,</td> </tr> <tr> <td>C 0818548</td> <td>14/02/2021, 14/03/2021 and</td> </tr> <tr> <td>C 0818487</td> <td>28/03/2021</td> </tr> </tbody> </table>			Passport No.	Salary/ Month	Amount of Contribution Made	Actual Amount of Contribution	C0818487	RM 2,308.94	RM 28.10	RM 29.40	Passport No.	Date of Work on Rest Day	C 7126128	17/01/2021, 24/01/2021,	C 0818548	14/02/2021, 14/03/2021 and	C 0818487	28/03/2021
Passport No.	Salary/ Month	Amount of Contribution Made	Actual Amount of Contribution																
C0818487	RM 2,308.94	RM 28.10	RM 29.40																
Passport No.	Date of Work on Rest Day																		
C 7126128	17/01/2021, 24/01/2021,																		
C 0818548	14/02/2021, 14/03/2021 and																		
C 0818487	28/03/2021																		
Corrections:	<p>i) To advised contractor to liaise with PERKESO on the SOCSO insufficient deduction.</p> <p>ii) Ling San Wah need to provide agreement on "temporary employment" from the stated company.</p> <p>iii) Brief Lin San Wah on the Employment Act 1955 about the work on rest day.</p>																		
Root Cause Analysis:	The mechanism to conduct contractor's due diligence is not being communicated to the management thoroughly																		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Corrective Actions:	i) To arrange for a training to contractor on the requirement to comply to the legal regulation such as Employment Act 1955 and Immigration Act 1959/63 ii) To monitor contractor’s compliance on a quarterly basis by RSQM
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	7.12.6 – A programme to regularly educate the workforce about the status of RTE species to be put in place. Information related to RTE and disciplinary measures 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 to be included in the programme for improvement
OFI 2	2.1.2 – A documented system to ensure compliance to be consistently updated. Mill is currently running with CL (contravene of license) for section 14 under air pollution management. Changes to the license condition has yet to be complied if the CL is still required for operation.

Positive Findings	
PF #	Description
PF 1	Good cooperation given to the audit team by site and HQ team
PF 1	No negative feedback received from the internal and external stakeholders.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2020.1	Date Issued	19/9/20
Due Date	18/12/20	Date of nonconformity Closure	2/10/20
Clause & Category (Critical / Minor)	6.2.2 (critical/major)		
Statement of Nonconformity:	Bukit Puteri Estate region does not fall in urban area and therefore RM 1100/month is applicable. However, sample sighted for foreign worker’s extension of employment agreement stated minimum salary is RM 1200/month but wages appear in worker’s pay slip is calculated based on RM 1100/month. Aside, there is no clear terms available for the work type “Afternoon Casual Work” for works carried out after normal working hours at which the workers are paid on piece rated that violating clause “Working Hours” in Letter of Appointment stating “ <i>Overtime means work done after your normal working hours</i> ”. This was cross verified against “Borang Permohonan” from Field Supervisor to Manager dated on 10/01/2020 which is also ticked on piece rated		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

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:	As per Minimum Wage Order 2020 which came into effect 01/02/2020, providing for minimum wages set at RM 1200.00/month or RM 5.77/hour for those workers paid at hourly rate and for rural area is RM 1100/month.
Corrections:	To review all the affected foreign worker employment contract and replace with the correct appendix. To seek clarification/advice from the related department on the guideline for data entry process.
Root Cause Analysis:	Lack of verification process in the documentation process. Unavailability of standard/guideline leads to misinterpretation of the term used in the payroll system.
Corrective Actions:	To ensure the document which related to worker employment are thoroughly verified before signing. To ensure data entry process follows the guideline or written communication instructed by HQ.
Assessment Conclusion:	Based on the desk verification of the addressed corrective actions, a phone conversation was done by LA with Regional Sustainability Executive to further clarifications of corrective actions. Since, the estate and mill has done 100% screening of the workers employment agreement and correction had made with concern from workers. Therefore, this finding closed and the effectiveness of corrective action will be verified in next assessment.

Opportunity for Improvement	
OFI#	Description
OFI 1	OFI Statement: 7.3.2 – Consideration to maintain the consistency of landfill management to ensure the landfill is always in good condition. Verification / Follow-up actions: Management of landfill is guided by Operational Control Procedure for Landfill Management In Estate (SD/SDP/PSQM(ESH)203-EN7) dated 13th march 2017. No major deviation in term of implementation observed on site.
OFI 2	OFI Statement: 2.1.1 – License for water source – SWUL/LPSA/58/2019, water extraction from Sungai Sertang, Batu Yon Lipis. The license expired on 31/12/2019, however a letter dated 19/12/2019 from “Pejabat Setiausaha Kerajaan Pahang” stating renewal process are stop till further notice Verification / Follow-up actions: License and permit renewal is being monitored using dashboard for tracking. As for the license of water source, still the status is pending based on announcement made by “Pejabat Setiausaha Kerajaan Pahang”.

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2020.01	Major	6.2.2	19/9/2020	2/10/2020

2045335-202104-M1	Major	7.8.2	16/4/2021	Closed out on 15/7/2021
2045335-202104-M2	Major	7.10.3	16/4/2021	Closed out on 15/7/2021
2045335-202104-M3	Major	3.6.1	16/4/2021	Closed out on 15/7/2021
2045335-202104-M4	Major	6.7.3	16/4/2021	Closed out on 15/7/2021
2045335-202104-M5	Major	6.2.3	16/4/2021	Closed out on 15/7/2021
2045335-202104-N1	Minor	2.1.3	16/4/2021	"open"
2045335-202104-N2	Minor	7.12.7	16/4/2021	"open"
2045335-202104-N3	Minor	7.11.3	16/4/2021	"open"
2045335-202104-N4	Minor	2.2.2	16/4/2021	"open"

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss SOU 10 Bukit Puteri POM 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.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Governmental Department	Labour Department, Raub	Phone interview
Communities	RTP Sg Ular	Phone interview
External/Union	NUPW Temerloh	Phone interview
Contractor	FFB Suppliers & Smallholder	Phone interview
Union	NUPW Representatives	Face to face interview
Internal	Gender Committee Representatives & female workers	Face to face interview
Governmental Department	Jabatan Alam Sekitar Cameron Highland Officer	Phone interview
Internal	Foreign workers	Face to face interview

Stakeholders comment	
1	Feedbacks: JTK Raub – She informed that no complain received from the workers in both Bukit Puteri POM and Bukit Puteri Estate. The managements are in compliance with the legal requirements.
	Audit Team verification and response: No further issue.
2	Feedbacks: Representative from local community (RTP Sg Ular) – He informed that no encroachment of land by the management. Boundaries were maintained. The company provides job opportunity to the local communities and they provide assistance for requests from local communities such as borrow of backhoe. The representative hopes that the management could actively involve in the activities organize by the local community such as <i>gotong-royong</i> and carry out schedule grass cutting at the field as per previous management.
	Audit Team verification and response: The management will make a schedule of grass cutting and participant activity organize by the local community if there is any official letter receive. This to be verified during next assessment.
3	Feedbacks: Chief Officer, NUPW Temerloh – He informed that there was no complaint received from the workers. However, the officer hopes that the management could corporate with NUPW to encourage all the work to join the association. His goal is to strive 100% memberships..
	Audit Team verification and response: The management will contact NUPW Officer to arrange a briefing of benefit of NUPW to the workers and will organize awareness training to all the workers. This to be verified during next assessment.
4	Feedbacks: FFB Suppliers & Smallholder – They informed that pricing mechanism has been briefed by the management prior they send the FFB to the mill. They has signed the agreement and understood the terms and conditions outlined in the agreement. There was no delay in payment by the company. If there is any complaint, they will report immediately to the management and action has been taken to rectify by the management accordingly. No land encroachment by the management as well where the smallholder’s land is boundary to the land of estate.
	Audit Team verification and response: The management will continue to ensure payment make promptly and maintain good relationship with the suppliers and smallholder. Verified the payment records found no issue.
5	Feedbacks: NUPW Representatives – They informed that no pending issue during the time of audit. They will discuss with the management if there is any issue reported. Workers are paying in accordance with Minimum Wage Order 2020.
	Audit Team verification and response: The management will continue to ensure the workers are paying accordingly. No other issue.
6	Feedbacks: Gender Committee Representatives & female workers – They informed that no sexual harassment and violence case reported since last audit. The female workers understand the function of Gender committee and aware of the complaint mechanism if there is any issues. They were treated equally without any discrimination by the management.
	Audit Team verification and response: The management will respect the rights of female employees and monitor if there is any case of sexual harassment and violence happen. No further issue.
7	Feedbacks: Jabatan Alam Sekitar Cameron Highland Officer – He informed that the mill has complied with the legal requirements. No complaint received from stakeholders towards the mill. The last inspection to the mill was conducted on January 2021.
	Audit Team verification and response: The management will continue to ensure compliance towards the legal requirements. No other issue.

8	<p>Feedbacks: Foreign workers – They did not pay any recruitment fee for getting a job in Sime Darby. They have been briefed on the terms and conditions and working environment in the plantations while they were in home country. No contract substitution occurred. Their wages are paid according to Minimum Wage Order 2020 and overtime was offered to them on voluntary basis. There are few workers who under CFS for lining polybag were not understand on the terms and conditions of the CFS such as why the payment of work done not being paid together with the monthly salary.</p> <p>Audit Team verification and response: The management will brief to the workers on the terms and conditions of CFS to make sure they understand how’s the payment will be made. To be further verified during next assessment.</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 estate has undergone 2 cycle of replanting.					

Previous land owner / user comment	
	Feedbacks: N/A
	Audit Team verification and response:

3.5 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.

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Bukit Puteri POM certification unit has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Bukit Puteri POM certification unit is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidhir Zainal Abidin	Name: THE CHINA ENGINEERS (MALAYSIA) SDN BHD Company No. 7358-K
Company Name: BSI Services (M) Sdn Bhd	Company Name: BUKIT PUTERI ESTATE
Title: Lead Auditor	Title: MOHD SAFIRUS BIN HAILANI SENIOR 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: 29th July 2021	Date: 07/08/2021

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	(C) Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance -	Publicly available management documents such as land titles, OHS plans, EIA and SIA reports, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans are available. All operating units have individual documents and records to demonstrate compliance to this indicator. Sustainability Reports, policies and procedures are also accessible through the company’s website: http://www.simedarbyplantation.com/ .	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	All the related information was in Bahasa Malaysia and English and accessible to the stakeholders upon request.	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	The mill and estate have maintained the DOSH inspection logbook, visitor logbook, DOE logbook and complaint book to record any requests and responses from the stakeholders. Seen the DOE inspection logbook where the last inspection was conducted on 28/01/2021 to assess the effluent treatment plant progress. Records of inspection was maintained in the logbook.	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	Sime Darby Plantation Estate Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 1, issue date 1/4/2008). The procedure has detailing the process of handling complaints from stakeholders and the time	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	- Critical (Major) compliance -	<p>frame for external communication to be dealt with. The time frame to provide feedback is within two weeks of the date of receipt for communication and within one week of the completion of the investigation.</p> <p>Assistant Manager of the mill and Senior Assistant Manager of Bukit Puteri Estate has been appointed as the social officer to handle any issues related to social at the site. Appointment letter issued by the Mill Manager dated 01/03/2019 and 04/01/2021 issued by Estate Manager was sighted.</p> <p>The last combined stakeholder meeting was conducted on 06/07/2020 for Bukit Puteri Oil Mill and Bukit Puteri Estate. Stakeholders such as local authorities, FFB suppliers and contractors have participated in the meeting. Meeting minutes was sighted. There were some requests from the stakeholder which have recorded in the minutes. Action plan was developed incorporated into the Management Plan on Social Impact Assessment.</p> <p>Besides, there was a meeting between management of Bukit Puteri Estate and cattle's owners conducted on 05/01/2021. The purpose of the meeting was to inform the owners to remove the cattle out of the estate's compound. Meeting minutes was sighted.</p>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>Stakeholder list FY 2021 was established in both mill and estate. Stakeholder such as local communities, authorities, contractors, suppliers, FFB suppliers and NGOs were included in the list. Nominated representative with contact number and address was sighted.</p>	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has developed and implemented Code of Business Conduct (Aug 2020) where the company implemented the integrity, respect & responsibility, enterprise and excellence during</p>	Complied

		any business process. The policy was developed in Bahasa Malaysia, English and Bahasa Indonesia which can be downloaded via https://www.simedarbyplantation.com/corporate/ethical-business-practices . A Vendor Code of Business Conduct Briefing for stakeholders from Central East Region organized by Group Procurement together with Group Compliance on 26/03/2021 through Microsoft Teams. Seen the list of participants that accepted the invitation.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Sime Darby Plantation has implemented Whistleblowing Policy to help all stakeholders raise concerns, without fear of retaliation on any wrongdoing that they may observe in Sime Darby Plantation Group. The channels of whistleblowing are such as E-form that could be downloaded via https://www.simedarbyplantation.com/corporate/whistleblowing or through email, call or write letter to the Whistleblowing unit in Head Office. Besides, the company established Internal Audit to monitor the compliance and implementation of the policy throughout the plantations. Internal audit was carried out on 16/03/2021 in Bukit Puteri Oil Mill and 15/03/2021 in Bukit Puteri Estate. Sampled the contractors and vendors signed on Vendor Integrity Pledge: i. Company No.: 1116699-W ii. Company No.: 000705533-W	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.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	Bukit Puteri POM i) DOE License/Jadual Pematuhan: JP/KKS/2021/2021/004160 (validity period 1/7/2020 – 30/6/2021) for 20 mt/hr and method of POME discharge is waterways. BOD limit is < 100 mg/l.	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>ii) Contravene of licence for air emission, for emission limit not exceeding 400 mg/m³ for particulate matter (PM) JPLP/PBU/06/005186, license no. 005086 valid until 4th June 2021. - additional requirement (stack sampling every 3 months) under clause 3 of CL.</p> <p>iii) License for electrical installation, serial no. 45095, license no. 2020/01760, installation capacity: 1,700 kW valid until 19/9/21.</p> <p>iv) Certificate of fitness</p> <table border="1" data-bbox="1137 619 1921 850"> <thead> <tr> <th>UPV/SB</th> <th>Registration no.</th> <th>Expiry date</th> </tr> </thead> <tbody> <tr> <td>Air receiver</td> <td>PH PMT 791</td> <td>27/2/2022</td> </tr> <tr> <td>Back pressure receiver</td> <td>PH PMT 785</td> <td>27/2/2022</td> </tr> <tr> <td>Thermal deaerator</td> <td>PH PMT 783</td> <td>27/02/2022</td> </tr> <tr> <td>Steam boiler</td> <td>PH PMD 568</td> <td>27/02/2022</td> </tr> </tbody> </table> <p>v) MPOB license, 536632004000 (FFB – milling, CPO, PK, SPO – storage etc) valid until 28/2/2022. Approved processing capacity: 120,000 mt.</p> <p>vi) Competent person</p> <table border="1" data-bbox="1137 1010 1921 1367"> <thead> <tr> <th>Competency</th> <th>Registration no.</th> <th>Expiry date</th> </tr> </thead> <tbody> <tr> <td><u>CePSWaM</u></td> <td>CePSWaM/197659</td> <td>-</td> </tr> <tr> <td><u>CePPOME</u></td> <td><u>CePPOME/184054</u></td> <td>-</td> </tr> <tr> <td>Authorized Gas Tester and Entry Supervisor (AGTES)</td> <td>NW-HQ-AGT-0481-R</td> <td>Valid until 30/7/21</td> </tr> <tr> <td>Steam Engineer (2nd Grade)</td> <td>049/2009</td> <td>-</td> </tr> <tr> <td>2nd grade engine driver</td> <td>PH/19/EIS/02/00078</td> <td>-</td> </tr> </tbody> </table>	UPV/SB	Registration no.	Expiry date	Air receiver	PH PMT 791	27/2/2022	Back pressure receiver	PH PMT 785	27/2/2022	Thermal deaerator	PH PMT 783	27/02/2022	Steam boiler	PH PMD 568	27/02/2022	Competency	Registration no.	Expiry date	<u>CePSWaM</u>	CePSWaM/197659	-	<u>CePPOME</u>	<u>CePPOME/184054</u>	-	Authorized Gas Tester and Entry Supervisor (AGTES)	NW-HQ-AGT-0481-R	Valid until 30/7/21	Steam Engineer (2 nd Grade)	049/2009	-	2 nd grade engine driver	PH/19/EIS/02/00078	-	
UPV/SB	Registration no.	Expiry date																																		
Air receiver	PH PMT 791	27/2/2022																																		
Back pressure receiver	PH PMT 785	27/2/2022																																		
Thermal deaerator	PH PMT 783	27/02/2022																																		
Steam boiler	PH PMD 568	27/02/2022																																		
Competency	Registration no.	Expiry date																																		
<u>CePSWaM</u>	CePSWaM/197659	-																																		
<u>CePPOME</u>	<u>CePPOME/184054</u>	-																																		
Authorized Gas Tester and Entry Supervisor (AGTES)	NW-HQ-AGT-0481-R	Valid until 30/7/21																																		
Steam Engineer (2 nd Grade)	049/2009	-																																		
2 nd grade engine driver	PH/19/EIS/02/00078	-																																		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">1st grade engine driver</td> <td style="width: 30%;">PA/05/2014</td> <td style="width: 40%; text-align: center;">-</td> </tr> <tr> <td>Electrical chageman A4</td> <td>PJ-T-3-H-0001-2007</td> <td>Valid until 23/2/2022</td> </tr> </table> <p>vii) Fire certificate, serial no.: 32558, license no. JBPM:PH/7/0191/2017 valid until 7/11/21.</p> <p>Sime Darby Plantation Sdn Bhd has obtained approval from <i>Jabatan Tenaga Kerja Semenanjung Malaysia</i> for the following:</p> <ol style="list-style-type: none"> i. Ref. No.: BHG. PU/9/129 JLD 3 (53) dated 06/07/2017 for deduction of wages for electricity bill. ii. Ref. No.: BHG. PU/9/134 JLD 9 (11) dated 27/03/2017 for overtime limit for 130 hours. <p>The mill is in the process to obtain approval from <i>Jabatan Tenaga Kerja Raub</i> for female workers to work after 10pm. The 1st application was carried out on May 2020. However, due to insufficient of documents, the authority has rejected the application. The last communication between the mill to the authority was done on 22/03/2021. This issue was raised by Internal Audit team on 16/03/2021 and the management has immediately informed the estate and mill not to send crop after 9pm during SOU 10 meeting conducted on 18/03/2021. Reviewed the punch card for March and April 2021 and the crop delivery report found that no crop was received after 9pm by the mill.</p> <p><u>Bukit Puteri Estate</u> Permit and license checked: i) MPOB license, 524186002000 "menjual dan mengalih" valid until 31/10/21. Estate hectarage – 3,875.8 ha</p>	1 st grade engine driver	PA/05/2014	-	Electrical chageman A4	PJ-T-3-H-0001-2007	Valid until 23/2/2022	
1 st grade engine driver	PA/05/2014	-							
Electrical chageman A4	PJ-T-3-H-0001-2007	Valid until 23/2/2022							

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>ii) Diesel Permit, serial number: C000440, ref. no.: PPDNKK.PHG.RUB.600-5/4/063, storage capacity: 16,830 litre valid until 25/05/21</p> <p>iii) Certificate of fitness (CF) for air compressor, reg. no. PH PMT 81559, valid until 15/12/21</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>SOU10 had documented the Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment. Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4a: Procedure for Legal and Other Requirements dated 1 November 2008. Tracking of changes is by Sime Darby SQM team disseminated to all SOUs. Latest evaluation of compliance and review was done on 16/3/20. Noted that Minimum Wages Order 2020 and Prevention and Control of Infectious Disease Act 1988 (Act 342) has been updated in the register.</p> <p>OFI - A documented system to ensure compliance to be consistently updated. Mill is currently running with CL (contravene of license) as per section 14 under air pollution management. Changes to the license condition has yet to be complied if the CL is still required for operation.</p>	OFI
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>Demarcation of legal or authorised boundaries was not visibly maintained. Based on site observation at estate boundary with FELDA Sg Koyan (P98G) and Ladang Tanah Makmur Berhad (TMB) (P09B), no boundary marking visibly maintained along the boundary area. Thus, a minor NC was raised.</p>	Non-compliance
<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			

2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>List of contracted parties is maintained and documented under stakeholder list at each visited operating units.</p> <p><u>Bukit Puteri POM</u></p> <p>For FFB suppliers, external FFB supplier listed under Outside Crop Producer (OCP) with the total 12 suppliers.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>All contracts those for FFB supply, contain specific clauses on meeting applicable legal requirements were spelled out in the contract. FFB contract sampled;</p> <ul style="list-style-type: none"> i) Green Agro Pyramid Business Trading, P/C/1220/FFB02545L for one (1) year from January to December 2021. ii) MXF Gemilang Enterprise, P/C/1220/FFB02550L for one (1) year from January to December 2021. iii) Agarwal Oil Palm Plantation Sdn Bhd, P/C/1220/FFB02554L for one (1) year from January to December 2021. <p>Contract agreement for replanting contractor (Jasa Awah Enterprise) dated 23rd June 2020.</p> <p>Evidence of due diligence is demonstrated during vendor registration phase where the contractor has to sign a Vendor Integrity Pledge (VIP) registration and to comply with para a(i); Vendor Code of Business Conduct (VCOBC) and a(ii); all applicable laws and regulations related anti-bribery, fraud and corruption.</p> <p>VIP checked:</p> <ul style="list-style-type: none"> a) Green Agro Pyramid Business Trading (IP0316449-W) b) MXF Gemilang Enterprise (CT0067020-X) c) Agarwal Oil Palm Plantation Sdn Bhd (37493-U) 	Non-compliance

**RSPO P&C Public Summary Report
Revision 12 (Jun 2021)**

		<p>d) Jasa Awah Enterprise</p> <p>However it was noted that due diligence for contractor, Ling Sang Wah was not evidently demonstrated. The non-compliances were observed;</p> <p>1) The FFB transporter (Ling San Wah) in Bukit Puteri Estate did not make the correct amount of SOCSO contribution according to <u>Employees' Social Security Act 1969 (Act 4)</u>.</p> <table border="1" data-bbox="1220 603 1915 769"> <thead> <tr> <th>Passport No.</th> <th>Salary/ Month</th> <th>Amount of Contribution Made</th> <th>Actual Amount of Contribution</th> </tr> </thead> <tbody> <tr> <td>C0818487</td> <td>RM 2,308.94</td> <td>RM 28.10</td> <td>RM 29.40</td> </tr> </tbody> </table> <p>2) Reviewed the permit of the foreign workers found that the name of employer in the permit is not the employer of the workers have signed employment contract with. The sampled of permits as below:</p> <ul style="list-style-type: none"> i. Permit No.: PF 1736789 under employment with Muhibbah Progresif Sdn Bhd ii. Permit No.: PF 1837071 under employment with Syarikat Warasjaya Sdn Bhd <p>3) Besides, reviewed the payslips for January 2021 – March 2021 and FFB Despatch Record found that the workers have worked on rest day. However, no evidence to show that the workers have paid as per Employment Act 1955 for the work on rest day. Interviewed with the contractor confirmed that he only paid normal rate per piece for the work on rest day. Sampled of workers as below:</p> <table border="1" data-bbox="1220 1273 1915 1369"> <thead> <tr> <th>Passport No.</th> <th>Date of Work on Rest Day</th> </tr> </thead> <tbody> <tr> <td>C 7126128</td> <td></td> </tr> </tbody> </table>	Passport No.	Salary/ Month	Amount of Contribution Made	Actual Amount of Contribution	C0818487	RM 2,308.94	RM 28.10	RM 29.40	Passport No.	Date of Work on Rest Day	C 7126128		
Passport No.	Salary/ Month	Amount of Contribution Made	Actual Amount of Contribution												
C0818487	RM 2,308.94	RM 28.10	RM 29.40												
Passport No.	Date of Work on Rest Day														
C 7126128															

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<table border="1"> <tr> <td>C 0818548</td> <td rowspan="2">17/01/2021, 24/01/2021, 14/02/2021, 14/03/2021 and 28/03/2021</td> </tr> <tr> <td>C 0818487</td> </tr> </table>	C 0818548	17/01/2021, 24/01/2021, 14/02/2021, 14/03/2021 and 28/03/2021	C 0818487							
C 0818548	17/01/2021, 24/01/2021, 14/02/2021, 14/03/2021 and 28/03/2021											
C 0818487												
		Thus, a minor NC was raised.										
2.2.3	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. - Minor compliance -	Generic clause related to disallowing child, forced and trafficked labour written in Vendor Pledge Registration @ VIP and to undertake Vendor Code of Business Conduct (VCOBC) with regards to labour and human rights. Verified VIP the above sampled suppliers evidently available for verification.	Complied									
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.												
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> Information on geo-location of FFB origins Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>For directly sources FFB own supply base and OCP estate, details of OCP summarized as per below sample:</p> <table border="1"> <thead> <tr> <th>Estate/Out growers</th> <th>MPOB license & validity</th> <th>GPS Location</th> </tr> </thead> <tbody> <tr> <td>MXF Gemilang Enterprise</td> <td>618974002000 valid until 31/12/21</td> <td>Lat: 4.2756390 long: 101.8531820</td> </tr> <tr> <td>Agarwal Oil Palm Plantation Sdn Bhd</td> <td>502530602000 valid until 28/10/21</td> <td>Lat: 4.245194 long: 101.901679</td> </tr> </tbody> </table>	Estate/Out growers	MPOB license & validity	GPS Location	MXF Gemilang Enterprise	618974002000 valid until 31/12/21	Lat: 4.2756390 long: 101.8531820	Agarwal Oil Palm Plantation Sdn Bhd	502530602000 valid until 28/10/21	Lat: 4.245194 long: 101.901679	Complied
Estate/Out growers	MPOB license & validity	GPS Location										
MXF Gemilang Enterprise	618974002000 valid until 31/12/21	Lat: 4.2756390 long: 101.8531820										
Agarwal Oil Palm Plantation Sdn Bhd	502530602000 valid until 28/10/21	Lat: 4.245194 long: 101.901679										
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1. - Minor compliance -	Information with regards of indirect source of FFB from out-growers are still in progress. As minimum, a valid MPOB license is required for registration and evidence of legality. For Bukit Puteri POM SOU10, there are indirect FFB received from collection centres, agents or other intermediaries and in the progress of obtaining all	Complied									

		information. Based on the RSG plan for OCP (indirect FFB), the time bound plan in to be completed by 2022.	
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 10 has continued its commitment to long term sustainability and improvements through a capital expenditure program. The management has forecasted 5 years business plan from FY 2020 – 2024. Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. Sighted the annual budget FY 2020 and business plan FY 2021 – FY 2025. In the 5 years business plan include items as follows:</p> <ul style="list-style-type: none"> a. Palm oil mill <ul style="list-style-type: none"> i. Mill intake – FFB input ii. Production of CPO iii. Production of PK iv. Total Palm Oil Extraction v. Total Palm Kernel Extraction vi. Mill cost b. Oil Palm Estate <ul style="list-style-type: none"> i. Total crop projection and yield potential ii. Activity direct cost b. Manuring c. Harvesting and collection d. Transportation 	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>SOU 10 have long range replanting program from FY2021 until FY 2025. Replanting planned for the palm older than 25 years, non-performance field (yield) and ganoderma infected palm. Observed the replanting program for the next financial year as follows:</p> <table border="1" data-bbox="1137 528 1883 683"> <thead> <tr> <th>Estate</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Bukit Puteri</td> <td>83.38</td> <td>105.88</td> <td>254.1</td> <td>202.44</td> <td>185.16</td> </tr> </tbody> </table>	Estate	2021	2022	2023	2024	2025	Bukit Puteri	83.38	105.88	254.1	202.44	185.16	Complied
Estate	2021	2022	2023	2024	2025										
Bukit Puteri	83.38	105.88	254.1	202.44	185.16										
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>Management review was carried out on 30th March 2021 combined with RSPO SCCS review.</p>	Complied												
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>															
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>SOU10 has established continual improvement plan. Sighted the sampled plan/projects at visited as follows:</p> <ul style="list-style-type: none"> i. SIME card (safety) ii. To identify unsafe act and condition to minimize near misses/accident occurrences iii. SEMUA 2.0 iv. To keep tracks on the FFB movement from the field up to the mill. v. SMS IT system vi. Reporting on accidents, OSH program, alert and expiring dates for permits and licenses vii. Sime Darby Digital Supervision viii. Reporting on field inspection 	Complied												

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<ul style="list-style-type: none"> ix. Sanitation x. Suara Kami (Whistle-blowing) collaboration with Nestle <p>Budget allocation on CAPEX for 2021:</p> <ul style="list-style-type: none"> i) Dearator – Boiler station process efficiency ii) Weighbrige – Upgrading (15m x 3.4m x 60MT) capacity iii) New Holding Pond – Annual desludging programme 	
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>Report of the Palm GHG Version 4, ACOP latest for 2019 were made available for verification</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>SOP was established for the Estates. Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units under SOU8 as a guidance document to conduct estate operation. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc.</p> <p>Palm Mill holds two SOPs: sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill. Sime Darby has established a system to monitor the mill operation. The visited the operating units on timely basis. Their reports cover on all aspect of operation.							
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	Sime Darby has established mechanism to monitor the implementation of their procedure by Mill advisor/ Plantation Advisor Visit, Structured Oil Recovery Assessment (SORA) and Planning and Monitoring Unit, Performance Monitoring Visit and Agronomist Visit. The visit focusing on Yield Improvement, Crop Recovery, Replanting and Immature Palms Maintenance and Mature Upkeep on all aspect of operations in the mill and estates.	Complied						
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	3 rd party compliance audit by 3 rd party @ DOE license auditor under Green Orbis Environmental Sdn Bhd, EA0101/CESSWI3756. The audit was done on 23/11/2020 once in every license period. Issues highlighted: i) CEMS analyser not functioning due to lightning strike since October and has yet to notify DOE on this matter. ii) Holding pond was constructed in end of September 2020. Due to rainy season, erosion has been observed at slope of the holding pond. Stack sampling (6 monthly basis)	Complied						
		<table border="1"> <thead> <tr> <th>Stack/Boiler</th> <th>Monitoring date</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Stack/Boiler	Monitoring date	Remark				
Stack/Boiler	Monitoring date	Remark							

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>Boiler no. 1</p> <p>2020 (1st monitoring) Dust concentration – 33 mg/m³ vs 150 mg/m³ NOx – 14 mg/m³ vs 700 mg/m³ SO – 10 mg/m³ vs 500 mg/m³ CO – 167 mg/m³ vs 1000 mg/m³</p> <p>2020 (2nd monitoring) Dust concentration – 42 mg/m³ vs 150 mg/m³ CO – 113 mg/m³ vs 1000 mg/m³</p>	<p>February 2020 ALM/THECHINA/0220/5773. Report dated 4th March 2020</p> <p>November 2020 ALM/THECHINA/0220/5773. Report dated 2nd January 2021.</p>		
		<p>Boiler no. 2</p> <p>2021 – 1st monitoring 18/3/21</p> <p>2020 (1st monitoring) Dust concentration – 57 mg/m³ vs 150 mg/m³</p>	<p>Waiting for final report</p> <p>February 2020 ALM/THECHINA/0720/5985. Report</p>		

			CO –284 mg/m3 vs 1000 mg/m3	dated 27 th July 2020	
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.					
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	There was no new planting reported in Bukit Puteri Estate. SIA was conducted on 17 – 18/09/2015 for SOU 10 Bukit Puteri POM and Bukit Puteri Estate by Social & Environment Projects Unit, PSQM Department. The methodology of the assessment was through field interview with stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, officers from government authorities and internal workers. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community, education, safety and health, living condition, infrastructure and amenities and stakeholder engagement were assessed accordingly			Complied
3.4.2	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 -	SOU 10 has established Environmental Management Plan and was made available in the estates/mill for review. Internal stakeholders (estate and mill team) were consulted for during review process especially for those interact directly with the activities at estate’s and mill’s workstation. Result of participation will be considered as part of EIA review process. If there is any environmental incidents or changes of process (new installation/modification, EIA will be reviewed to evaluate the environmental impact.			Complied

		<p>Social management plan was developed in Bukit Puteri Oil Mill on 13/01/2021 and 18/02/2021 in Bukit Puteri Estate. The management plan was developed after collected the feedbacks and issues during various of meeting such as stakeholder meeting, union meeting and gender committee meeting</p>	
<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>The management plan established base on operation with significant impact to the environment. The management plan was reviewed annually. The management plan stated the environmental issue, mitigation actions, monitoring plan and person responsible for monitoring implementation. Plan for FY2021 was made available for review. Among established plan sighted:</p> <ul style="list-style-type: none"> i) Water pollution – Plan: Desludging work for ETP pond by using Geotube method. ii) Air Pollution – Installation of ESP to comply with Clean Air Regulation 2014 iii) High water usage – Eliminate water wastage by dry cleaning and rectify water oil or water leaking iv) High boiler fuel consumption – Rectify steam leakage, motor capacitor bank installation. <p>The social management plan was implemented, reviewed and updated on yearly basis in the participatory way by collected feedbacks during meeting with stakeholders. Seen the Social Management Plan 2020 in both mill and estate where the issues captured in the stakeholder meeting and NUPW meeting were included. Reviewed the area of concerns for Social Management Plan 2020 as below:</p> <ol style="list-style-type: none"> 1. Area of concern: Main road to the mill need to upgrade as many potholes. 	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>Action taken: The management has informed estate management to carry out road grading and seen the photo evident of road has been repaired. The management decided to keep this issue as this is require continuously monitoring to ensure the road is always in good condition.</p> <p>2. Area of concern: No grass cutting in the housing complex. Action taken: The management has appointed new contractor to carry out grass cutting activity in housing complex on January 2021. Seen the agreement between the management and grass cutting contractor which valid until 31/12/2021. Site visit to the housing complex found that it is well maintained. The grass cutting was carried out twice a month.</p> <p>3. Area of concern: Land title still under Austral Enterprise Berhad and Sime Darby Austral Holdings Berhad. Action taken: The management communicated with Land Management Department on the status of the estate land title. Last communication was on 17/09/2020 and it is still in progress.</p>	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>The Human Resource Department in HQ has established Hiring of Local Workers procedure (Doc. No.: 01-12-19) dated 01/12/2019 and Workforce Management Unit Liaison & Recruitment procedure (WMU/LR-SOPP/MARCH2016, Rev. 0 dated 30/03/2016) to explain the recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried out by the HQ through appointed agents in respective countries.</p>	Complied

3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Application form, employment interview assessment form, medical check-up report and employment contract was sighted for new recruited employees. The latest recruitment of workers in Bukit Puteri Oil Mill was on March 2021. A copied of identification card was kept as record. Interviewed with the clerk confirmed that if there is any job vacancy available, they will publish a job vacancy advertisement at the places nearby the villages. Seen the job vacancy notice for Operator position. Bukit Puteri Estate has employed parole labour as this is the engagement between Sime Darby and the government. The personal file and employment contracts for parole labour was sighted.</p>	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby has established the Upstream Malaysia Health, Safety and Environment (HSE) Policy Statement signed by the CEO Upstream Malaysia dated 01/06/2020. The policy stated the company commitment to provide safe and healthy workplaces and operating in an environmentally responsible manners in all operations in Malaysia. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the estate.</p> <p>Sime Darby has established SOP for HIRARC. Refer Estate Quality Management System, Level 2: Standard Operating Manual, Subsection 5.4: Planning, Appendix 5.4.1a Hazard Identification, Risk Assessment and Risk Control (HIRARC) Procedure ver. 1 Year 2008, issue no. 1 dated 1/4/2008.</p> <p>The operating units has conducted assessment on health and Safety issue in their operation and documented in the HIRARC register. The HIRARC register was reviewed at minimum once a year or during accident occur or changes in the operation.</p>	Non-compliance

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p><u>Bukit Puteri POM</u></p> <p>FY 2020, HIRARC review was conducted on 15/05/2020 and 11/07/2020 with changes to thresher station, turbine station, Furnace station and nut cracker station. Latest HIRARC review was conducted on 05/03/2021 with changes to cleaning of steriliser top body operation and COVID 19.</p> <p>Noted during interview with ETP operator, there was a boat/sampan at the ETP pond which are used if any emergency occurs in the ETP area. However, there was no risk assessment conducted on the usage of boat/sampan. Thus, a major NC was issued.</p> <p><u>Bukit Puteri Estate</u></p> <p>Latest HIRARC review was conducted on 05/04/2021 with changes in Mechanical Cutter operation.</p> <p>For contract work, the contractors provide a copy of Job Hazard Analysis to the mill. Reviewed the Job Hazard Analysis for Truck Scale System and other Ancillary works at Bukit Puteri POM by Teras Integrasi Sdn. Bhd. dated 02/04/2021.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The mill has established Safety and Health plan was documented in OSH and Other Requirements Plan FY 2020 and FY 2021. Reviewed the implementation of the management plan FY 2020 as follows:</p> <p><u>Bukit Puteri POM</u></p> <ol style="list-style-type: none"> 1. Latest medical surveillance was conducted on 10 – 11/03/2021 as per purchase no. 4300534307 dated 17/02/2021. The report was yet to be received by the mill. FY 2020, the medical surveillance was conducted on 03 – 04/03/2020 for 9 workers. 	Complied

		<p>The surveillance was conducted by OHD with reg. no. HQ/14/DOC/00/369. All workers were found fit to work as chemical handlers.</p> <ol style="list-style-type: none"> 2. FY 2020, LEV annual inspection, testing and examination was conducted on 04/07/2020 hygiene technician with reg. no. HQ/09/JHII/00/155. Refer report no. HQ/09/JHII/00/155-2020/BP. The system found satisfactory comply with ACGIH standard/DOSH requirement. 3. Monthly LEV monitoring was conducted by the laboratory conductor. Reviewed the monitoring records dated 01/10/2020, 02/11/2020, 01/12/2020, 01/01/2021 and 01/02/2021. 4. Latest audiometric test was conducted on 28/09/2020. Based on the test results, 13 employee were identified to have Standard Threshold Shift and 1 with hearing impairment. The involved employee were sent for retest on 16 – 17/03/2021 as per purchase order no. 4300534144 dated 15/02/2021. The results has yet to be received by the mill during the audit. <p><u>Bukit Puteri Estate</u></p> <ol style="list-style-type: none"> 1. Latest CHRA was conducted on 10/06/2020 by assessor with registration no. HQ/14/ASS/00/358. Refer report no. HQ/14/ASS/00/00001-2020/13. 2. FY 2020, chemical surveillance was conducted on 20/07/2020 by OHD with reg. no. HQ/08/DOC/00/281. 50 chemical operators was send for surveillance and found fit to work. 3. The monitoring of first aid box was conducted by the Medical Assistant on monthly basis. Sighted the monitoring records for box no. 11 and 19 dated 05/04/2021. 	
--	--	---	--

Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.

<p>3.7.1</p>	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units visited has conducted training need analysis for all employee, management and contractors. The need analysis was conducted base on the job designation and training required by the job type.</p> <p>Trainings was identified for management, employee and contractors and programmed throughout FY 2020 and 2021. The training identified covers the safety and health, environmental and social aspect.</p> <p>Additionally, for contractors, there are 8 trainings such as OHS, discipline and waste management incorporated, and it being briefed before starts any works and recorded in Permit to Work. Reviewed the Permit to Work (for General Works) for replacement weighbridge works by Teras Integrasi dated 12/04/2021, refer PTW no. 1094.</p>	<p>Complied</p>
<p>3.7.2</p>	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>The operating units maintained the training records conducted. Reviewed the training records as follows:</p> <p>Bukit Puteri POM</p> <ol style="list-style-type: none"> 1. First Aid training dated 31/03/2021 2. Chemical safety handling dated 16/02/2021 3. Hearing conservation training dated 18/01/2021 4. Policy briefing dated 11/01/2021 5. Basic occupational first aid training dated 11/01/2021 6. LOTO system training dated 18/12/2020 7. Process SOP and Safety training dated 12/10/2020 8. Fire drill training dated 18/08/2020 9. LOTO and Thresher Maintenance training dated 20/07/2020 10. Fire drill training dated 18/06/2020 	<p>Complied</p>

		<p>Bukit Puteri Estate</p> <ol style="list-style-type: none"> 1. Harvester PPE usage refresher training dated 13/10/2020 2. Induction refresher COBC/Policy, RSPO, MSPO and and ERP training dated 24/03/2021 3. SOP for tractor maintenance training dated 10/03/2021 4. Allion spraying training dated 28/01/2021 5. SOP for palm racking training dated 19/02/2021 6. SOP for manuring training dated 26/02/2021 7. SOP for rat baiting training dated 06/03/2021 8. First Aid training dated 30/01/2020 9. Spraying techniques and safety aspects and maintenance of Inter Sprayer dated 19/02/2020 10. Noise exposure requirement 2019 training dated 05/08/2020 11. IPM training dated 09/01/2020 	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Relevant personnel to supply chain implementation as defined by the OU are the personnel that involve in supply chain implementation such as Assistant Managers, QA, clerk, lab supervisor & assistant, weighbridge operators and auxiliary police. The latest RSPO SCCS training was carried out as follows:</p> <ol style="list-style-type: none"> 1. RSPO/MSPO SCCS training – 16/3/20 (trainer – GSM HQ) 	Complied
<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the</p>	<p>Bukit Puteri POM is under mass balance module. Thus, this indicator is not applicable.</p>	Not Applicable

	<p>RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>		
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>Bukit Puteri POM receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</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 forecasted FFB that could be process in the next license period is 28,000 with estimated OER of 20.9% and KER of 4.5%.</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>No RSPO MB products transaction for the last review period.</p>	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 Standard Operation Procedure for Sustainable Supply Chain and Traceability ver. 2 dated April 2019 has documented the procedure to implement the supply chain requirements.</p> <p>The person having the overall responsibility and authority over the implementation of the supply chain requirement is Head of</p>	Complied

	<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>Operating unit. For this certification unit, the Head of Operation has appointed the Assistant Engineer to manage the supply chain implementation.</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>Addressed in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 18.0 Internal Audit. Based on the procedure, the internal audit is to be conducted annually as per Internal Audit Procedure. Refer SOP ref. no. SD/SDP/PSQM/IAP.</p> <p>Combined internal audit for supply chain was last conducted on 163/2021 by 3 internal auditors from Group Sustainability and Quality Management Department. 2 non-conformities was raised for RSPO SCCS during the internal audit. The results of Internal Audit were discussed in the Management Review Meeting as sighted in minutes meeting conducted on 30/3/2021.</p>	<p>Complied</p>
<p>3.8.7</p>	<p>Purchasing and Goods In</p>	<p>When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in</p>	<p>Complied</p>

	<p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>order the FFB to be received by the mill. E.g. of information available in the DO is as follows:</p> <ul style="list-style-type: none"> • Consignment note no. (134157) • Estate’s names (Bukit Puteri Estate) • Date & time of delivery (14/4/21) • Field No. (14A) • No. of bunches (525 bunches) • Vehicle no. (L8-B29) • Net weight (5.52 mt) <p>In estate’s consignment note, details of RPPO certificate number available for verification. RSPO cert. no. (MUTU-RSPO/091)</p> <p>E.g. of information available in the mill’s weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> • Name of estates (Bukit Puteri Estate) • Field No. (14A) • Vehicle no. (L8-B29) • Date (14/4/2021) • Total bunches (525 bunches) • Net weight 5.52 mt <p>Diversion from SOU11 (Kerdau POM certification unit) estates;</p> <ul style="list-style-type: none"> • Consignment note no. (9970) • Estate’s names (Sg Mai Estate) • Date & time of delivery (19/10/20) • Field No. (02S) 	
--	---	--	--

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<ul style="list-style-type: none"> • No. of bunches (900 bunches) • Vehicle no. (BKS 2243) • Net weight (24.62 mt) <p>RSPO certificate no.: MUTU-RSPO/094</p> <ul style="list-style-type: none"> • Consignment note no. (124742) • Estate’s names (Kerdau Estate) • Date & time of delivery (19/10/20) • Field No. (20A1, 20B and 20D) • No. of bunches (1620 bunches) • Vehicle no. (CCC465) • Net weight (24.14 mt) <p>RSPO certificate no.: MUTU-RSPO/094</p> <p>Addressed in the SOP clause 10.0 Non-conforming Products and/or Documents. Based on the procedure, where there is contamination of RSPO certified material during receiving, processing, storage and dispatch, the mill shall downgrade the materials in such order: MB to conventional.</p>	
3.8.8	<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> <p>a) The name and address of the buyer;</p>	<p>Bukit Puteri POM ensured the required information is available in document form as below:</p> <p><u>RSPO CPO MB</u></p> <ul style="list-style-type: none"> a) The name and address of the buyer – XXX b) The name and address of the seller – KKS Bukit Puteri POM c) The loading or shipment / delivery date; 6/1/21 d) The date on which the documents were issued; dispatch ticket 	Complied

	<ul style="list-style-type: none"> b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<ul style="list-style-type: none"> (004912), dated 6/1/2021 e) RSPO certificate number – non certified product despatched f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); non-RSPO g) The quantity of the products delivered; 39.16 mt h) Any related transport documentation; contract no. S/CCE/2012/CPO0002A i) A unique identification number: N/A 	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> 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 ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes 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. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 	<p>Mill is not outsourcing any of mill activities. The independent third parties involve in Mill operation is only transportation services for CPO and PK. Sighted the agreement between Bukit Puteri POM and all suppliers and contractors dated 18/12/20. Mentioned that all contractor needs to follow RSPO/MSPO/SCCS requirements in accordance with the Sime Darby Plantation Bhd Management System and additional from that, all contractor shall ensure to reserve the right of the certification body to audit the outsourcing activities and ensure to provide relevant access for duly accredited CBs to your respective operations, systems and any and all information when this is announced in advance. Refer clause 5 (a) of the contract agreement. Sighted that Nashreena International Sdn Bhd has signed the agreement on 12/12/2020, ref: T/SDP/PEN/CPO/0720/003</p>	<p>Complied</p>

	d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.		
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 list of outsourced contractors was sighted, "list of stakeholders" to include the transport contractor for CPO and PK (Nashreena International Sdn Bhd). The independent third parties involve in Mill operation is only transportation services for CPO and PK	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.	No new contractor used for the processing or physical handling of RSPO certified oil palm products (transportation).	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p>	<p>Accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements available for verification. As spelt out in its supply chain procedure, Clause 5.4, records are to be maintained minimum of two years.</p> <p>For mass balance module;</p> <p>i) Receipt of RSPO certified FFB and deliveries of RSPO certified CPO and PK on three-monthly basis. Based on balance sheet closing March 2021, OER recorded at 20.72% and KER at 4.45%.</p> <p>ii) Volume of certified CPO and PK delivered from the material accounting system according to actual production performance conversion ratios (OER and KER)</p>	Complied

	<p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.</p>	<p>iii) Based on mass balance sheet (March 2021 closing), no negative stock recorded.</p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The oil extraction rate (OER) and the kernel extraction rate (KER) for Bukit Puteri POM is determined and set their own extraction rates based upon past experience, documented and applied consistently.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>For the last review period, OER and KER: 20.97% and 4.54% reported from September to March 2021.</p>	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>This indicator is not applicable</p>	Not Applicable
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>Shipping Announcement in the RSPO IT platform carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not within three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p>	Complied

	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.		
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>	There is no claim on RSPO SCCS used in Bukit Puteri POM	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Bukit Puteri POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. <p>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.</p>	Not applicable as no off-product claim made by Bukit Puteri POM as to date.	Not Applicable
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable as no off-product claim made by Bukit Puteri POM as to date.	Not Applicable
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable as no off-product claim made by Bukit Puteri POM as to date.	Not Applicable

4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Bukit Puteri POM and verified through document and site review (notice board, business card, shipping documentation, 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 was 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.	As per interview with weighbridge operator, she said that the weighbridge ticket will be stated the info i.e: product/commodity with SCC model (Crude Palm Oil RSPO MB) and will stamp the RSPO certificate number. Verified the documents found that the supply chain model and certificate number were stated on the ticket.	Complied
5.3	<p>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:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	Bukit Puteri POM was not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable
Business to consumer communication			

6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	Bukit Puteri POM did not use business to consumer communication. Therefore, this requirement was not applicable.	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.	Bukit Puteri POM did not use business to consumer communication. Therefore, this requirement was not applicable.	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.	Bukit Puteri POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Bukit Puteri POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Bukit Puteri POM did not use business to consumer communication. Therefore, this requirement was not applicable.	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.	Bukit Puteri POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Bukit Puteri POM did not use business to consumer communication. Therefore, this requirement was not applicable.	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	Bukit Puteri POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable

	<p>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.rsपो.org.</p>		
<p>MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES</p>			
<p>Certified oil palm content (IP)</p>			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>Not applicable. Bukit Puteri POM is under mass balance.</p>	<p>Not Applicable</p>
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>Not applicable. Bukit Puteri POM is under mass balance.</p>	<p>Not Applicable</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>Not applicable. Bukit Puteri POM is under mass balance.</p>	<p>Not Applicable</p>
<p>Labelling and trademark (IP)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack 	<p>Not applicable. Bukit Puteri POM is under mass balance.</p>	<p>Not Applicable</p>

	communications, the RSPO trademark can be printed anywhere on the pack.		
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	Not applicable. Bukit Puteri POM is under mass balance.	Not Applicable
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	Sime Darby Plantation has established Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC). The HRC was last revised on August 2020. They promote	Complied

	- Critical (Major) compliance -	the human rights, safeguard democracy and its institutions and not violate the rights of others. They also recognize the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, they are committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as respond to complaints on any alleged threats made to them. Refer to Policy on the Protection of Human Rights Defenders (HRDs) dated 25/03/2020 for more information. Policy on the Protection of HRDs FINAL.pdf (sime-darbyplantation.com) . The policies were communicated to stakeholders during stakeholder meetings. Besides, the briefing of the policies was conducted on 11/01/2021 in Bukit Puteri Oil Mill and 24-25/03/2021 in Bukit Puteri Estate.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	Sime Darby Plantation prohibits any form of harassment in their operation as per the policies above. Interviewed with the workers confirmed that no harassment by the management.	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they believe everyone has the responsibility to promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognise the important role Human Rights Defenders, whistleblowers, complainants and community spokespersons play by lodging complaints in confidence.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial	Complied

	<p>- Minor compliance -</p>	<p>negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in https://www.simedarbyplantation.com/corporate/whistleblowing. Besides, the company has implemented "Suara Kami" as a platform for the workers to raise any issue. The workers in Bukit Puteri Oil Mill were briefed on the complaint mechanism during morning muster. Besides, external stakeholders were briefed during the stakeholder meeting. Interviewed with the internal and external stakeholders confirmed that they have been briefed and understood on the complaint mechanism implemented by the company.</p>	
<p>4.2.3</p>	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Bukit Puteri Oil Mill and Bukit Puteri Estate has implemented Internal & External Complaint Book and Housing Defect Record to record any complaints from internal and external stakeholders. Sampled of the complaints as below:</p> <ol style="list-style-type: none"> 1. House No.: D5 dated 23/01/2021 Issue: Door of the bedroom 1 was broken. Status: Repaired work was carried out by the carpenter and the complainant has acknowledged after action taken. Interviewed with the complainant confirmed that complaint has been resolved. 2. Issue: Workers complaint on the payment of Contract for Services (CFS) has yet to be received for February 2021 on 04/03/2021. Status: The management informed the workers that the supporting documents were insufficient to submit to Zone 	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		Office. The Zone Office has made payment on 06/03/2021 and seen the invoice of payment with DO# 4000002262. Interviewed with the affected workers confirmed that the payment was made accordingly.	
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in https://www.simedarbyplantation.com/corporate/whistleblowing . Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	The mill and estates' management have made contribution to the local communities based on the requests from stakeholders such as the local community requested to borrow backhoe from the estate for the <i>gotong-royong</i> activity. The management has approved for the request. The company also subsidized school bus transportation for the children of workers. The estate's management has donated foods to the children in the kindergarten.	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>Bukit Puteri Oil Mill is located on the land of Bukit Puteri Estate under Land Title# HSD 30, Lot No.: PT 856.</p> <p>There are total 7 land titles in Bukit Puteri Estate and the estate able to show legal ownership on the use of land. Sampled the land title as below:</p> <ol style="list-style-type: none"> 1. Land title No.: 238; Lot No.: PT 1277; 728.433 hectares 2. Land title No.: 30; Lot No.: PT 856; 809.37 hectares 	Complied
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</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> <p>Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.</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>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> <p>Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.</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>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> <p>Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.</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>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
4.4.3	<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>There is no land dispute recorded. Boundary stone was identified and marked in the GPS surveyed map. Trenches were available to demarcate the boundary and this has confirmed by interviewed with the neighbouring smallholder and local community.</p>	Complied
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>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

4.4.5	<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>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
4.4.6	<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>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
<p>Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	Complied
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples.</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	Complied

	Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -		
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
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.	Complied

<p>Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p>	Not Applicable
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. - Critical (Major) compliance -</p>	<p>SOP as per indicator 4.6.1.</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. - Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
<p>Criterion 4.7: 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. - Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p>	Complied
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -</p>	<p>SOP as per indicator 4.7.1.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -</p>	<p>There was no community that have lost access and rights to land for plantation expansion as the operating units expands the planting area under certified area.</p>	Complied
<p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - 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</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.</p>	Complied

	involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	Boundary stone and trenches were available to demarcate the boundary of land.	
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	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
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 -	Current and previous FFB prices available as per MPOB 1% Price Summary. Seen the pricing as below: i. January 2021 – RM 40.07/ % ii. February 2021 – RM 41.22/ % iii. March 2021 – RM 42.92/ % The pricing was displayed at the weighbridge station.	Complied
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).	The FFB suppliers will be briefed on the pricing mechanism prior they sign on the agreement with the company. The pricing mechanism has included in their agreement under Third Schedule.	Complied

	- Critical (Major) compliance -	Interviewed with the FFB supplier confirmed that he has been briefed and understood the pricing mechanism.	
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Fair pricing calculated based on MPOB pricing as specified in individual agreements of FFB supply with the mill.	Complied
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	There was a OCP Engagement Program conducted on 29/03/2021 to involve the smallholders and collection centre to explain the sustainability and RSG to the smallholders. The program has involved MPOB officers to explain on the certification as well.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	The third party FFB suppliers have signed on the agreement prior to deliver the FFB to the mill. Sampled of the agreement as below: <ul style="list-style-type: none"> i. Agreement No.: P/C/1220/FFB02547L dated 01/01/2021 ii. Agreement No.: P/C/1220/FFB02550L dated 01/01/2021 iii. Agreement No.: P/C/1220/FFB02548L dated 01/01/2021 The payment term was outlined in the agreement where there will be two payments, advanced payment and final payment. The final payment will be made to the FFB suppliers on or before the 10 th day of the following month. The pricing mechanism has detailed out in Third Schedule of the agreement. Interviewed with the FFB supplier confirmed that they understood the pricing mechanism and this mechanism has explained to them by the representative from OCP Department from HQ.	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	The payment of FFB suppliers was carried out by HQ and sampled the payment records as below:	Complied

		<ul style="list-style-type: none"> i. Vendor: 1001008187 dated 31/01/2021; Payment made on 08/02/2021. ii. Vendor: 1001010715 dated 31/01/2021; Payment made on 08/02/2021. iii. Vendor: 1001010773 dated 31/01/2021; Payment made on 08/02/2021. iv. Vendor: 1001008187 dated 28/02/2021; Payment made on 08/03/2021. v. Vendor: 1001010715 dated 28/02/2021; Payment made on 08/03/2021. vi. Vendor: 1001010773 dated 28/02/2021; Payment made on 08/03/2021. 	
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>The mill and estate conducted the weighbridge calibration on annually basis base on applicable laws and regulations. Reviewed the latest calibration and stamping as follows:</p> <ol style="list-style-type: none"> 1. Bukit Puteri POM with serial no. B737684825 with safety sticker no. DE17001267 dated 14/01/2021. 2. Bukit Puteri Estate weighbridge serial no. 01479066CP with safety sticker no. DE18003866 dated 31/03/2021 	Complied
5.1.8	<p>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.</p> <p>- Minor compliance -</p>	<p>The mill brief to the smallholders who supplied FFB to the mill on the benefits of certification and Responsible Sourcing Guideline during Outside FFB Purchase (OCP) engagement. Latest engagement was conducted on 29/03/2021.</p>	Complied

5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>There was no grievance received from external FFB suppliers since the last audit. Sime Darby Plantation Mill Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 1, issue date 01/04/2008) established to handle if there is any external complaint. Interviewed with the FFB supplier and he is able to show the understanding on the complaint mechanism.</p>	Complied
<p>Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
5.2.1	<p>The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>There was a OCP Engagement Program conducted on 29/03/2021 to involve the smallholders and collection centre to explain the sustainability and RSG to the smallholders. The program has involved MPOB officers to explain on the certification as well.</p>	Complied
5.2.2	<p>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).</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation as a group has developed Standard Operating Procedure for Responsible Sourcing Guidelines (RSG) with Doc. No.: SD/SDP/GS/001 dated June 2020 in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers. There was a OCP Engagement Program conducted on 29/03/2021 to involve the smallholders and collection centre to explain the sustainability and RSG to the smallholders.</p>	Complied
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.</p> <p>Group Sustainability Department, Sustainability Compliance Unit has conducted Desktop Review Assessment for New OCP suppliers on</p>	Complied

		29/09/2020 to check on the compliance of no planting on peat and forest reserve. There was a OCP Engagement Program conducted on 29/03/2021 to involve the smallholders and collection centre to explain the sustainability and RSG to the smallholders.	
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	No independent smallholders within SOU 10 Bukit Puteri POM certification unit	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	No independent smallholders within SOU 10 Bukit Puteri POM certification unit	Complied
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter to ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at work and providing a platform for workers' voice and social dialogue. They respect the rights of workers and provide fair and favourable working conditions by Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. They will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy could be downloaded from https://www.simedarbyplantation.com/sustainability/human-rights-charter .	Complied

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>	<p>Interviewed with the workers comprises of different gender and nationalities as well as the parolees confirmed that no discrimination has reported. The management treated all equally such as provided free accommodation and medical to all the workers, no charging of recruitment fees for the foreign workers and offered job based on capability. The worker can request for job transfer if they found they unfit for the job assigned to them.</p>	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>	<p>Sime Darby Plantation has developed a Career Progression for Workers Level (both local and foreign workers), Doc. No.: SDP/HRUM/2020/SOP01 where the promotion of workers is based on the work performance, suitability, and the leadership quality of the worker. The recruitment of foreign workers is through Human Resource Department in HQ based the regulation requirements.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Interviewed with the female employees in Bukit Puteri Oil Mill and Bukit Puteri Estate confirmed that pregnancy testing is not conducted prior to work. They still will be able to offer for work if they are pregnant.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Gender Committee was established in both Bukit Puteri Oil Mill and Bukit Puteri Estate. Seen the appointment letters of the committee from Bukit Puteri Oil Mill and Bukit Puteri Estate.</p> <p>Gender Committee has organized meeting and the last meetings were conducted on 09/042021 in Bukit Puteri Oil Mill and 08/01/2021 in Bukit Puteri Estate. There was no issue raised in Bukit Puteri Oil Mill and Bukit Puteri Estate. Interviewed with the Chairman of Gender Committee in Bukit Puteri Oil Mill and Bukit Puteri Estate confirmed no case of sexual harassment or violence reported. Activity such as hiking was organized by the committee which involved the family members as well.</p>	Complied

6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>The female workers employed in the mill and estate are local Malaysian. Reviewed total 26 payslips in Bukit Puteri Oil Mill and Bukit Puteri Estate 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. Interviewed with both the female and male workers confirmed that no discrimination has occurred.</p>	Complied
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby has sign the Collective Agreement with National Union of Plantation Workers (NUPW). Sample of employment contracts are reviewed and the agreements are signed in both English and home country language (i.e. Hindi, Bahasa Malaysia/Indonesia). Upon the foreign workers arriving to the estate, they will be inducted for the terms and conditions of employment contract and briefed on the company's policies. This has confirmed by interviewed with the foreign workers.</p>	Complied
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 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>Reviewed total 26 employment contracts in Bukit Puteri Oil Mill and Bukit Puteri Estate, and the contracts are signed in their dual language which is English and their home country language such as Hindi, Bahasa Malaysia/Indonesia. The terms and conditions such as working hours, deduction, overtime, sick leave, holiday entitlement, reason of dismissal and period of notice were outlined in the contract. The extension contract has outlined the terms and condition according to the Employment Act 1955 and Minimum Wage Order 2020. Version of extension contract, "Employment Contract Extension for Foreign Worker (Peninsular – Indonesia/ Nepalese) – ECE1 was sighted.</p>	Complied

<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>26 samples for workers in various operations including mill operators, harvester, field workers and general workers were verified. Overtime was appropriate and deduction was made fairly as per the agreement and approval from the <i>Jabatan Tenaga Kerja</i>.</p> <p>Reviewed the Employee Allowances and Deduction Details of March 2021 in Bukit Puteri Oil Mill found 3 workers who is union member have made the deduction of wages for RM 11 for the union membership fees since they joined on 01/02/2019. There was no reimbursement of RM 3 made to the worker as per MAPA/NUPW Circular No. 22/2015 dated 4/8/2015. The sampled of workers as below:</p> <ol style="list-style-type: none"> 1. Employee No.: 139076 2. Employee No.: 139299 3. Employee No.: 146950 <p>Thus, a major NC was raised.</p>	<p>Non-compliance</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 upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>The workers live in the housing complex of the mill and estate are provided with free housing facilities and water supply, subsidized of electric supply and medical support.</p> <p>Linesite inspection was conducted weekly by the Assistant Manager in Bukit Puteri Oil Mill using the Housing Complex/ Nest/ Community Hall Weekly Inspection Checklists. The las inspection was conducted on 09/04/2021 in Bukit Puteri Oil Mill. Any issues found during the inspection was remarked in the checklist and action will be taken accordingly. There was a quarterly Housing Unit Inspection (EWR) carried out by the Employees Welfare Committee. The inspection was carried out on 09/04/2021. The Assistant Manager of Bukit Puteri Oil Mill has established a list of housing defects on 26/03/2021 and action plan for the housing repair was developed.</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>Budget of total RM 3,000 for housing repair was allocated. The repair work should be completed by June 2021 as per planned.</p> <p>Medical Assistant of Bukit Puteri Estate has conducted linesite inspection in both Division A and Division B. The last inspection was carried out on 05/04/2021. The only concern was the drainage not well maintained and free from obstacles where the management is in the progress to upkeep the drainage. The company has the difficulties in purchasing sand for the repair work due to limited license issued by the authority to the seller.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>All the workers have provided with 10kg of rice once every two months as per company's policy. Seen the records of distribution of rice for January 2021. Interviewed with the workers confirmed that they are easily access to adequate, sufficient and affordable foods where the mill and estate are neighbouring to the small town where they can easily access.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p>	<p>SOU 10 Bukit Puteri has established the prevailing wage calculation to include all the in-kind benefits provided to the workers. Sampled the prevailing wages for benefit of Maintenance & utilities – RM 67.53 for local workers and foreign workers, creche maintenance cost - RM 23.22 for local workers and phone reload – RM 5 for both local workers and foreign workers. The prevailing wages is more than the Minimum Wage Order 2020.</p>	Complied

	<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. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p>	<p>All the core works are performed by permanent and full-time employees in SOU 10 Bukit Puteri Oil Mill and supply bases. No contract worker was employed. The estate has appointed contractor</p>	<p>Complied</p>

	- Minor compliance -	for FFB transporter and the workers are permanently working in the estate.	
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.			
6.3.1	(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. - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter where they respect Freedom of Association by respecting the rights of employees to form and join unions and bargain collectively. In jurisdictions where this right is limited, they will provide alternative means of employee engagement and grievance redressal. The policy was communicated to the workers conducted on 11/01/2021 in Bukit Puteri Oil Mill and 24-25/03/2021 in Bukit Puteri Estate.	Complied
6.3.2	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. - Minor compliance -	NUPW Committee was established in Bukit Puteri Oil Mill and the last meeting was conducted on 07/04/2020. Issues were raised during the meeting and recorded in the meeting minutes. Management plan was developed for the issues raised by the NUPW representatives and action has been taken accordingly. Interviewed with the NUPW representatives confirmed that the issues raised during the meeting were resolved. He informed that there is no any further pending issue reported during the time of audit. There is NUPW committee established in Bukit Puteri Estate and meeting was carried out with the management to discuss workers' issues. The last meeting was conducted on 15/09/2020. Meeting minutes was sighted. There was no issue raised during the meeting. Only request from the representative to organize more social activities.	Complied

6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Interviewed with the NUPW representatives and the workers confirmed that the election of the representatives were elected freely by the workers without any interference of management.</p>	Complied
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>Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They recognize that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography. They are eradicating child labour in all their supply chain and not employ anyone underage of 18 years.</p> <p>All the contractors have to read through Vendor COBC before they signed on the Vendor Integrity Pledge. Under Clause 5.8, vendor shall not employ anyone under the age of 18 or the applicable minimum legal age in the countries they operate.</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>Workforce Management Unit has developed SOPP under Clause 3.1.13 LR13 – Recruitment Drive & Interview/ Selection of Foreign Workers where the minimum requirement of the age is 18 years old. Besides, Guideline on the Recruitment of Local Workers dated 07/12/2020 has stated the applicant of workers must be above 18 years of age. Age screening is based on identification documents and/ or passport and from the stated date of birth. The local employees have to submit a photocopy of identification card during</p>	Complied

		application of job to the management for verification purpose. Verified the records in the New Recruitment's file.	
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Employee Master Listing and through interviewed with the stakeholders.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	The management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders.	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter where they create a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict. The policy was communicated to the workers conducted on 11/01/2021 in Bukit Puteri Oil Mill and 24-25/03/2021 in Bukit Puteri Estate.	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They facilitate opportunities for advancement for their employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights.	Complied

		The policies were communicated to workers on 11/01/2021 in Bukit Puteri Oil Mill. Gender Committee of Bukit Puteri Estate has conducted briefing to the female workers on 03/04/2021 related to the sexual harassment and reproductive rights. Seen the training attendance list. The workers have to answer quiz to ensure their understanding on the training.	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Briefing of the new mother assessment was conducted during the Gender Committee meeting in Bukit Puteri Oil Mill and Bukit Puteri Estate.</p> <p>As of 12/04/2021, there was no new mother in Bukit Puteri Oil Mill verified through interviewed with the Chairman of Gender Committee and female workers.</p> <p>There was assessment for new mothers conducted on 03/15/06/2020 and 09/08/202 in Bukit Puteri Estate for new mothers who are pregnant for 2 months and 1 month. They do not have specific needs during their pregnancy period. Interviewed with the both mothers confirmed that the committee has consulted their needs as a new mother.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has developed Gender Committee Handbook, First Edition for implementation framework and guidelines where grievance reporting procedure for gender was developed. Any cases must be reported to Social & Environment Projects Unit of the PSQM Department. Incident report template was established. Flowchart and Procedure on Handling Social Issues, version 1, dated 01/11/2008 was implemented as well. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in</p>	Complied

		<p>http://www.simedarbyplantation.com/corporate/governance/whistleblowing. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p> <p>A Complaint Form for sexual harassment was implemented in Bukit Puteri Oil Mill to monitor if there is any cases reported.</p>	
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Interviewed with the workers confirmed that no forced and trafficked labour in SOU 10 Bukit Puteri. The Indian workers informed that they did not pay any recruitment fee to agent as they employed directly by Sime Darby. The terms and conditions offered by the company were similar in their home country and when arrived in the plantations. No contract substitution has occurred. They keep their passport at the Passport Locker near the Security Post. They can access to the passport freely. Overtimes was monitored by the company and the workers are giving freedom to choose to overtime and resign. There was no penalty for termination of employment if they wish to terminate the contract earlier as per the employment contract signed.</p> <p>If the workers in the mill who want to work for overtime, they will need to fill in the Overtime Details form. Those who worked on rest day and public holiday is required to fill in the application form <i>Kerja/ Kerja lebih masa pada hari rehat & Kerja/ kerja lebih masa pada hari cuti am</i>. Approval from the Supervisor and Assistant is required.</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB has implemented a Sime Darby's Human Rights Charter revised 2020 and can be easily access via www.simedarbyplantation.com where they committed as below:</p> <ul style="list-style-type: none"> a) Providing equal opportunity b) Respecting freedom of association c) Eradicating any form of exploitation d) Providing decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs e) Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution. <p>All the foreign workers will be provided with induction training prior to work. Besides, they were provided with decent living condition and free from any discrimination. The workers informed that they were treated equally without any discrimination and allow joining NUPW freely. No contract substitution has occurred through interviewed with the workers.</p>	Complied
<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>			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The Estate and Mill Manager in SOU 10 has been appointed as Person Responsible / Chairman for Safety and Health in the estate as per appointment letter signed by the Regional General Manager Central East Region dated 01/01/2021.</p> <p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate/Mill Manager. The OSH committee discussed regarding the</p>	Complied

safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the agenda as follows:

1. Workplace inspection
2. Current OSH performance
 - a. Accident reports
 - b. SIMECARD reports
 - c. Compliance to law and regulations
 - d. HIRARC review
 - e. PSQM-ESH assessment
 - f. GCAD-ESH audit
 - g. Safety compliance by contractors
 - h. OSH/MA/Others visit
 - i. OSH Program
 - j. Medical surveillance/Audiometric test results
3. Other matters

Reviewed the minutes meeting conducted as follows:

	1	2	3	4
Bukit Puteri POM	27/01/2020	Not conducted due to MCO as per email dated	23/07/2020	28/10/2020

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

				17/04/2020 by RSQM			
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>	Bukit Puteri Estate	07/01/2020	25/06/2020	07/08/2020	01/10/2020	Complied
		<p>FY 2021, latest meeting was conducted on 27/01/2021 for Bukit Puteri POM and 16/03/2021 for Bukit Puteri Estate.</p>					
		<p>Accident of emergency procedure is presented in Mill Quality Management System Standard Operation manual (MQMS SOM) dated November 1st, 2008. Flowchart of emergency handling was presented in Appendix 5.5.3.3.</p> <p>Bukit Puteri POM</p> <p>The mill has established emergency response team lead by the mill manager. The team were divided into Safety Audit, Accident Investigation, First Aider, Fire Fighting and Flood/Oil Spillage.</p> <p>The mill has established map for first aid, fire hydrant and fire extinguisher location in the mill.</p> <p>Competent first aider were present at the mill as per certificate no. BOFA/19/00410 and BOFA/19/00411 valid till 13/03/2022.</p> <p>Bukit Puteri Estate</p> <p>The estate has established emergency response team with the Estate Manager act as Commander. The team were divided into Division A team, Division B team, First Aider, Fire, Flood, Spillage and Rescue and Search.</p> <p>The estate has provided 16 first aid box which placed at several work station and given to field mandore. The monitoring of first aid</p>					

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		box was conducted by the Medical Assistant on monthly basis. Sighted the monitoring records for box no. 11 and 19 dated 05/04/2021.	
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>- Critical (Major) compliance -</p>	<p>The mill and estates visited provided appropriate PPE to all workers according to the job type. The PPE given as per HIRARC and Pictorial Safety Standard (PSS) dated 17/3/2008.</p> <p><u>Bukit Puteri POM</u></p> <p>The mill records all PPE provided to the employee in PPE Records Book. Reviewed the PPE records since 2019 for employee with ID no. 23183, 148578, 148576, 23178, 23197, 23221, 148580 and 23235.</p> <p>During site, noted that the employee was not wearing ear plug when working at Kernel Plant and backhoe driver was not wearing safety helmet during working at FFB reception area.</p> <p><u>Bukit Puteri Estate</u></p> <p>The estate records all PPE provided to the employee in PPE Record/Toolbook. Reviewed PPE issue records for workers with ID no. 113961, 144898, 149084, 155256 and 149077.</p> <p>During site visit, it was sighted 2 harvester riding motorbike and tractor driver not wearing safety helmet.</p> <p>With the above non-compliances, thus major NC was issued.</p>	Non-compliance
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 is provided to all the employees. Reviewed on workers profile records found that all workers are covered by the accident insurances.</p> <p><u>Bukit Puteri POM</u></p> <p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Reviewed the form 8A, "Jadual</p>	Complied

		<p>Caruman” for contribution for the month of January and February 2021 for 75 employee and March 2021 for 76 employee.</p> <p><u>Bukit Puteri Estate</u></p> <p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Reviewed the form 8A, “Jadual Caruman” for contributionFY 2021 for the month of January for 297 employee, February for 289 employee and March for 275 employee.</p>										
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Records of all accidents are kept and recorded in OSH Performance Monthly Report and reported to RSQM on monthly basis. Reviewed the monthly report for the month of November and December 2020, January, February and March 2021.</p> <p>Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems. Reviewed the samples of accident statistic FY 2020 as reported to DOSH as follows:</p> <table border="1"> <thead> <tr> <th>Operating units</th> <th>Accident Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Bukit Puteri POM</td> <td>0</td> <td>0</td> </tr> <tr> <td>Bukit Puteri Estate</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	Operating units	Accident Cases	LTA	Bukit Puteri POM	0	0	Bukit Puteri Estate	0	0	Complied
Operating units	Accident Cases	LTA										
Bukit Puteri POM	0	0										
Bukit Puteri Estate	0	0										
Principle 7: Protect, conserve and enhance ecosystems and the environment												
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.												
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the	Complied									

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>- Critical (Major) compliance -</p>	<p>plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators.</p> <p>The estate has established IPM program. The plan was reviewed on annually basis. among the IPM plant established:</p> <ol style="list-style-type: none"> 1. To increase plant beneficial plant ratio per ha 1dm: 1ha to 2 dm: 1 ha 2. To increase ratio BOB from 1:13 ha and gradually to 1:10 ha 3. To chipping trunk below 10 cm in order to avoid breeding of Rhino Beetle 4. Single layer EFB Mulching to avoid breeding of Rhino Beetle <p>Reviewed the implementation records as follows:</p> <ol style="list-style-type: none"> 1. Latest barn owl census was conducted in March 2021. The ratio of barn owl box was recorded at 1: 12.82 ha with occupancy rate at 50% <p>The estate continuously planting beneficial plant such as Tunera subulata, Cassia cobanensis, Antigonan leptopus. The ratio of beneficial plant planted recorded at 110 dm/ha for division A, 15 dm/ha for division B and 75 dm/ha for division C.</p>	
<p>7.1.2</p>	<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>In SOU 10, 3 plant species were used for IPM such as Tunera subulata, Cassia cobanensis, and Antigonan leptopus.</p>	<p>Complied</p>
<p>7.1.3</p>	<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>No evidence and records of fire usage for pest control at all estate visited.</p> <p>Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on</p>	<p>Complied</p>

	<p>- Minor compliance -</p>	<p>2/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest:</p> <p>"We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:</p> <p>ix. Zero tolerance of the use of fire within our land boundaries and conservation areas, and the establishment of effective monitoring and prevention systems, as well as protective firefighting measures in and around our operation."</p>	
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
<p>7.2.1</p>	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 1/7/2011. Selected products are specific to the target pest, weed and disease. Some of recommended pesticides are:</p> <p>Immature planting (sample)</p> <p>i. General weeds : Glyphosate</p> <p>ii. Pennisetum polystachion : Metsulfuron Methyl</p> <p>iii. Stenochlaena palustris : Sodium chlorate</p> <p>Mature planting</p> <p>i. Grass weed and Asystasia : glyphosate & 2,4-D amine</p> <p>The selection is also evaluated by the agronomist during his visit to the estate</p>	<p>Complied</p>
<p>7.2.2</p>	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate.</p>	<p>Complied</p>

		<p>Sighted the sampled records of pesticides usage per ha at estate visited as follows:</p> <table border="1" data-bbox="1137 450 1688 1098"> <thead> <tr> <th>Month</th> <th>2020</th> <th>2021</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>0.272</td> <td>0.174</td> </tr> <tr> <td>February</td> <td>0.292</td> <td>0.181</td> </tr> <tr> <td>March</td> <td>0.185</td> <td>0.192</td> </tr> <tr> <td>April</td> <td>0.164</td> <td>-</td> </tr> <tr> <td>May</td> <td>0.113</td> <td>-</td> </tr> <tr> <td>June</td> <td>0.140</td> <td>-</td> </tr> <tr> <td>July</td> <td>0.155</td> <td>-</td> </tr> <tr> <td>August</td> <td>0.243</td> <td>-</td> </tr> <tr> <td>September</td> <td>0.219</td> <td>-</td> </tr> <tr> <td>October</td> <td>0.370</td> <td>-</td> </tr> <tr> <td>November</td> <td>0.213</td> <td>-</td> </tr> <tr> <td>December</td> <td>0.194</td> <td>-</td> </tr> </tbody> </table>	Month	2020	2021	January	0.272	0.174	February	0.292	0.181	March	0.185	0.192	April	0.164	-	May	0.113	-	June	0.140	-	July	0.155	-	August	0.243	-	September	0.219	-	October	0.370	-	November	0.213	-	December	0.194	-	
Month	2020	2021																																								
January	0.272	0.174																																								
February	0.292	0.181																																								
March	0.185	0.192																																								
April	0.164	-																																								
May	0.113	-																																								
June	0.140	-																																								
July	0.155	-																																								
August	0.243	-																																								
September	0.219	-																																								
October	0.370	-																																								
November	0.213	-																																								
December	0.194	-																																								
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5.</p> <p>The estates visited has established management plan to reduce chemical usage FY 2020. The mitigation plan include:</p>	Complied																																							

		<ol style="list-style-type: none"> 1. To increase plant beneficial plant ratio per ha 1dm: 1ha to 2 dm: 1 ha 2. To increase ratio BOB from 1:13 ha and gradually to 1:10 ha 3. To chipping trunk below 10 cm in order to avoid breeding of Rhino Beetle 4. Single layer EFB Mulching to avoid breeding of Rhino Beetle 	
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>No evidence of prophylactic use of pesticides in the estates visited as per Register of Chemicals Hazardous to Health dated 01/01/2021.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ol style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.3: Protect and disclose environmental impacts and minimise resource use stated:</p> <p>'We aim to minimise our foot print and continuously reduce our use of resources through:</p> <ol style="list-style-type: none"> iv. Implementing integrated pest management programs, with no use of paraquat or chemicals classed as hazardous under the WHO 1A. We will phase out the WHO 1B and those additional chemicals listed in the Stockholm or Rotterdam Conventions." <p>Sighted and verified at all estates visited, Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. Based on the latest Register of Chemicals Hazardous to</p>	Complied

		Health dated 01/01/2021, only class II, III & IV chemical used at visited estates.	
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>The pesticides operators has been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly health surveillance done by the Medical Assistant.</p> <p>Reviewed the training records as follows:</p> <ol style="list-style-type: none"> 1. Allion spraying training dated 28/01/2021 2. SOP for rat baiting training dated 06/03/2021 <p>Spraying techniques and safety aspects and maintenance of Inter Sprayer dated 19/02/2020</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Empty pesticides containers were reused for chemical premixing operation.</p> <p>For containers which are broken or not used for chemical premixing were stored in designated storage area before disposed through approved scheduled waste disposer.</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 provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>No aerial spray activities conducted in Bukit Puteri Estate</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Latest CHRA was conducted on 10/06/2020 by assessor with registration no. HQ/14/ASS/00/358. Refer report no. HQ/14/ASS/00/00001-2020/13.</p> <p>In the report recommended that workers involved with line site fogging operator, chemical mixing operator, trunk injection gang and workshop welders to attend annual medical surveillance follow the DOSH Medical Surveillance Guideline 2001.</p> <p>For pesticides handlers, the assessor recommend for monthly health surveillance by Medical Assistant with consultation by the VMO is conducted.</p> <p>FY 2020, chemical surveillance was conducted on 20/07/2020 by OHD with reg. no. HQ/08/DOC/00/281. 50 chemical operators was send for surveillance and found fit to work.</p> <p>FY 2021, health surveillance was conducted on monthly basis. Among the health condition monitored during the surveillance was blood pressure, pulse, lung, CVS, skin and eye. Reviewed the Monthly Health Surveillance records for the month of January, February and March 2021.</p>	Complied
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby has established Gender Policy on Motherhood Responsibilities and Reproductive Rights on prohibition of all confirmed pregnant and breast-feeding woman to work with pesticides. The policy has been communicated to the workers through induction training for new workers, morning briefing, iCARE Safety and Health Townhall meeting, and displayed at various notice board within the estate.</p> <p>The estates visited prohibited all confirmed pregnant and breast-feeding woman to work with pesticides as per internal memo signed by the Assistant Manager. The memo has been displayed on the notice board at few strategic place in the estate</p>	Complied

Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.														
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 waste management plan is established under Waste Management Plan FY2021. The waste are categorized as domestic waste, industrial waste, scheduled waste and recyclable waste. Hazardous characteristics study was done by 3rd party accredited laboratory (Kualiti Alam). This study is required as stipulated in mill's compliance schedule. Refer to report ref:KA/(WMC)/EMS/BPOM/17/002 dated 24th August 2017 for a few scheduled waste generated namely SW305, SW306 and SW 322 as to confirm hazardous characteristics of the waste.</p> <p>The collected waste being segregated at the waste collection site for recyclable and non-recyclable. During field assessment at the waste collection centers / landfills, it was observed that all waste are completely buried. No waste scattered at the surrounding area.</p> <p>At waste storage area, it was found that recyclable and hazardous waste were kept separate at designated storage area. Scheduled waste are completely labelled and stored with secondary containment and spill kits. No evidence of spills observed during site visit.</p>		Complied										
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>The disposal of type of waste are as per the waste management plan dated FY 2021. Interview with the waste disposal site workers confirmed that they understand about the waste segregation. For the hazardous waste, disposal waste made by DOE's license contractor.</p> <p>Hazardous waste disposal summary:</p> <table border="1" data-bbox="1137 1270 1930 1378"> <thead> <tr> <th>Waste code</th> <th>Consignment no./ quantity</th> <th>Waste Contractor/ Transporter</th> <th>Date of disposal</th> <th>Estate /mill</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>		Waste code	Consignment no./ quantity	Waste Contractor/ Transporter	Date of disposal	Estate /mill						Complied
Waste code	Consignment no./ quantity	Waste Contractor/ Transporter	Date of disposal	Estate /mill										

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<table border="1"> <tr> <td>SW322 (waste of non-halogenated organic solvents)</td> <td>via eSWiS 2021022616 SRDWKV, 0.2481 mt</td> <td>Kualiti Alam Sdn Bhd</td> <td>20/6/21</td> <td>Bukit Puteri POM</td> </tr> <tr> <td>SW410 (rags, oil filter, papers etc)</td> <td>via eSWiS 2021022616 KBCH50, 0.079 mt</td> <td>Kualiti Alam Sdn Bhd</td> <td>26/2/21</td> <td>Bukit Puteri POM</td> </tr> </table> <p>Based on latest inventory (5th Schedule) dated 12/4/21, only 2 type of waste SW322 (0.0261 mt) and SW409 (0.0105 mt) generated and stored onsite. Inventory and physical stock was found to be tally.</p> <p>Other waste of waste such process/biomass waste (fibre/shell) is being fully optimised for boiler fuel whereas EFB is used for mulching and sent to Bukit Puteri Estate. Recycle waste (scarp iron) was last disposed on December 2020 by Prinzac Trading Sdn Bhd. Total of 18.48 mt of scarp iron collected.</p>	SW322 (waste of non-halogenated organic solvents)	via eSWiS 2021022616 SRDWKV, 0.2481 mt	Kualiti Alam Sdn Bhd	20/6/21	Bukit Puteri POM	SW410 (rags, oil filter, papers etc)	via eSWiS 2021022616 KBCH50, 0.079 mt	Kualiti Alam Sdn Bhd	26/2/21	Bukit Puteri POM	
SW322 (waste of non-halogenated organic solvents)	via eSWiS 2021022616 SRDWKV, 0.2481 mt	Kualiti Alam Sdn Bhd	20/6/21	Bukit Puteri POM									
SW410 (rags, oil filter, papers etc)	via eSWiS 2021022616 KBCH50, 0.079 mt	Kualiti Alam Sdn Bhd	26/2/21	Bukit Puteri POM									
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	Observation from the waste disposal sites could not observe any waste are disposed using open fire. Biodegradable waste are being landfilled while other non-biodegradable and hazardous waste is disposed through licensed disposer.	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 -	Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil	Complied										

		<p>fertility is managed to a level that ensures optimal and sustained yield.</p> <p>The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents;</p> <ul style="list-style-type: none"> a) EQMS chapter B8 - Leguminous Cover Crops b) EQMS chapter B14 – Manuring c) ARM Section 8 – Manuring 	
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>Plant Nutrition and Protection Unit (PNU) prepare the annual fertilizer recommendation base leaf analysis result. Leaf analysis show the nutrient level was used as the guidance for the recommendation.</p> <p>As per company SOP, the soil sampling analysis carried at 5 years interval. The leaf analysis and soil analysis report was made available for review. Latest soil analysis was conducted on 25/03/2019 as per test report no. S44/2019.</p> <p>Latest leaf sampling analysis was carried out in March 2020. The report was stated in the 2020/21 Agronomic and Fertilizer Recommendations Report dated 26/08/2020.</p>	Complied
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>Nutrient recycling strategy is in place and includes use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. The strategy as follows:</p> <ul style="list-style-type: none"> i. EFB applied at selected fields at the estates. ii. Fibre and POM were use as compost material. iii. Palm residues after planting were left in the biomass row to decompose. <p>Sighted the sampled records for EFB application FY 2020as follows:</p>	Complied

		Month	MT	
		Jan 20	635.34	
		Feb 20	863.40	
		Mar 20	884.92	
		Apr 20	1666.48	
		May 20	1349.32	
		Jun 20	1702.87	
		Jul 20	2553.55	
		Aug 20	1679.70	
		Sep 20	1719.41	
		Oct 20	1641.21	
		Nov 20	634.40	
		Dec 20	1115.17	
		Total	16445.77	
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	The estate maintain the records of manuring application as per recommendation by the agronomist. Observed application records as per agronomist recommendation:		Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>Month program: Feb – Mar 2021</p> <p>Field: P17C</p> <p>Ha program: 118.51 ha</p> <p>Type: MOP</p> <p>Rate/palm: 1.75 kg/palm</p> <p>Month completed: 09 - 10/3/2021</p>	<p>Month program: May 2021</p> <p>Field: P98D</p> <p>Ha program: 73.63 ha</p> <p>Type: Kieserite</p> <p>Rate/palm: 1.00 kg/palm</p> <p>Month completed: 09/04/2021</p>	
Criterion 7.5: Practices minimise and control erosion and degradation of soils.				
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Maps identifying marginal and fragile soil, including steep terrain were available for verification. They were prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011.</p> <p>No fragile soil identified in the estate. Among the soil series identified were Chat (77.51%), Bungor (8.18%), Tebok (4.64%), Gajah Mati (2.65%), Gong Chenak (2.63%), Kuala Brang (1.81%), Kerayong (1.03%), Gol (0.84%) and Kuah (0.73%).</p>		Complied
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Sime Darby has established Slope and River Protection Policy signed by the Managing Director dated 15/1/2015. In the policy clearly stated that:</p> <p>i. Slope of >25° must be excluded from any new planting development and replanting program.</p> <p>ii. Slope of <25°, the existing crop and vegetation shall be maintained accordingly.</p> <p>Planting terraces had been constructed where slope >10°. Fields are established with cover crops such as mucuna and soft grasses and ferns.</p>		Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		As sighted at field P15A, area with Slope of >25° were excluded during replanting and signboard has been erected in the area.			
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting conducted at all estates visited.	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 series and topography map available for both estates visited. No fragile soil categorized in the estates visited as per soil map issued by R&D Precision Agriculture Unit. As sighted in estates visited, the estate have taken into account the land terrain, drainage and road systems in planning the 2020 replanting.	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 -	Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest: "We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through: vii. No new development of peat areas, regardless of depth or location. We will seek to rehabilitate existing plantings on peats where possible.	Complied		
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	The R&D Precision Agriculture conducted assessment and provided the estates with topography maps. Sampled topography information at estates visited as follows: <table border="1" data-bbox="1137 1337 1559 1388"> <tr> <td>Elevation</td> <td>%</td> </tr> </table>	Elevation	%	Complied
Elevation	%				

		<table border="1"> <tr> <td>0° - 2°</td> <td>9.07</td> </tr> <tr> <td>2° - 6°</td> <td>29.68</td> </tr> <tr> <td>6° - 12°</td> <td>35.81</td> </tr> <tr> <td>12° - 20°</td> <td>22.50</td> </tr> <tr> <td>20° - 25°</td> <td>2.51</td> </tr> <tr> <td>> 25°</td> <td>0.43</td> </tr> </table>	0° - 2°	9.07	2° - 6°	29.68	6° - 12°	35.81	12° - 20°	22.50	20° - 25°	2.51	> 25°	0.43	
0° - 2°	9.07														
2° - 6°	29.68														
6° - 12°	35.81														
12° - 20°	22.50														
20° - 25°	2.51														
> 25°	0.43														
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.															
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	No planting on peat in the estate as no peat identified as per Soil Map prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. Thus, this indicator is not applicable.	Not Applicable												
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE:</p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	No planting on peat in the estate as no peat identified as per Soil Map prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. Thus, this indicator is not applicable.	Not Applicable												
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	No planting on peat in the estate as no peat identified as per Soil Map prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. Thus, this indicator is not applicable.	Not Applicable												
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	No planting on peat in the estate as no peat identified as per Soil Map prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. Thus, this indicator is not applicable.	Not Applicable												

7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>No planting on peat in the estate as no peat identified as per Soil Map prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. Thus, this indicator is not applicable.</p>	<p>Not Applicable</p>
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>No planting on peat in the estate as no peat identified as per Soil Map prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. Thus, this indicator is not applicable.</p>	<p>Not Applicable</p>
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>No planting on peat in the estate as no peat identified as per Soil Map prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. Thus, this indicator is not applicable.</p>	<p>Not Applicable</p>
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			

<p>7.8.1</p>	<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> <ul style="list-style-type: none"> a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. b) Workers have adequate access to clean water. <p>- Minor compliance -</p>	<p>SOU 10 certification unit had established its Water Management Plan for year 2021 which was developed to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment.</p> <p>Government water is supplied to all housing within the certification unit. Own treated water was also used to support for any shortage of supply. For Bukit Puteri POM, the ratio of supply is 80 (own treated water) : 20 (government water). Monthly domestic water analysis was done to ensure the water quality is safe for human consumption. Latest analysis for the last 3 months summarized as below:</p> <table border="1" data-bbox="1137 742 1926 1257"> <thead> <tr> <th>Month</th> <th>Analysis Result</th> <th>Report reference</th> </tr> </thead> <tbody> <tr> <td>January 2021</td> <td>Raw and treated water: E.Coli & Total Coliform (ND<2)</td> <td>ML195/2021 dated 26/1/21</td> </tr> <tr> <td>February 2021</td> <td>Raw and treated water: E.Coli & Total Coliform (ND<2)</td> <td>ML79/2021 dated 25/2/21</td> </tr> <tr> <td>March 2021</td> <td>Raw and treated water: E.Coli & Total Coliform (ND<2)</td> <td>ML80/79/2021 dated 30/3/21</td> </tr> </tbody> </table> <p>On top of the analysis by internal laboratory, health department officer has also come to take samples as required under Workers Minimum Housing and Amenities Act 1990. The latest sample dated</p>	Month	Analysis Result	Report reference	January 2021	Raw and treated water: E.Coli & Total Coliform (ND<2)	ML195/2021 dated 26/1/21	February 2021	Raw and treated water: E.Coli & Total Coliform (ND<2)	ML79/2021 dated 25/2/21	March 2021	Raw and treated water: E.Coli & Total Coliform (ND<2)	ML80/79/2021 dated 30/3/21	<p>Complied</p>
Month	Analysis Result	Report reference													
January 2021	Raw and treated water: E.Coli & Total Coliform (ND<2)	ML195/2021 dated 26/1/21													
February 2021	Raw and treated water: E.Coli & Total Coliform (ND<2)	ML79/2021 dated 25/2/21													
March 2021	Raw and treated water: E.Coli & Total Coliform (ND<2)	ML80/79/2021 dated 30/3/21													

**RSPO P&C Public Summary Report
Revision 12 (Jun 2021)**

		<p>12/6/2020 was verified. Result was found to be compliance with National Drinking Water Quality Standard.</p> <p>Workers awareness program to save water is in place and carried out mostly during morning briefing. During interview with workers, found that clean water is accessible at all day.</p> <p>The Mill Identification & Management of Waste Water FY 2021:</p> <table border="1"> <thead> <tr> <th data-bbox="1137 580 1173 743"></th> <th data-bbox="1173 580 1335 743">Location</th> <th data-bbox="1335 580 1563 743">Waste water produced</th> <th data-bbox="1563 580 1751 743">Treatment/containment</th> <th data-bbox="1751 580 1939 743">Reuse/ recycle/ disposal method</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 743 1173 1043">1</td> <td data-bbox="1173 743 1335 1043">Processing stations</td> <td data-bbox="1335 743 1563 1043">Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water</td> <td data-bbox="1563 743 1751 1043">Oil recovery/ ETP</td> <td data-bbox="1751 743 1939 1043">Recover into system</td> </tr> <tr> <td data-bbox="1137 1043 1173 1126">2</td> <td data-bbox="1173 1043 1335 1126">Boiler</td> <td data-bbox="1335 1043 1563 1126">Blow down, cleaning water</td> <td data-bbox="1563 1043 1751 1126">Sludge pit, ETP</td> <td data-bbox="1751 1043 1939 1126">Monsoon drain</td> </tr> <tr> <td data-bbox="1137 1126 1173 1209">3</td> <td data-bbox="1173 1126 1335 1209">Process ramp</td> <td data-bbox="1335 1126 1563 1209">Rainfall runoff</td> <td data-bbox="1563 1126 1751 1209">Sedimentation trap</td> <td data-bbox="1751 1126 1939 1209">Monsoon drain</td> </tr> <tr> <td data-bbox="1137 1209 1173 1353">4</td> <td data-bbox="1173 1209 1335 1353">Engine room</td> <td data-bbox="1335 1209 1563 1353">Steam condensate, turbine cooling water</td> <td data-bbox="1563 1209 1751 1353">Monsoon drain, recycled tank</td> <td data-bbox="1751 1209 1939 1353">Monsoon drain</td> </tr> </tbody> </table>		Location	Waste water produced	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	3	Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain	4	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain	
	Location	Waste water produced	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																								
3	Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain																								
4	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain																								

		5	Lab	Cleaning water	Process drain	Monsoon drain																			
		6	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>The Estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014). The buffer zones established are as follows:</p> <table border="1" data-bbox="1189 927 1816 1123"> <thead> <tr> <th>No</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>The signboards were displayed accordingly at the site where applicable. The guideline was issued by the GSQM Unit with latest revision dated on 13/06/2011. However, it was oobserved during site visit at P14C and P09B;</p> <p>The final row of OP was marked/demarcated at buffer/riparian zone area. Evidence of spray was sighted at the said area during visit.</p>					No	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	Non-compliance
No	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																							

**RSPO P&C Public Summary Report
Revision 12 (Jun 2021)**

		The last round of spraying was done on March 2021. Thus, major NC was issued.																																					
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>Based on "<i>Compliance Schedule</i>", license no. 004160 (license period 1/7/20 – 30/06/21). Sighted quarterly report has been submitted to DOE by quarterly basis. Latest submission for to DOE on 14/1/21 for period October to December 2020. Latest monthly analysis from January to March 2021 summarized as per below:</p> <table border="1" data-bbox="1189 651 1883 1066"> <thead> <tr> <th>No</th> <th>Parameter</th> <th>STD</th> <th>18/3/21 Ref: EP175/ 2021</th> <th>8/2/21 Ref: EP123/ 2021</th> <th>15/1/21 Ref: EP63/ 2021</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>5-9</td> <td>8.3</td> <td>7.8</td> <td>8</td> </tr> <tr> <td>2</td> <td>BOD mg/l</td> <td>100</td> <td>10</td> <td>20</td> <td>58</td> </tr> <tr> <td>3</td> <td>A Nitrogen</td> <td>0-150</td> <td><1</td> <td><1</td> <td>88</td> </tr> <tr> <td>4</td> <td>Total N</td> <td>0-200</td> <td>69</td> <td>12</td> <td>116</td> </tr> <tr> <td>5</td> <td>Oil & Grease</td> <td>0-50</td> <td>3</td> <td>2</td> <td>3</td> </tr> </tbody> </table> <p>All parameters tested complied with regulatory standards.</p>	No	Parameter	STD	18/3/21 Ref: EP175/ 2021	8/2/21 Ref: EP123/ 2021	15/1/21 Ref: EP63/ 2021	1	pH	5-9	8.3	7.8	8	2	BOD mg/l	100	10	20	58	3	A Nitrogen	0-150	<1	<1	88	4	Total N	0-200	69	12	116	5	Oil & Grease	0-50	3	2	3	Complied
No	Parameter	STD	18/3/21 Ref: EP175/ 2021	8/2/21 Ref: EP123/ 2021	15/1/21 Ref: EP63/ 2021																																		
1	pH	5-9	8.3	7.8	8																																		
2	BOD mg/l	100	10	20	58																																		
3	A Nitrogen	0-150	<1	<1	88																																		
4	Total N	0-200	69	12	116																																		
5	Oil & Grease	0-50	3	2	3																																		
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill processing water are obtained from the 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 2020/2021 of fresh fruit bunches (FFB) below;</p> <table border="1" data-bbox="1189 1326 1753 1367"> <thead> <tr> <th>No</th> <th>Month</th> <th>2020</th> <th>2021</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	No	Month	2020	2021					Complied																												
No	Month	2020	2021																																				

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<table border="1" data-bbox="1193 363 1753 922"> <tr><td>1</td><td>Jan</td><td>2.09</td><td>1.56</td></tr> <tr><td>2</td><td>Feb</td><td>1.98</td><td>1.65</td></tr> <tr><td>3</td><td>Mac</td><td>2.04</td><td>1.67</td></tr> <tr><td>4</td><td>Apr</td><td>1.72</td><td>-</td></tr> <tr><td>5</td><td>May</td><td>1.87</td><td>-</td></tr> <tr><td>6</td><td>June</td><td>1.83</td><td>-</td></tr> <tr><td>7</td><td>July</td><td>1.91</td><td>-</td></tr> <tr><td>8</td><td>Aug</td><td>1.87</td><td>-</td></tr> <tr><td>9</td><td>Sep</td><td>1.82</td><td>-</td></tr> <tr><td>10</td><td>Oct</td><td>1.99</td><td>-</td></tr> <tr><td>11</td><td>Nov</td><td>2.81</td><td>-</td></tr> <tr><td>12</td><td>Dec</td><td>1.52</td><td>-</td></tr> </table> <p data-bbox="1137 965 1933 1125">A slightly higher water usage noted against ratio of 1.40, 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</p>	1	Jan	2.09	1.56	2	Feb	1.98	1.65	3	Mac	2.04	1.67	4	Apr	1.72	-	5	May	1.87	-	6	June	1.83	-	7	July	1.91	-	8	Aug	1.87	-	9	Sep	1.82	-	10	Oct	1.99	-	11	Nov	2.81	-	12	Dec	1.52	-	
1	Jan	2.09	1.56																																																
2	Feb	1.98	1.65																																																
3	Mac	2.04	1.67																																																
4	Apr	1.72	-																																																
5	May	1.87	-																																																
6	June	1.83	-																																																
7	July	1.91	-																																																
8	Aug	1.87	-																																																
9	Sep	1.82	-																																																
10	Oct	1.99	-																																																
11	Nov	2.81	-																																																
12	Dec	1.52	-																																																
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																																																			
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and documented under diesel/fossil fuel management plan FY2021.</p>	Complied																																																

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		1	Backhoe/ tractor	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	Electrical supply	To reduce reliance on gen-sets for power supply	Utilization of TNB sources							
<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>SOU 10 Mill and 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. c) SOU 10 has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. <p>Summary of emission per product summarized as per below:</p> <table border="1"> <thead> <tr> <th>Emissions per Product</th> <th>tCO2e/tProduct</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>1.35</td> </tr> <tr> <td>PK</td> <td>1.35</td> </tr> </tbody> </table>				Emissions per Product	tCO2e/tProduct	CPO	1.35	PK	1.35	Complied
Emissions per Product	tCO2e/tProduct											
CPO	1.35											
PK	1.35											

7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>There is no new development area in this certification unit. Other source of emission for assisting operation is reported using the RSPO PalmGHG.</p>	Complied
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. SOU10 has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. (SM/5.2/EAI) and (SM/5.2/EIE) which covers estates and mill activities / operation. Based on document review for (EIA and EIE) and site observation, it was noted that;</p> <p>i) Operation of steam boiler (EIA/2012/008-01) - Legal reference for air contaminant (particulate/soot/smoke) was not identified. Evaluation of EIA under (EIE/2011/208-2) reported as not significant.</p> <p>ii) EFB dumping activity was not risk assessed and documented under EIA. Evaluation of EIA available and reported in EIE/2012/0031-021. Weightage was reported not significant for normal, abnormal and emergency situation with no legal reference to the said activity. Emergency situation under fire, over dumping (abnormal) with leachate generation was not identified.</p> <p>iii) Desludging activity and tertiary treatment plant EIA/EIE was not made available.</p> <p>Thus, A major NC was issued.</p>	Non-compliance
<p>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</p>			

7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>There was no land preparation of existence or new planting in SOU 210 and Estate by burning ever since SDB practiced zero burning as per the policy in:</p> <p>a) EQMS-SOP-SectionB2 - Under felling/clearing & land preparation</p> <p>b) Carbon Policy</p> <p>SDP 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 the OP cultivation.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -</p>	<p>Fire prevention and control measures has been established based on SDP Zero Burning Policy and Fire Prevention and Control Measures by GSQM. The established measures includes zero burning replanting technique, water management and peat area (if applicable), fire prevention and control, fire suppression and daily hot spots monitoring. Hot spot alert monitoring dashboard can be found via this link; http://www.simedarbyplantation.com/sustainability/hotspot-dashboard/.The above measures are developed based on risk area @ peat soil area. Latest hotspot detected was on 6th April 2020 at Angsana Estate (other SDPB group estate – Indonesia).</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -</p>	<p>Based on the last stakeholder meeting minute dated 6/7/20, fire prevention and control measures presented to the stakeholders. Adjacent stakeholders (FELDA Sg Koyan, Kg Bertang, Ladang Tanah Makmur Berhad (TMB) and Kg Lubuk Kulit) were invited but none of them attended the meeting. Further verified with the estate assistant, no further engagement process being done for the adjacent stakeholders. Thus, a minor NC was raised.</p>	Non-compliance

Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.																	
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>No new development within SOU10 Bukit Puteri certification unit. The development was done back in 1983 by the previous company which now under Sime Darby Plantation Berhad subsidiary.</p>	Complied														
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>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>High Conservation Value (HCV) re-assessment was carried out for Pahang Zone which cover for 3 SOUs namely SOU10 Bukit Puteri, SOU11 Kerdu and SOU12 Jabor. Report version II dated March 2016. Summary of HCV area within SOU10 area as per the following:</p> <table border="1" data-bbox="1137 879 1930 1278"> <thead> <tr> <th>Estate</th> <th>Area identified</th> <th>Ha</th> <th>HCV category</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Bukit Puteri Estate</td> <td>River reserve (Sg Telong)</td> <td>17.77</td> <td rowspan="4">HCV 4 - promote conservation and prevent erosion - provide basic service (water resource) for the critical situations.</td> </tr> <tr> <td>Water Catchment</td> <td>2.81</td> </tr> <tr> <td>Pond</td> <td>0.78</td> </tr> <tr> <td>Total</td> <td>21.36</td> </tr> </tbody> </table>	Estate	Area identified	Ha	HCV category	Bukit Puteri Estate	River reserve (Sg Telong)	17.77	HCV 4 - promote conservation and prevent erosion - provide basic service (water resource) for the critical situations.	Water Catchment	2.81	Pond	0.78	Total	21.36	Complied
Estate	Area identified	Ha	HCV category														
Bukit Puteri Estate	River reserve (Sg Telong)	17.77	HCV 4 - promote conservation and prevent erosion - provide basic service (water resource) for the critical situations.														
	Water Catchment	2.81															
	Pond	0.78															
	Total	21.36															
7.12.3	<p><i>Indicator is not applicable in Malaysia context</i></p>	<p>Not applicable.</p>	Complied														

7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -</p>	No new planting after 15 November 2018 within Bukit Puteri POM certification unit.	Complied
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -</p>	No local communities have been identified in HCV areas, HCS forest after 15 November 2018 within Bukit Puteri POM certification unit.	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -</p>	A programme to regularly educate the workforce about the status of RTE species is in place. Evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities were maintained and implemented. Signage was utilised as part of creating awareness among employees on the restriction of poaching/capturing/harming/collecting/killing the RTE species. For Bukit Puteri Estate, APs are the trained personnel for animal sighting concurrently during daily patrolling. Training programme also was given to workers as to remind them that disciplinary measures will be 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. Summary of training carried out as per below:	OFI

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		Group of participants	Training	Date of training	
		Auxiliary police	Refresher training on HCV and boundary area	28/1/21	
		Estate workers (sprayer)	Refresher training on HCV and boundary area	29/1/21	
		<p>OFI - A programme to regularly educate the workforce about the status of RTE species to be put in place. Information related to RTE and disciplinary measures 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 to be included in the programme for improvement.</p>			
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>No new planting after 15 November 2018 within Bukit Puteri POM certification unit. Thus, this indicator is not available. For existing HCV area, on-going monitoring was done on monthly basis. HCV management plan documented under Biodiversity Management Plan for FY 2021.</p> <p>Animal sighting, encroachment/illegal activities and erosion being monitored and recorded using "<i>Buku Rondaan Sempadan</i>" and under Biodiversity Management Programme. Based on last 3 months record, encroachment/illegal activities and erosion recorded. There were evidences of animal sightings recorded in the patrolling book however no RTE species sighted based on the record. Interview with the group of workers and APs have confirmed the understanding and awareness on RTE species.</p> <p>Visual observation on site; i) Evidence of spraying at buffer zone demarcated area near Sg</p>			<p>Non-compliance</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>Telang (field P14C and P09B). ii) Construction of earth drain to mitigate flooding/stagnant water near buffer zone area. Results of monitoring i.e pictorial (riverbanks), water analysis and patrolling records were not been considered in the review and establishment of the management plan. Thus, a minor NC was issued.</p>	
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -</p>	<p>No land clearing since without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Bukit Puteri POM certification unit. Thus, this indicator is not available.</p>	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020** for **Bukit Puteri POM** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2020** for **Bukit Puteri POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.35
PK	1.35

Extraction	%
OER	20.57
KER	4.28

Production	t/yr
FFB Process	77,421.09
CPO Produced	15,922.33
PK Produced	3,315.69

Land Use	Ha
OP Planted Area	9,592.92
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	9,592.92

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	37,393.53	0.70	1,374.45	0.81	0	0	38,767.98	1.51
CO ₂ Emission from fertilizer	3,059.73	0.06	111.81	0.07	0	0	3,171.54	0.13
NO ₂ Emission	1,456.06	0.03	52.67	0.03	0	0	1,508.73	0.03
Fuel Consumption	292.42	0.01	11.99	0.01	0	0	304.41	0.02
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-35,444.09	-0.66	-1,208.17	-0.71	0	0	-36,652.26	-1.37
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	6,757.66	0.13	342.75	0.20	0	0	10,455.16	0.33

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	15175.84	0.02
Fuel Consumption	35.57	0
Grid Electricity Utilization	328.68	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	15540.09	0.02

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

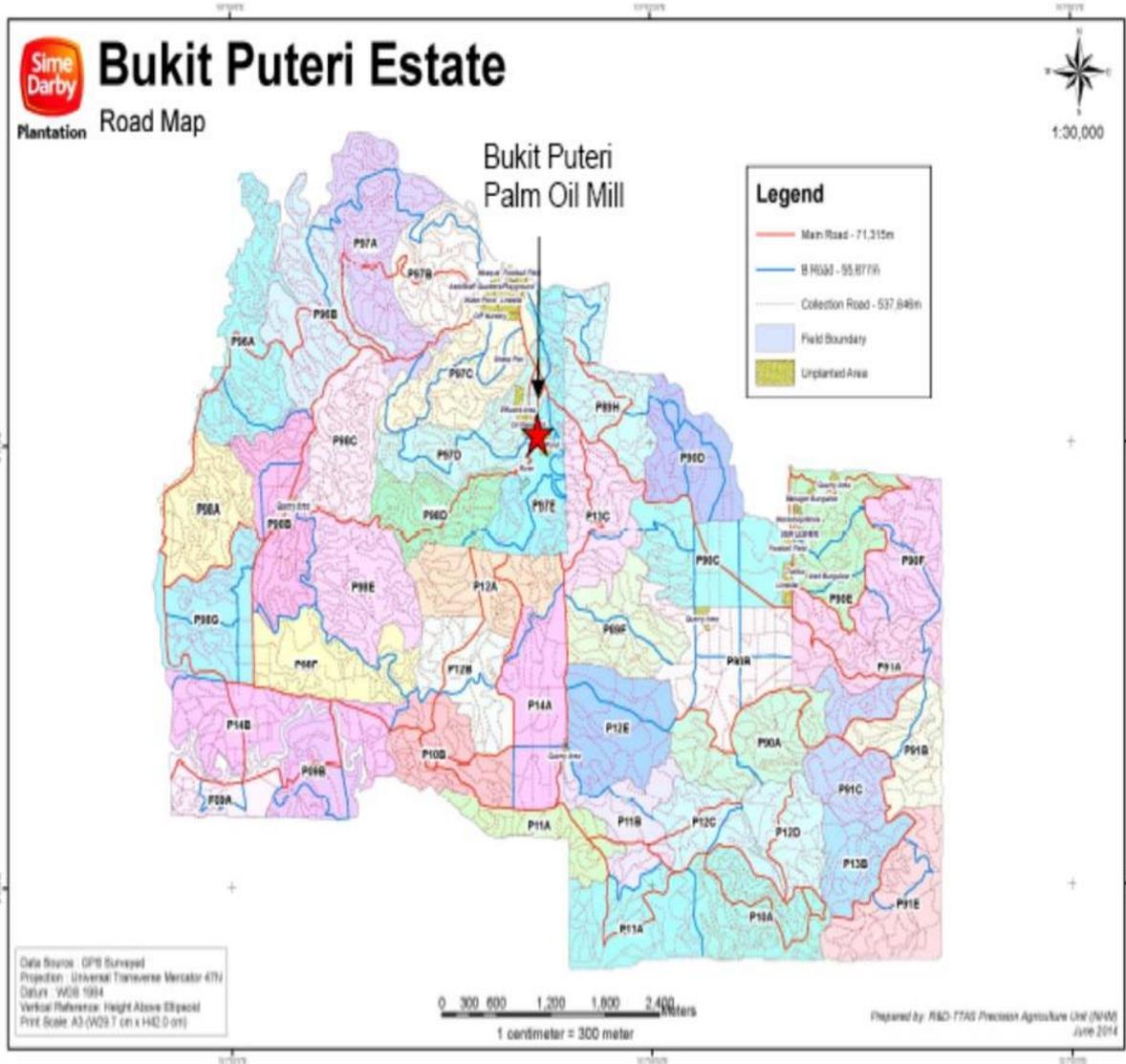
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



Appendix F: 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
ISS	Independent Smallholder Standard
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
RSQM	Regional Sustainable Quality Manager
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure