

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

<p>Client Company Name / Parent Company: Sime Darby Plantation Berhad</p>
<p>Client Company / Parent Company Address: Level 3A, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7, Ara Damansara, Selangor, Malaysia</p>
<p>Certification Unit: Strategic Operating Unit (SOU 1) – Sungai Dingin Palm Oil Mill</p> <p>Location of Certification Unit: Jalan Mahang-Kelang Lama 09700, Karangan, Kedah, Malaysia</p>
<p>Date of Final Report: 20/09/2022</p>

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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, 47301 Ara Damansara, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 1) – Sungai Dingin Palm Oil Mill		
Location / Address	Jalan Mahang-Kelang Lama, 09700 Karangan, Kedah, Malaysia		
Website	www.simedarbyplantation.com		
Management Representative	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM)	E-mail	shylaja.vasudevan@simedarbyplantation.com
Telephone	603-78484379 (Head Office)	Facsimile	603-78484356 (Head Office)

2. Certification Information			
Certificate Number	RSPO 550179	Certificate Start Date	12/08/2020
Date of First Certification	12/08/2010	Certificate Expiry Date	11/08/2025
Scope of Certification	Production of Palm Oil & Palm Kernel		
Visit Objectives	<ul style="list-style-type: none"> Determination of the conformity of the client's management system, or parts of it, with audit criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_2) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	80 mt/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 705584	MSPO 2530-4:2013 (MSPO Part 4: General Principles For Palm Oil Mill)	BSI Services Malaysia Sdn Bhd	14/02/2023
MSPO 705628	MSPO 2530-3:2013 (MSPO Part 3: General Principles For Oil Palm Plantations And Organized Smallholders)		14/02/2023
MSPO 717859	MSPO Supply Chain Certification Standard: 2018		20/10/2024

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

5. Description of Supply Base					
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
Sungai Dingin Estate	2,928.17	3.56	1,312.30	4,244.03	69.00
Padang Buluh Estate	3,447.00	14.34	547.13	4,008.47	85.99
Bukit Selarong Estate	3,552.61	34.24	222.29	3,809.14	93.27
Anak Kulim Estate	207.51	1.72	1,313.26	1,522.49	13.63
Bukit Hijau Estate	1,442.10	5.33	1,277.57	2,725.00	52.92
Jentayu Estate	1,156.39	0.71	986.84	2,143.94	53.94
Somme Estate	808.39	-	133.17	941.56	85.86
Total	13,542.17	59.90	5,792.56	19,394.63	69.82

Notes:
 Jentayu Estate: Total planted & Total Area reduced 34.65Ha based on survey conducted by GPS Team on June 2021.
 Bukit Selarong Estate: Total planted & Total Area reduced 87.03Ha due land acquisition by Kulim High Tech Park (KHTP) on March 2022
 Anak Kulim Estate: Total Planted reduced 181.68Ha & increase 181.68Ha at Infrastructure and other due land leasing to Paulownia.

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Sungai Dingin Estate	672.71	116.20	2,139.26	-	2,255.46	672.71
Padang Buluh Estate	245	1,069.00	2,133.00	-	3,202.00	245.00
Bukit Selarong Estate	684.75	863.45	1,994.41	10.00	2,867.86	684.75
Anak Kulim Estate	-	-	207.51	-	207.51	-
Bukit Hijau Estate	400.66	-	1,041.44	-	1,041.44	400.66
Jentayu Estate	278.12	-	878.27	-	878.27	278.12
Somme Estate	222.76	184.38	401.25	-	585.63	222.76
Total (ha)	2,504.00	2,233.03	8,795.14	10.00	11,038.17	2,504.00

Note: Only Mature area is considered as production area

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7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2021-Jul 2022)	Actual (Apr 2021-Mar 2022)		Forecast (Aug 2022-Jul 2023)
		Previous license period (Apr 2021-Jul 2021)	Current license period (Aug 2021-Mar 2022)	
Sungai Dingin Estate	43,939.71	18,519.73	23,843.39	33,832.00
Padang Buluh Estate	83,025.00	22,763.85	32,674.52	58,900.00
Bukit Selarong Estate	57,976.18	19,579.79	26,707.78	54,237.43
Anak Kulim Estate	3,022.36	1,104.82	1,764.59	3,132.00
Bukit Hijau Estate	18,933.57	6,557.15	8,304.47	12,511.15
Jentayu Estate	18,415.00	5,965.15	8,944.94	14,356.00
Somme Estate	12,991.44	5,092.52	7,095.50	11,900.00
Total	238,303.26	188,918.20		188,868.58
Note:				

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2021-Jul 2022)	Actual (Apr 2021-Mar 2022)		Forecast (Aug 2022-Jul 2023)
		Previous license period (Apr 2021-Jul 2021)	Current license period (Aug 2021-Mar 2022)	
Tali Ayer Estate		-	108.78	
Holyrood Estate		-	99.02	
Genting Bukit Sembilan		1,150.17	832.44	
Total		2,190.41		
Note:				

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2021-Jul 2022)	Actual (Apr 2021-Mar 2022)		Forecast (Aug 2022-Jul 2023)
		Previous license period (Apr 2021-Jul 2021)	Current license period (Aug 2021-Mar 2022)	
CK Teik		12,120.90	28,018.55	
KPSM Selama		152.93	114.75	
Tang Tatt		12,207.53	20,310.16	
GSR Kriss		-	19.54	
Alma		-	920.82	
Total		73,865.17		

Note:

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	Apr-21	23,285.33	4,422.80	27,708.13
2	May-21	21,147.58	5,392.94	26,540.52
3	Jun-21	18,755.12	6,504.84	25,259.96
4	Jul-21	17,210.60	8,160.78	25,371.38
5	Aug-21	16,423.96	7,540.18	23,964.14
6	Sep-21	15,007.73	6,484.81	21,492.54
7	Oct-21	16,172.44	7,322.16	23,494.60
8	Nov-21	13,049.65	6,934.27	19,983.92
9	Dec-21	11,748.41	6,183.70	17,932.11
10	Jan-22	11,469.14	5,438.54	16,907.68
11	Feb-22	12,537.03	4,313.73	16,850.76
12	Mar-22	14,301.62	5,166.41	19,468.03
	TOTAL	191,108.60	73,865.17	264,973.77

Note:

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10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Aug 2021-Jul 2022)	Actual (Apr 2021-Mar 2022)		Forecast (Aug 2022-Jul 2023)
	Previous license period (Apr 2021-Jul 2021)	Current license period (Aug 2021-Mar 2022)	
FFB	FFB		FFB
238,303.26 mt	80,733.18 mt	110,375.42 mt	188,868.58 mt
	191,108.60 mt		
CPO (OER: 21.65%)	CPO (OER: 20.50%)		CPO (OER: 21.05%)
51,592.66 mt	16,793.57 mt	22,388.48 mt	39,756.84 mt
	39,182.05 mt		
PK (KER: 5.66%)	PK (KER: 5.40%)		PK (KER: 5.64%)
13,487.96 mt	4,570.86 mt	5,757.06 mt	10,652.19 mt
	10,327.92 mt		
Note:			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Apr-21	4,717.61	1,432.05
2	May-21	4,371.20	1,254.05
3	Jun-21	4,049.23	984.64
4	Jul-21	3,655.53	900.11
5	Aug-21	3,365.27	946.02
6	Sep-21	3,190.64	810.42
7	Oct-21	3,341.23	802.15
8	Nov-21	2,688.23	636.82
9	Dec-21	2,383.75	610.92
10	Jan-22	2,301.86	611.31
11	Feb-22	2,344.42	624.34
12	Mar-22	2,773.07	715.08
	TOTAL	39,182.05	10,327.92
Note:			

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11. Summary of Actual Volume sold					
Current License period (Aug 2021 – Mar 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	293.49	-	-	22,094.99	22,388.48
PK (MT)	1,275.13	-	-	4,481.93	5,757.06
Credits	-	-	-	-	-
Previous License period (Apr 2021 – Jul 2021)					
CPO (MT)	3,331.32	-	-	13,462.25	16,793.57
PK (MT)		-	-	4,570.86	4,570.86
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	Non-disclosure 1	-	1,130.06	-
2	Non-disclosure 2	-	2,494.75	-
3	Non-disclosure 3	-	-	1,275.13
TOTAL			3,624.81	1,275.13

Note:

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified 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	Non-disclosure 4	35,557.24	-
2	Non-disclosure 5	-	496.83
3	Non-disclosure 6	-	402.86

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4	Non-disclosure 7	-	3,509.11
5	Non-disclosure 8	-	4,643.99
TOTAL		35,557.24	9,052.79
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
	Nil		
TOTAL			
Note:			

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Not Applicable)			Actual (Not Applicable)			Forecast (Not Applicable)		
	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									
CSPK									

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit – N/A						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
TOTAL						
Note: Not Applicable						

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13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (Not Applicable)							
Credits							
Physical							
Previous License period (Not Applicable)							
Credits							
Physical							

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit – N/A							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
TOTAL							
Note: Not Applicable							

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,

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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 **23-26/05/2022**. The audit programme is included as Section 2.3.

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

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Malaysia National Interpretation 2019 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 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.

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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)
Sungai Dingin POM	✓	✓	✓	✓	✓
Sungai Dingin Estate		✓		✓	✓
Padang Buluh Estate	✓			✓	
Bukit Selarong Estate		✓			✓
Anak Kulim Estate		✓		✓	
Bukit Hijau Estate	✓		✓		
Jentayu Estate			✓		✓
Somme Estate	✓		✓		

Tentative Date of Next Visit: May 22, 2023 - May 25, 2023

Total Number of Mandays: 12

2.2 BSI Assessment Team

Name	Role	Competency
Valence Shem (VSH)	Team Leader	<p>Education: BTech (Hons) Bachelor Degree in Industrial Technology, University of Science Malaysia</p> <p>Work Experience:</p> <ol style="list-style-type: none"> 1) 9 years working experience in oil palm plantation industry 2) Management system auditing since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS, MSPO and SMETA <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 14001 Lead Auditor Course 2) ISO 9001 Lead Auditor Course 3) Endorsed RSPO P&C Lead Auditor Course 4) Endorsed RSPO SCCS Lead Assessor Course 5) MSPO Awareness Training 6) ISO 45000 Lead Auditor Course 7) SMETA Auditor training 8) HCV-HCS training 9) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course <p>Aspect covered in this audit: Legal requirements, natural and HCV conservation, water & wastes management, environmental aspects, occupational health and safety, GAP, mill best practices, training, economic management plan, and supply chain.</p> <p>Language proficiency: English and Bahasa Malaysia</p>
Hafriazhar Mohd Mokhtar (HMM)	Team Member	<p>Education: Bachelor Degree in Chemical Engineering, University of Technology Malaysia</p> <p>Work Experience:</p> <ol style="list-style-type: none"> 1) More than 5 years of direct work experience in the upstream processes of palm oil within the plantation industry 2) Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days as auditor for multiple disciplines covering Malaysia, Indonesia and Thailand <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 14001 Lead Auditor Course 2) ISO 9001 Lead Auditor Course

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		<p>3) Endorsed RSPO P&C Lead Auditor Course 4) Endorsed RSPO SCCS Lead Assessor Course 5) MSPO Awareness Training 6) ISO 45000 Lead Auditor Course 7) SMETA Auditor training 8) HCV-HCS training 9) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course</p> <p>Aspect covered in this audit: Legal requirements, policies and commitment, social aspects, contract agreement, human rights, land use rights, workers' welfare, and supply chain.</p> <p>Language proficiency: English and Bahasa Malaysia</p>
<p>Amir bin Bahari (ABB)</p>	<p>Team Member</p>	<p>Education: B.Sc. (Hons) Chemistry USM and Diploma in Palm Oil Milling Tech/Management MPOB 1996</p> <p>Work Experience: 30 years working experience in plantation industry among others managing rubber factories, palm oil mills and estates.</p> <p>Training attended:</p> <p>1) ISO 9001 Lead Auditor Course 2) ISO 14001 Lead Auditor Course 3) OHSAS 18001 Lead Auditor Course 4) Endorsed RSPO P&C Lead Auditor Course 5) MSPO Awareness Training 6) HCV-HCS training 7) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course</p> <p>Aspect covered in this audit: Legal requirements, natural and HCV conservation, water & wastes management, environmental aspects, GAP, mill best practices, training, and economic management plan.</p> <p>Language proficiency: English and Bahasa Malaysia</p>

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Accompanying Persons:

Name	Role
Nil	

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1.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment.

Date	Time	Subjects	VSH	HMM	ABB
Monday 23/05/2022	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) 	✓	✓	✓
	0900-1300	<u>Somme Estate</u> 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, Scheduled waste management, worker housing, clinic, Landfill, etc. and Document review P1 – P7	✓	✓	✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-
	1300-1400	Lunch break	✓	✓	✓
	1400-1630	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	✓	✓	✓
Tuesday 24/05/2022	0900-1300	<u>Jentayu Estate</u> 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, Scheduled waste management, worker housing, clinic, Landfill, etc. and Document review P1 – P7	✓	✓	✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-
	1300-1400	Lunch break	✓	✓	✓
	1400-1630	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	✓	✓	✓

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Wednesday 25/05/2022	0900-1300	<u>Sungai Dingin POM</u> Site visit: 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.	✓	✓	✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-
	1300-1400	Lunch break			
	1400-1630	Document Review P1 – P7: SOPs, Supply chain, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓	✓
	1630-1600	Interim closing briefing	✓	✓	✓
Thursday 26/05/2022	0900-1300	<u>Bukit Hijau Estate</u> 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, Scheduled waste management, worker housing, clinic, Landfill, etc. and Document review P1 – P7	✓	✓	✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-
	1300-1400	Lunch break			
	1400-1530	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.).	✓	✓	✓
	1530-1600	Interim closing briefing	✓	✓	✓
	1600-1630	Audit team discussion & preparation for closing meeting	✓	✓	✓
	1630-1700	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?	Yes. SDP TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table. As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	Yes. All estates and mill has been certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 1st Oct 2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera was sold and currently SDP have no control in the management.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (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 2021.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Although there are deviation has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.	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?	Yes. Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties was sold and currently Sime Darby	Complied

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	<p>Plantation Berhad have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019. Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad 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 01/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: www.rspo.org/certification/public-announcement</p> <p>For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/</p> <p>ACOP 2020 has been cross-referenced as below: www.rspo.org/members/29</p>	
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>Although there lapses has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as these 2 assets were disposed.</p>	<p>Complied</p>
<p>Un-Certified Units or Holdings</p>		
<p>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.</p>	<p>Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification 1. NBPOL (Poliamba Limited) 23/05/2020 – no</p>	<p>Complied</p>

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	<p>comments</p> <p>https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyplantation-berhad-nbpol-poliamba-limited</p> <p>2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments</p> <p>https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-a-subsi-dary-of-sime-darby-plantationbhd-guadalcanal-plain-palm-oil-ltd</p> <p>3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments</p> <p>https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-ramuagri-industries-ltd</p> <p>4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments</p> <p>https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-ramu-agri-industries-limited</p> <p>5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments</p> <p>https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-higaturu-oil-palms</p> <p>6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO Website</p> <p>https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamawan-png</p> <p>7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO Website</p> <p>https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamendauen-png</p> <p>8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website</p> <p>https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-roka-mini-estate</p> <p>9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website</p> <p>https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-j-estate</p> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website</p>	
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	<p>https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-limited-higaturu-oil-palm</p> <p>11. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website</p> <p>https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc-new-planting-assessment</p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website</p> <p>https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment1</p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website</p> <p>https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment</p> <p>Management units for 11 – 13 above were disposed.</p>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as both sites was disposed.</p> <p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancy between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of 14/07/2021, 10 LUCAs were approved with 0 conservation liability and remaining 9 are still pending from RSPO.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>Sime Darby Plantation maintain corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.</p>	<p>Complied</p>
<p>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,</p>	<p>Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue</p>	<p>Complied</p>

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a positive assurance statement shall be available and justified.	are mainly awaiting for Land Titles. The last audit was conducted between July 2020 – August 2020. 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?	Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company	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.	There is no scheme smallholders and/ or outgrowers include in the scope of certification.	Complied

Approved Time Bound Plan

SDP - RSPO Certification for Time Bound Plan - Malaysia Operations

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
1	Sungai Dingin	Sungai Dingin Oil Mill	-	Karangan, Kedah	Certified	12/08/2011	-
		Anak Kulim Estate					
		Sungai Dingin Estate					
		Somme Estate					
		Bukit Selarong Estate					
		Padang Buluh Estate					
		Bukit Hijau Estate					
		Jentayu Estate					
2	Chersonese	Chersonese Oil Mill	-	Kuala Kurau, Perak	Certified	05/10/2011	-
		Chersonese Estate					
		Kalumpong Estate					
		Tali Ayer Estate					
		Holyrood Estate					
3	Elphil	Elphil Oil Mill	-	Sungai Siput, Perak	Certified	16/08/2011	-
		Kamuning Estate					
		Elphil Estate					
		Kinta Kellas Estate					
4	Flemington	Flemington Oil Mill	-	Teluk Intan, Perak	Certified	05/10/2011	-
		Flemington Estate					
		Bagan Datoh Estate					

		Sabak Bernam Estate					
		Sg. Samak Estate					
5	Seri Intan/Selaba	Seri Intan Oil Mill	-	Teluk Intan, Perak	Certified	03/03/2011	-
		Selaba Oil Mill					
		Seri Intan (+ Selaba) Estate					
		Sabrang Estate					
		Sogomana Estate					
		Sg. Wangi Estate					
		Bikam Estate					
		Cluny (+ Bedford) Estate					
6	Tennamaram	Tennamaram Estate					
		Sungai Buluh Estate					
		Bukit Talang Estate					
				Bukit Kerayong Oil Mill	-	Kapar Selangor	Certified
7	Bukit Kerayong	Bukit Kerayong Estate					
		Bukit Cheraka Estate					
		Elmina Estate					
				East Oil Mill	-	Carey Island, Selangor	Certified
8	East	East Estate					
		Sepang Estate					
		Dusun Durian Estate					
				West Oil Mill	-	Carey Island, Selangor	Certified
9	West	West Estate					

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10	Bukit Puteri	Bukit Puteri Oil Mill	-	Raub, Pahang	Certified	07/07/2011	-
		Bukit Puteri Estate					
11	Kerdau	Kerdau Oil Mill	-	Temerloh, Pahang	Certified	07/07/2011	Jentar Estate has merged with Kerdau Estate and reported to the CB in March/April 2021.
		Kerdau Estate					
		Jentar Estate					
		Mentakab Estate					
		Chenor Estate					
		Sg Mai Estate					
12	Jabor	Jabor Oil Mill	-	Kuantan, Pahang	Certified	07/07/2011	-
		Jabor Estate					
13	Labu	Labu Oil Mill	-	Nilai, Negeri Sembilan	Certified	30/12/2011	New Labu Estate has become a division of Labu Estate.
		Labu Estate					
14	Tanah Merah	Tanah Merah Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	19/05/2010	-
		Tanah Merah Estate					
		Bukit Pelandok Estate					
15	Sua Betong	Sua Betong Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	18/02/2014	Siliao Estate has now been merged into Salak Estate and Bradwall Estate.
		Sua Betong Estate					
		Sengkang Estate					
		Bradwall Estate					
		PD Lukut Estate					
		Tampin Linggi Estate					
		Sg. Bahru Estate					
		Salak Estate					
16	Kok Foh	Kok Foh Oil Mill	-		Certified	07/07/2011	

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		Muar River Estate		Bahau, Negeri Sembilan			Sg. Gemas Estate has now been merged into Sg. Senarut Estate.
		Sg. Senarut Estate					
		Sg. Gemas Estate					
		Kok Foh Estate					
		Bukit Pilah Estate					
		St. Helier Estate					
		Sungai Sabaling Estate					
		Pertang Estate					
17	Kempas	Kempas Oil Mill	-	Jasin, Melaka	Certified	19/05/2010	Serkam Estate, previously from SOU18 (Diamond Jubilee) is now part of SOU 17 (Kempas)
		Kempas Estate					
		Tangkah Estate					
		Kemuning Estate					
18	Diamond Jubilee	Diamond Jubilee Palm Oil Mill	-	Jasin, Melaka	Certified	05/10/2011	Serkam Estate, previously from SOU18 (Diamond Jubilee) is now part of SOU 17 (Kempas) Welch Estate, previously from SOU 19 (Pagoh) is now part of SOU 18 (Diamond Jubilee)
		Serkam Estate					
		Diamond Jubilee Estate					
		Bukit Asahan Estate					
19	Pagoh	Pagoh Oil Mill	-	Muar, Johor	Certified	28/1/2014	-
		Pagoh Estate					
		Welch Estate					
		Lanadron Estate					
		Pengkalan Bukit Estate					
20	Chaah	Chaah Oil Mill	-	Chaah, Johor	Certified	18/11/2010	-
		Chaah Estate					
		Sg. Simpang Kiri Estate					

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		North Labis Estate					
21	Gunung Mas	Gunung Mas Oil Mill	-	Kluang, Johor	Certified	19/05/2010	* SDP acquired Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bkt Paloh Estate of SOU 21 Gunung Mas, Lian Seng has been incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018.
		Gunung Mas Estate					
		Kempas Klebang Estate					
		Bukit Paloh Estate					
		Yong Peng Estate					
22	Bukut Benut	Bukit Benut Oil Mill	-	Kluang, Johor	Certified	05/11/2011	* SDP acquired Talisman Estate in Johor in April 2017. Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut and has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2018.
		Bukit Benut Estate					
		Lambak Elaeis Estate					
		CEP Nyior Estate					
23	Ulu Remis	Ulu Remis Oil Mill	-	Layang-Layang, Johor	Certified	11/04/2011	-
		Ulu Remis Estate					
		Cenas Estate					
		Bukit Badak Estate					
		Tun Dr. Ismail Estate					
		Pekan Estate					
		Sembrong Estate					
24	Hadapan	Hadapan Oil Mill	-	Layang-Layang, Johor	Certified	29/3/2011	-
		Sri Pulai Estate					
		Kulai Estate					
		Layang Estate					
		CEP Renggam Estate					
26	Sandakan Bay	Sandakan Bay	-	Sandakan, Sabah	Certified	01/10/2008	-
		Tun Tan Siew Sin					

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		Tunku Estate					
		Tigowis Estate					
		Sentosa Estate					
		Segaliud Estate					
27	Melalap	Melalap Oil Mill	-	Tenom, Sabah	Certified	21/1/2011	-
		Melalap Estate					
		Sapong Estate					
28	Binuang	Binuang Oil Mill	-	Kunak, Sabah	Certified	16/1/2009	-
		Binuang Estate					
		Sungang Estate					
		Tingkayu Estate					
		Jeleta Bumi Estate					
29	Giram	Giram Oil Mill	-	Kunak, Sabah	Certified	16/1/2009	-
		Giram Estate					
		Mostyn Estate					
30	Merotai	Merotai Oil Mill	-	Tawau, Sabah	Certified	16/1/2009	-
		Merotai Estate					
		Imam Estate					
		Tiger Estate					
		Table Estate					
31	Layang	Layang Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Layang Estate					
		Rasan Estate					
		Belian Estate					

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		Kelida Estate					
		Lavang (Special) Estate					
		Pekaka Estate					
		Ruai Estate					
		Dulang Estate					
		Charquest Estate					
		Paroh Estate					
32	Rajawali	Rajawali Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Rajawali Estate					
		Samudera Estate					
		Semarak Estate					
		Bayu Estate					
33	Derawan	Derawan Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Derawan Estate					
		Sahua Estate					
		Takau Estate					
		Damai Estate					
34	Pekaka	Pekaka Mill	-	Bintulu, Sarawak	Withdrawn	NA	Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang.
35	Bintang	Bintang Oil Mill	-	Johor	NA	NA	* SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on

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							hold. As at 1st Oct 2018, the mill has completed the selling off transaction.
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SDP - RSPO Certification for Time Bound Plan - Indonesia Operations

No	Management Unit	Mill and Supply Base	Time Bound Plan	Latest Internal / External	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name			Audit Date				
1	PT Lahan Tani Sakti	Alur Dumai Mill	-	-	Rokan Hilir District – Riau	Certified	16/01/2012	-
		Alur Dumai Estate						
2	PT Sajang Heulang	Mustika Mill	-	-	Tanah Bumbu District – South Kalimantan	Certified	03/07/2013	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Mustika Estate						
		KKPA-2 PT.SHE Estate						
		KKPA-3 PT.SHE Estate						
		KKPA-5 PT.SHE Estate						
Pantai Bonati Estate	06/07/2011							
3	PT Ladangrumpun Suburabadi	Angsana Mill	-	-	Tanah Bumbu District – South Kalimantan	Certified	06/07/2021	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Angsana Estate						
		Pantai Bonati Estate						
		Gunung Sari Estate						
		KKPA-1 PT.SHE Estate						
		KKPA-4 PT.SHE Estate						
Subur Abadi Plasma 1 Estate	TBC	TBC	TBC	TBC				

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4	PT Langgeng Muaramakmur	Bebunga Mill	-	-	Kotabaru District – South Kalimantan	Certified	16/03/2012	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Bebunga Estate						
		Sungai Cengal Estate						
		Bakau Estate						
		KKPA LMR	TBC	TBC		TBC	TBC	
5	PT Kridatama Lancar	Sukamandang Mill	-	-	Seruyan and East–Kotawaringin District Central Kalimantan	Certified	05/07/2011	-
		Sukamandang Estate						
		Sapiri Estate						
		Barasdanum Estate						
		Kuala Kuayan Estate						
6	PT Bahari Gembira Ria	Ladang Panjang Mill	-		Muaro Jambi District - Jambi	Certified	09/07/2012	Only Division 3 is certified (1,202 Ha). Total Areas of Division 1 and 2 (1,796.19 ha) HGU still in process KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Ladang Panjang Estate						
		Plasma BGR Estate	TBC	TBC		TBC	TBC	
7	PT Tunggal Mitra Plantations	Manggala Mill	-	-	Rokan Hilir District – Riau	Certified	25/11/2010	-
		Manggala 1 Estate						
		Manggala 2 Estate						
		Manggala 3 Estate						
8	PT Paripurna Swakarsa	Pondok Labu Mill	-	-	Kotabaru District – South Kalimantan	Certified	16/03/2012	-
		Pondok Labu Estate	-	-				
		Binturung Estate						
		Rampa Estate						
		Sesulung Estate						

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9	PT Bersama Sejahtera Sakti	Gunung Aru Mill	-		Kotabaru District – South Kalimantan	Certified	05/07/2011	-
		Gunung Aru Estate						
		Gunung Kemas Estate						
		Laut Timur Estate						
		Pantai Timur Estate						
KKPA MBP	TBC	TBC	TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.			
10	PT Guthrie Pecconina	Rantau Panjang Mill	-	-	Musu Banyuasin District – South Sumatera	Certified	16/03/2012	Remarks: Land legalisation process for 4152.70 ha is still in process.
		Rantau Panjang Estate						
		Bumi Ayu Estate						
		Karang Ringin Estate						
		Napal Estate						
		Mangun Jaya Estate						
		Sungai Jernih Estate and GPI KKPA Estate	2023	-				
11	PT Laguna Mandiri	Rantau Mill	-	-	Kotabaru District – South Kalimantan	Certified	30/12/2011	-
		Rantau Estate						
		Matalok Estate						
		Betung Mill						
		Betung Estate						
				01/04/2014				

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		Sekayu Estate						
12	PT Indotruba Tengah	Sekunyir Mill	-	-	Seruyan and West Kotawaringin District – Central Kalimantan	Certified	23/11/2010	-
		Sekunyir						
		Seruyan Estate						
13	PT Swadaya Andika	Selabak Mill	-	-	Kotabaru District – South Kalimantan	Certified	16/03/2012	Mill closed down and all the supply bases was transferred to Rantau Mill – PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri – Rantau Factory certification.
		Selabak Estate						
		Randi Estate						
		Sangkoh Estate						
		Lanting Estate						
14	PT Bina Sains Cemerlang	Sungai Pinang Mill	-	-	Musi Rawas District – South Sumatera	Certified	11/09/2012	Remarks: Land legalisation process for 308.35 ha is still in process.
		Sungai Pinang Estate	-	-				
		Bukit Pinang Estate						
15	PT Teguh Sempurna	Pemantang Mill	-	-	Seruyan and East Kotawaringin District – Central Kalimantan	Certified	05/07/2011	-
		Pemantang Estate	-	-				
		Kawan Batu Estate						
		Hatan Tiring Estate						
		Batang Garing Estate						
16	PT Bhumireksa Nusa Sejati	Teluk Bakau Mill	-	-	Indra Giri Hilir District – Riau	Certified	11/10/2011	-
		Teluk Bakau Estate						
		Nusa Lestari Estate						
		Nusa Perkasa Estate						
		Mandah Mill						
		Mandah Estate						
		Rotan Semelur Estate						
						01/04/2014		

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17	PT Aneka Intipersada	Teluk Siak Mill	-	-	Pekanbaru, Siak District – Riau	Certified	11/10/2011	-
		Teluk Siak Estate						
		Pinang Sebatang Estate						
		Aneka Persada Estate						
18	PT Tamaco Graha Krida	Ungkaya Mill	-	-	Morowali District – Sulawesi Tengah	Certified	10/7/2012	-
		Ungkaya Estate						
		Plasma TGK Estate	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
19	PT SIME Indo Agro	Bukit Ajong Mill	-	-	Sanggau District – West Kalimantan	Certified	18/10/2010	Land legalisation process for East Est for 5815.64 ha is still in process.
		West Estate						
		East Estate						
		East* Estate /Sei Mawang Estate	2023	-		-		Land legalisation for Sei Mawang is still in process
		East Plasma Estate	-	-		Certified	18/7/2016	-
		West Plasma Estate						
20	PT Padang Palma Permai /PT Perkasa Subur Sakti	Blang Simpo Mill	-	-	Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam	Certified	03/05/2013	-
		Tamiang (PT PPP) Estate						
		Batang Ara (PT PSK) Estate						
		Blang Simpo-01 Estate						
		Blang Simpo-02 Estate						
21	PT Sandika Natapalma	Lembiru Mill	-	-	Ketapang District – West Kalimantan	Certified	03/07/2014	PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill i.e. Lembiru Mill.
		Lembiru Estate						

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		Awatan Estate						
		Karya Palma Estate	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		KKPA SNP Estate	TBC	TBC		TBC	TBC	
22	PT Budidaya Agro Lestari	Pelanjau (PT BAL) Estate	-	-	Ketapang District – West Kalimantan	Certified	03/07/2019	
		Sungai Putih (PT BAL) Estate	2023	-		-		Land Approval is obtained in 2015 while the other approvals are still in processing HGU obtained as per May 2018 KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Beturus (PT BAL) Estate	2023	-		-		
		KKPA BAL Estate	TBC	TBC		TBC	TBC	
23	PT Mitral Austral Sejahtera	MAS Mill	NA	NA	Sanggau District – West Kalimantan	NA	NA	The properties was sold and currently SDP have no control in the management. Please find latest information on 'Updates on PT MAS' worksheet and updates to RSPO Secretariat.
		MAS 1 Estate						
		MAS 2 Estate						
		MAS 4 Estate						
		Plasma MAS Estate						

SDP - RSPO Certification for Time Bound Plan – New Britain Palm Oil (NBPOL) Operations (as at March 2021)

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name						
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	-	Guadalcanal Province, Solomon Islands	Certified	18/03/2011	-
		Tetere Estate					
		Ngalimbiu Estate					
		Mbalisuna Estate					

		Smallholders – West Zone (83)					
		Smallholders – Central Zone (53)					
		Smallholders – MBA East Zone (59)					
		Smallholders – MBE East Zone (37)					
2	Milne Bay Estate (MEB)	Hagita Oil Mill	-	Milne Bay Province, PNG	Certified	15/02/2018	-
		Giligili Estate					
		Hagita Estate					
		Waigani Estate					
		Sagarai Estate					
		Padipadi Estate					
		Mariawatte Estate					
		Smallholders – East Gurney Estate (264)					
		Smallholders – West Gurney Estate (229)					
		Smallholders – East Sagarai Estate (157)					
		Smallholders – West Sagarai Estate (221)					
3	Poliamba (POL)	Poliamba Oil Mill	-	New Ireland Province, PNG	Certified	19/03/2012	-
		Kara Estate					
		Nalik Estate					
		West Coast Estate					
		Noatsi Estate					
		Madak Estate					
		Smallholders -North Division (615)					
		Smallholders- South Division (868)					
		Smallholders -West Division (309)					

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4	Ramu Agricultural Industrial Ltd (RAIL)	Gusap Mill	-	Morobe Province, PNG	Certified	05/08/2010	-
		Gusap East (Gusap) Estate					
		Gusap West (Paddock) Estate					
		Surinam Estate					
		Dumpu Estate					
		Ngaru Estate					
		J Estate (Jephcott) Estate					
		Smallholders - Madang VOPs (71)					
		Smallholders - Morobe VOPs (253)					
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	-	Oro Bay Province, PNG	Certified	01/02/2013	-
		Mamba Oil Mill					
		Embi Estate					
		Ambogo Estate					
		Sangara Estate					
		Sumbiripa Estate					
		Mamba Estate					
		Sambogo Estate					
		Scheme Smallholder Sorovi Division(2019)					
		Scheme Smallholder Saiho Division(842)					
		Scheme Smallholder Aeka Division (911)					
		Scheme Smallholder Igora Division (1367)					
Scheme Smallholder Ilimo Division (671)							
6	West New Britain (WNB)	Mosa Oil Mill	-		Certified	10/09/2008	-

		Kumbango Oil Mill		Kimbe, West New Britain, PNG			
		Kapiura Mill					
		Numundo Mill					
		Waraston Mill					
		Bebere Estate					
		Kumbango Estate					
		Togulo Estate					
		Dami Estate					
		Waisisi Estate					
		Kautu Estate					
		Karausu Estate					
		Moroa Estate					
		Bilomi Estate					
		Loata Estate					
		Haella Estate					
		Garu Estate					
		Daliavu Estate					
		Sapuri Estate					
		Malilimi Estate					
		Rigula Estate					
		Numundo Estate					
		Navarai / Karato ME /KDC EU Estate					
		Volupai / Lotomgam / Natupi / Goruru Estate					
		Lolokoru Estate					

		Ove Estate					
		Tamare Estate					
		Smallholders LSS Mosa (1822)					
		Smallholders VOP East (1817)					
		Smallholders VOP Central (1964)					
		Smallholders VOP West (1279)					
		Smallholders LSS Kapiura (551)					
		Smallholders VOP Kapiura (850)					
		Smallholder Kaulong / Akami / Pushiki / Repamira / Sakapei					
7	Markham Farms Company Limited (MFCL) / Markham Agro Pte Ltd	Erap Mill	-	Markham Farms	Certified	27/3/2020	There is total area NPP: 710.30ha which is currently excluded from the certification scope until the NPP is approved
		Munum Estate					
		Maralumi Estate					
		Erap Estate					

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 was none (0) Critical; none (0) Minor nonconformities and three (3) Opportunity For Improvement raised.

Below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	Nil	Issued Date	
Due Date		Closure Date	
Indicator & Category (Critical / Minor)			
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			

Opportunity for Improvements	
OFI #	Description
2201539-202205-I1	<u>Indicator 3.6.2</u> The maintenance of the safety features of the FFB ramp such as handrail, walkway and tractor reverse stopper at Jentayu Estate can be further enhanced.
2201539-202205-I2	<u>Indicator 4.4.1</u> The updating of information about actual legal use of land available in some of the land titles in Somme Estate could be further improved.
2201539-202205-I3	<u>Indicator 7.12.2</u> Perimeter area i.e., surrounding palms outlook and fencing structure at Jentayu Estate’s HCV pond can be further enhanced/maintained.

Positive Findings	
PF #	Description
PF 1	Very good cooperation and hospitality by management team/staff/sustainability team
PF 2	Prompt retrieval of relevant documents by the management team
PF 3	Good awareness on sustainability aspects among the workers and stakeholders

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2042487-202104-N1	Issued Date	22/04/2021
Due Date	26/05/2022	Closure Date	26/05/2022
Indicator & Category (Critical / Minor)	2.2.2 (Minor)		
Statement of Nonconformity:	Due diligence of contractors 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>Sg. Dingin Estate:</p> <p>The FFB Transporter, Noor Azizah Sedim Enterprise who have 3 lorry drivers transporting FFB from estate to mill. However, there are non-compliance by the contractor as below:</p> <ol style="list-style-type: none"> i. He did not make the correct EPF contribution for the workers as he only made contribution for the salary of RM 1,100. However, the workers' salary was RM 1,200. ii. No evidence to show that the SOCSO contribution was made for October 2020 and November 2020. iii. No contribution of EIS for the 3 workers since enforcement on January 2018. iv. The employment contract of the 3 workers are based on piece-rated under Clause 4. However, the contractor informed that the workers are under monthly rated. v. Terms and conditions of the employment contract such as notice period, annual leave, public holiday entitlement and medical leave were not available. vi. Reviewed the payslips and FFB Despatch by Field for September 2020, December 2020 and March 2021 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 did not pay as per Employment Act 1955, Section 60 (3) (b). Sampled of workers as below: 		

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	I/C No.	Date of Work on Rest Day	
	871224-02-56XX	13/09/2020, 20/09/2020, 27/09/2020, 06/12/2020,	
	810903-02-58XX	13/12/2020, 20/12/2020, 27/12/2020, 07/03/2021,	
	740520-02-64XX	14/03/2021, 21/03/2021 and 28/03/2021	
	Anak Kulim Estate:		
	Non-compliance of contractors as below:		
	AMZ Gemilang Enterprise:		
	<ul style="list-style-type: none"> i. The worker (I/C No.: 820215-02-57XX) as a backhoe driver was paying RM 1,100 per month as verified in the payslip from January 2021 – March 2021. However, the location of workplace is under Majlis Perbandaran Kulim where it shall be RM 1,200 per month. ii. EPF and SOCSO contribution made was incorrect where it made based on RM 1,100 wages where the actual wages of the workers are RM 1,200. iii. No evidence of EIS contribution was made. iv. The number of rest day was indicated wrongly at the number of public holidays in the payslip. 		
	Mayang Bayumas Sdn Bhd:		
	<ul style="list-style-type: none"> i. Employment contract which consists of terms and conditions such as type of wages, entitlement of annual leave, medical leave, public holiday, notice period, reason for dismissal and etc. was not available. 		
	Bukit Selarong Estate:		
	Non-compliance of contractor for the workers (I/C No.: 930903-02-53XX, 651122-02-58XX and 770623-02-61XX) as below:		
	Zaitunizan Binti Mahmud Husin:		
	<ul style="list-style-type: none"> i. The EPF contribution stated in the employment contract was incorrect where it stated 11% for employer. As to now, the employer should contribute 13% for salary less than RM 5,000. ii. EPF and SOCSO contribution made was incorrect where it made based on RM 1,100 wages where the actual wages of the workers are RM 1,200. iii. The deduction of EPF and SOCSO from the salary of workers are incorrect. As informed by the contractor, they deducted based on the request of workers but not the legal requirements. iv. Overtime limit has exceeded the allowable limit of 104 hours per month in accordance to Employment Act 1955. 		
	Corrections:	Brief to all contractor and ensure contractors comply with legal and others requirement. Contractors to submit documents and evidence related to estate management.	
	Root Cause Analysis:	<ul style="list-style-type: none"> 1. Monitoring on contract workers documentation not effective. 2. No responsible person in charge to monitor documentation of legal due diligence of contractors. 	

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Corrective Actions:	<ol style="list-style-type: none"> 1. Estate management together with RSQM department will conduct a briefing on Employment Regulation 1957 to all the contractor. 2. Estate management has appointed PIC (Assistant manager & CC) to monitor contract workers documentation. Appointed PIC will ensure hired contract & their workers should comply with Employment Regulation 1957 and Akta Keselamatan Sosial Pekerja 1969 and documented. The legal due diligence of contractors documents will be put on the list for monitoring and tracking on monthly basis.
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Implementation of the corrective action plan will be verified during next assessment.
Effectiveness Closure (for previous audit closed Critical NC):	<p>Evidence verified:</p> <ol style="list-style-type: none"> 1) Attendance records dated 16/06/2021 (Anak Kulim Estate), 08/12/2021 (Sg Dingin Estate), and 12/01/2022 (Bukit Selarong Estate) that show the briefing on Employment Regulation 1957 has been given to all the contractors. 2) Letters dated 16/07/2021 (Anak Kulim), 01/01/2022 (Bukit Selarong), and 01/01/2022 (Sg Dingin) that show the Assistant Managers or Chief Clerk had been appointed to monitor the compliance with legal requirements for contractors. 3) Pay slips of contractors' sampled workers that show the minimum wages, wages on rest day works, EPF, SOCSO, and EIS contributions have been paid according to the legal requirements. Further to that, no workers were found to have overtime work more than 104 hours. 4) Interview with the contractors and some of their workers also confirmed that the payments of wages and other contributions have been made appropriately by their employers. <p>The evidence of corrections and corrective actions were found to be adequate to close the Minor NCR. Effective continuous implementation shall be verified in the next assessment.</p>

Opportunity for Improvement	
OFI#	Description
2042487-202104-I1	<p>OFI Statement: Training on the GHG submission could be escalated to the person in charge in the mill.</p> <p>Verification / Follow-up actions: Training was made dated 28/06/2021 by the Group Sustainability Department Executive with presence of all PIC in the SDP Northern Units including SOU 01 estates and Sg Dingin Plm Oil Mill via online microsoft team. The subjects covered among others the following;</p> <ol style="list-style-type: none"> a) What is GHG b) RSPO Requirement on GHG c) GHG application and calculation in SDP d) Approach towards reducing GHG emission

	There was follow-up assessment for the participants to evaluate the understanding of the participants. The training materials and list of attendees were sighted and verified. Thus, it is concluded that the OFI was adequately addressed.
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3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1767947-201904-N1	Minor	5.1.2	26/04/2019	Closed on 01/07/2020
1767947-201904-N2	Minor	4.1.3	26/04/2019	Closed on 01/07/2020
1767947-201904-N3	Minor	5.6.3	26/04/2019	Closed on 01/07/2020
1923219-202006-M1	Critical	6.2.3	01/07/2020	Closed on 28/09/2020
1923219-202006-M2	Critical	6.7.3	01/07/2020	Closed on 28/09/2020
1923219-202006-N1	Minor	4.2.3	01/07/2020	Closed on 22/04/2021
1923219-202006-N2	Minor	7.3.1	01/07/2020	Closed on 22/04/2021
1923219-202006-N3	Minor	7.3.2	01/07/2020	Closed on 22/04/2021
1923219-202006-N4	Minor	7.3.3	01/07/2020	Closed on 22/04/2021
1923219-202006-N5	Minor	6.7.2	01/07/2020	Closed on 22/04/2021
2042487-202104-N1	Minor	2.2.2	22/04/2021	Closed on 26/05/2022

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 1 – Sungai Dingin Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

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)
Estate Healthcare Assistant	Somme Estate Clinic HCA (MA) Jentayu Estate Clinic HCA (MA)	Face to face interview

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Workers' union (NUPW) representative	NUPW	Face to face interview
Gender Committee Representatives	QA	Face to face interview
Foreign Workers' (FW) Representatives	All estates and mill FW	Face to face interview
Estate Shop Keeper/Contractor	Jentayu Estate Shop/Caterer	Face to face interview

Stakeholders comment	
1	<p>Feedbacks: Estate Healthcare Assistant (HCA/MA) Issue related to Covid-19 pandemic was handled well by management and all personnel. No serious positive case. No other viral case occurred since last audit.</p> <p>Audit Team verification and response: No further issue</p>
2	<p>Feedbacks: Local workers & foreign workers NUPW representatives No restrictions by management to all mill and estate employees to join union. Almost all local workers associated with NUPW while more than 50% foreign workers become member. Required fees paid by company with no issue.</p> <p>Audit Team verification and response: No further issue.</p>
3	<p>Feedbacks: Gender committee representatives All women employees are entitled to 3 months paid maternity leave without child limit. In case of any new mothers, the committee representative will take actions to address any needs that have been identified. All new mother needs are fulfilled including time for breastfeeding and breastfeed pumping etc.</p> <p>Audit Team verification and response: No further issue.</p>
4	<p>Feedbacks: Estate shop keeper No issue in contractual matters since company always give priority to locals and/or long-served contractor to provide service/contract work. Contract pricing fair to both parties for direct award contract unless involve tendering that need to be negotiated. Nevertheless, negotiated price for specific contract/tender work if awarded still fair to both parties.</p> <p>Audit Team verification and response: No further issue.</p>

List of land owner / user contacted – N/A					
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 Sime Darby acquired (freehold and leased) all the land directly from the state of Kedah State government.					

Previous land owner / user comment – N/A	
	Feedbacks:
	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.

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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 SOU 1 Sungai Dingin Palm Oil Mill and Supply Bases 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 SOU 1 Sungai Dingin Palm Oil Mill and Supply Bases is remain certified.</p>	
<p>Report prepared by</p>	<p>Acceptance of Assessment Conclusion</p>
<p>Name: Valence Shem</p>	<p>Name: SIME DARBY PLANTATION BERHAD (647766-V) LADANG PADANG BULUH / JERAI</p>
<p>Company Name: BSI Services Malaysia Sdn Bhd</p>	<p>Company Name: P.O. BOX 10, 08007 SUNGAI PETANI, KEDAH DARUL AMAN TEL 04-4212352 FAX 04-4251418</p>
<p>Title: Lead Auditor</p>	<p>Title:</p>
<p>Signature:</p> 	<p>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></p> <p>SIME DARBY PLANTATION BERHAD (647766-V) Ladang Padang Buluh / Jerai</p>  <p>Senior Manager (ERMI JAUHARI)</p>
<p>Date: 25/08/2022</p>	<p>Date: 25/08/2022</p>

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Based on the Estate Quality Management System; Sub-Section 5.5 Management Responsibility; Appendix 5.5.3.2 Procedure for External Communication; Version 1; Issue date: 1/1/2008, documents specified for mill and all estates within SOU 7 Certification Unit made available as per sample as following:</p> <ul style="list-style-type: none"> - Land titles/user rights - Occupational health and safety plans - Plans and impact assessments relating to environmental and social impacts - HCV documentation - Pollution prevention and reduction plans - Details of complaints and grievances - Continuous improvement plans - Public summary of certification assessment report - Group Sustainability Policy - Record of contributions to community development 	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Interview conducted on-site with sampled internal and external stakeholders confirmed that the information provided in appropriate languages and accessible to them.</p>	Complied

		<p>Information provided via direct communication during meeting as per latest sample as following:</p> <ul style="list-style-type: none"> - Latest Somme Estate external stakeholder consultation meeting; Date: 27/4/2022 - Latest Jentayu Estate external stakeholder consultation meeting; Date: 5/4/2022 - Sungai Dingin POM external stakeholder consultation meeting; Date: 18/5/2022 - Bukit Hijau Estate external stakeholder consultation meeting; Date: 23/5/2022 	
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 1 maintained records of request for information and responses as per sample sighted as following:</p> <p>Somme Estate request records:</p> <ul style="list-style-type: none"> - Request on info of Sunday work contract price by transporter Impian Serasi Enterprise during stakeholder meeting date: 27/4/2022 - Request on estate field housekeeping for pruning of palm by the roadside during stakeholder meeting date: 27/4/2022 <p>Jentayu Estate request records:</p> <ul style="list-style-type: none"> - Oil Palm Pal (OPP) system for housing repair request records latest received on 8/5/2022 and expected completion on 31/5/2022 <p>Sungai Dingin POM request records:</p> <ul style="list-style-type: none"> - Oil Palm Pal (OPP) system for housing repair request records latest received on 19/4/2022 and resolved on 20/4/2022 	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>Consultation and communication procedure documented as per established SPMS Appendix 5 Flowchart and Procedures on Handling Social Issues; Version #1; Issue # 1; Issue date: 1/4/2008; Previous briefing to all workers on 20/8/2020</p>	Complied

		Nominated representative of Sungai Dingin POM for relevant social issues is Mohd. Shazwan Afiq Bin Mod. Roffi; Assistant Manager as per letter of appointment dated 3/1/2022.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	The latest Stakeholders Lists for all operating units within SOU 1 sighted available as updated on March 2022. Information of stakeholders' details available included person in charge, address, e-mail and contact number for various stakeholders' category among internal and external stakeholders including local communities, authorities, vendors and neighbours etc.	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	SOU 1 has implemented policy on code of ethical conduct and integrity (Code of Business Conduct - COBC) which covered all operations in the plantation operation. Briefing session was given to all workers of audited operating units. For labour agent and contractors, Sime Darby has applied its Vendor COBC (30 May 2018), It includes the Fair Business practices-ensuring that we promote fair business practices and compete in an ethical manner, labour & human rights, ethics & management practices as per sample Vendor Integrity Pledge (VIP) and Vendor Code of Business Conduct (COBC); August 2020 as following: Somme Estate VIP COBC: - Em Impian Serasi Enterprise - AMZ Gemilang Enterprise - Mayang Byumas Sdn. Bhd.	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Monitoring including internal audit latest done for SOU 1 Sungai Dingin POM and estates on 4-8/4/2022. Internal audit conducted by internal auditors training led by Mohd. Saiful Bari Munir assisted by 4 internal auditors from HQ and regional SQM personnel.	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	<p>(C) The Unit of Certification complies with legal requirements</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>The mill & estates continue to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. Among the evidence of compliance verified were:</p> <p><u>Sungai Dingin POM:</u></p> <ul style="list-style-type: none"> - LEV Inspection, Report #HQ/18/JHII/00/00014-2922/007), dated 04/03/2022 - MPOB License #530978004000, valid until 30/06/2022 - Private installation from Energy Commission, #2020/02851, valid until 18/12/2022 - DOE License #003648, valid until 30/06/2022 <p><u>Somme Estate:</u></p> <ul style="list-style-type: none"> - MPOB License, #524666002000, valid until 31/10/2022 - Permit to store diesel, #K001367, valid until 15/01/2025 - CF air compressor, #KD PMT 902, valid until 27/10/2022 - Weighbridge calibration certificate, #B 1574790, valid until 24/06/2022 <p><u>Jentayu Estate:</u></p> <ul style="list-style-type: none"> - MPOB License, #523647002000, valid until 30/09/2022 - Permit to store diesel, #K002374, valid until 28/09/2024 - Permit to store diesel, #K002271, valid until 19/04/2023 - CF air compressor, #KD PMT 4724, valid until 27/06/2022 	Complied

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		<ul style="list-style-type: none"> - CF air compressor, #KD PMT 7995, valid until 27/06/2022 - Weighbridge calibration certificate, #D 004602, valid until 22/06/2022 <p><u>Bukit Hijau Estate:</u></p> <ul style="list-style-type: none"> - MPOB License, #524461002000, valid until 31/10/2022 - Permit to store diesel, #P:K003377, valid until 28/08/2022 - CF air compressor, #KD PMT 1261, valid until 16/08/2023 - CF air compressor, #KD PMT 80949, valid until 16/08/2023 - Weighbridge calibration certificate, #DE17 001044, valid until 08/09/2021 - Water Abstraction License, #WA2019020009, valid until 15/06/2022 	
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>Addressed in Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008. A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 1. PSQM Department and the respective operating units will undertake the responsibility of identifying, managing, updating, and tracking the legal requirement as well as monitoring the status of legal compliance.</p> <p>Tracking system is available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office.</p> <p>SOU 1 has established list of all relevant laws and requirement and documented in Legal and Requirement Register. The list was updated on annual basis or new updates on the register.</p>	Complied

2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 3 estates, during the field inspection confirmed that they were clearly marked and maintained. All the physical markers/Boundary stones along the legal boundaries between was visibly available.</p> <table border="1" data-bbox="1077 614 1870 1077"> <thead> <tr> <th></th> <th>Estate</th> <th>Field</th> <th>Coordinate</th> <th>Neighbours</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Somme</td> <td>P21A</td> <td>5.230448/100.628343</td> <td>Smallholder</td> </tr> <tr> <td>2</td> <td>Somme</td> <td>P13B</td> <td>5.22693/100.633448</td> <td>Smallholder</td> </tr> <tr> <td>3</td> <td>Somme</td> <td>P13B</td> <td>5.227081/100.632649</td> <td>Ldg KEDA</td> </tr> <tr> <td>4</td> <td>Jentayu</td> <td>P21B</td> <td>5.771559/100.562673</td> <td>Hutan Sungkup</td> </tr> <tr> <td>5</td> <td>Jentayu</td> <td>P07JB</td> <td>5.777997/100.625068</td> <td>Smallholder</td> </tr> <tr> <td>6</td> <td>Jentayu</td> <td>P09B</td> <td>5.757354/100.635720</td> <td>Kg Perak</td> </tr> <tr> <td>7</td> <td>Bkt Hijau</td> <td>P10A</td> <td>84 degree 24' 00"</td> <td>Kg Batu 7</td> </tr> <tr> <td>8</td> <td>Bkt Hijau</td> <td>R16A</td> <td>354 degree 36' 40"</td> <td>Kg Surau</td> </tr> <tr> <td>9</td> <td>Bkt Hijau</td> <td>16BC</td> <td>180 degree 28' 42"</td> <td>Kg Seputeh</td> </tr> </tbody> </table>		Estate	Field	Coordinate	Neighbours	1	Somme	P21A	5.230448/100.628343	Smallholder	2	Somme	P13B	5.22693/100.633448	Smallholder	3	Somme	P13B	5.227081/100.632649	Ldg KEDA	4	Jentayu	P21B	5.771559/100.562673	Hutan Sungkup	5	Jentayu	P07JB	5.777997/100.625068	Smallholder	6	Jentayu	P09B	5.757354/100.635720	Kg Perak	7	Bkt Hijau	P10A	84 degree 24' 00"	Kg Batu 7	8	Bkt Hijau	R16A	354 degree 36' 40"	Kg Surau	9	Bkt Hijau	16BC	180 degree 28' 42"	Kg Seputeh	Complied
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<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>The mill and estates in SOU 1 have listed and maintain all contracted parties and documented in List of Stakeholder as parts of their stakeholders includes internal such as employee and workers union and external stakeholders such as FFB suppliers, local community heads, government agencies. Documented lists were made available for verification at all the sampled operating units.</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 contracted parties/vendors were required to signed Vendor Integrity Pledge (VIP) and to comply with all applicable laws and regulations related anti-bribery, fraud and corruption and Vendor Code of Business Conduct (VCOBC) such as labour and Human Rights.</p> <p>Memorandum of Agreement (MOA) were also verified for sampled contractors which contained specific clauses on meeting applicable legal requirements to be demonstrated by them.</p>	Complied
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>Based on verification of the signed contract agreements, Clause 5.4 is referred to the restriction of child labour & protecting the rights of children available in the Vendor COBC and Human Rights Charter protecting the rights of children.</p>	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>Sungai Dingin POM receives RSPO Certified FFB from the 7 estates within the SOU 01 Certification Unit Sg Dingin / Somme / Bkt Hijau / Anak Kulim / Jentayu / Bkt Selarong / Padang Buloh. Inclusive are the certified crop diverted from its sister certification unit SOU 02 estates in event of any breakdown. The mill also receives non-certified FFB from third parties (out-growers and collection centres). The mill possessed all required information for all the suppliers, and it was available for verification.</p> <ul style="list-style-type: none"> a) All FFB from the SDP estates supported by the delivery documents. b) Valid land title with ownership status (refer indicator 4.4.1) c) Valid MPOB licence (refer criteria indicator 2.1.1) d) All delivery documents were verified with volumes of FFB received by the mill. 	Complied

2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>The mill also receives non-certified FFB from third parties (out-growers and collection centres). The mill possessed all required information for all the suppliers, and it was available for verification.</p> <ul style="list-style-type: none"> a) All FFB from the suppliers were supported by the delivery documents. b) Valid land title with ownership status (refer indicator 4.4.1) c) Valid MPOB licence (refer criteria indicator 2.1.1) d) All delivery documents were verified with volumes of FFB received by the mill. <p>The mill is also in progress of collecting the required information from the suppliers of the collection centres.</p>	Complied
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>			
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The business plan for the mill is reflected in the form of annual budget (MPLAN) and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilization rate and CAPEX.</p> <p>The business or management plan for the estates were presented in the form of annual budget (MPLAN) with 4 years projection (2023 – 2026). The annual budget contains the crop projection and the finance allocation for field operation and administrations. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.</p>	Complied

3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>The estates have prepared the replanting programme with minimum of 5 years projection. The review of the programme is done at the end of every year. Below are the details of the programme:</p> <table border="1" data-bbox="1061 475 1937 726"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="5">Ha</th> </tr> <tr> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>Somme</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Jentayu</td> <td>110.37</td> <td>0</td> <td>152.84</td> <td>170.60</td> <td>76.37</td> </tr> <tr> <td>Bukit Hijau</td> <td>227.15</td> <td>178.94</td> <td>113.36</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	Year	Ha					2023	2024	2025	2026	2027	Somme	0	0	0	0	0	Jentayu	110.37	0	152.84	170.60	76.37	Bukit Hijau	227.15	178.94	113.36	0	0	Complied
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3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>The operating units have their planned interval i.e., annually, for conducting their management review meetings. Management review meeting for the operating units were last conducted on 26/04/2022 (Sungai Dingin POM), 14/05/2022 (Somme Estate), 09/04/2022 (Jentayu Estate) and 22/04/2022 (Bukit Hijau Estate). The meetings were chaired by the managers of the operating units and attended by the key personnel.</p> <p>Among the agenda discussed were:</p> <ul style="list-style-type: none"> • Results of internal audit – Agenda 5 • Customer feedback - Agenda 7 • Status of preventive and corrective actions - Agenda 5 • Follow-up actions from previous management review - Agenda 2 • Changes that could affect management system - Agenda 9 • Recommendations for improvement - Agenda 10 	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>																																

<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -</p>	<p>The continual improvement plans were established. The documents were being maintained and updated with the assistance and guide from Sustainability Department. SDPB is committed to utilise the established system to regularly monitor and review their key activities at the mill and estates. Relevant action plans were initiated to continuously improve its key areas of operations, environmental, safety, health and welfare of the workers as well as social contribution to the community. Among others the continual improvement plans reviewed were:</p> <ul style="list-style-type: none"> a) Pollution Prevention Plan – 2022. b) Identification and Management of Wastewater – 2022. c) Waste Management Plan – 2022. d) Environmental Improvement Plan - 2022. e) Water reduction Plan - 2022. f) Safety and Health Program - 2022 <p>In Sg Dingin CU the yield performance, extraction ratios and production costs have always been in utmost priority in ensuring long-term economic and financial viability. In general, various efforts had been made to optimize the yield of the plantation among others;</p> <ul style="list-style-type: none"> a) maximizing crop recovery, optimum ripeness b) standard (harvest ripe bunches only and 100% loose fruit collection), c) the soil fertility was maintained and planting only high yielding planting material. d) To mechanize operation where feasible to reduce reliance of labour. <p>Other initiative of continuous improvement made in the SOU 01 units among others as summarized below;</p> <table border="1" data-bbox="1137 1337 1872 1391"> <thead> <tr> <th colspan="3">Sg Dingin POM</th> </tr> <tr> <th>Date</th> <th>Activities</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Sg Dingin POM			Date	Activities	Description				<p>Complied</p>
Sg Dingin POM												
Date	Activities	Description										

1	2022	Operation	EFB yard roofing RM350K
2	2025	Environment	Biogas Plant Installation RM11M
3	2022	Social	Ceiling fan - workers house RM100K
Jentayu Estate			
1	2022	Social	Tube well water supply RM200K
2	2023	Operation	Ramp replacement RM60K
3	2024	Social	6 units workers qrts - RM600K
4	2025	Social	6 units workers qrts - RM600K
Somme Estate			
1	2023	Social	Staff houses roofing replacement RM400K
2	2023	Operation	Box culvert installation RM45K
3	2024	Operation	Drainage along terrain RM56K
Bkt Hijau Estate			
1	2022	Operation	Drone spraying nursery RM10K
2	2022	Operation	MTFA - Manuring RM230K
3	2022	Operation	Landsurf - FFB infield RM271K

Continuous improvement is established covering the social, environmental and safety impacts in the operating units. The action plan established based on the SIA, EAI/EIE, Social Dialog, Workers Grievances etc. Among the plan established such as:

1. To continuously brief workers about their benefits, entitlement, salary calculation and ex-gratia payment.
2. EWR members will inspect any damage of the housing quarters and report to the management team to take action
3. Create further awareness on recycling among the through training and recycling campaigns
4. Monitoring by photo with date of terracing in the field

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3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: 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>5. Workers housing inspection to ensure no illegal wiring</p> <p>The Certification Unit has filled its RSPO metrics template version 2.1 and submitted to the CB prior to this assessment. The input data was found to be accurate based on the following records verification:</p> <ul style="list-style-type: none"> • SAP accounting system • Land titles • Complaints & grievance records • Dept. of Safety & Health’s JKPP8 form 	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 available for the Palm Oil Mill and the Estates. Palm Mill holds two SOPs:</p> <ol style="list-style-type: none"> 1. Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill. 2. Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) to includes mill SOPs. Sighted SOP for fruit handling station, sterilization station, threshing station, pressing station, kernel recovery station, boiler station and effluent treatment plant. <p>Estates have a separate SOP which is SOP EQMS, Pictorial Safety Standard, Estate Quality Management System and Agricultural reference Manual that covered planting material, nursery techniques, replanting, land preparation, planting density, canopy management, water management, harvesting, loose fruit collection, weed control and transport.</p>	Complied

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3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>Apart from daily routine supervision, among the other mechanism to check consistent implementation of the procedures are visits by Mill Advisor and Plantation Advisor, visit by the agronomist, internal audit, site inspection by the SHO, ESH visit, and SORA visit to name a few.</p>	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>The sampled operating units maintain all records of monitoring and available for review. Among the records verified but not limited to were:</p> <ul style="list-style-type: none"> - Mill Advisor (MA) and Plantation Advisor (PA) report where the performance of compliance towards the SOP, Budget and Productivity are reported - Various checklists used by the estates and mill for operations - Health and safety monitoring - Line site Inspections (Weekly) - Work Site Inspections (Quarterly) - Crop Quality Assessment by SQM (6 Months) - Plantation Management Unit (Yearly) - Internal Audit (Yearly) - Environment, Safety & Health Visit (As and When Required) - Structured Oil Recovery Assessment (SORA) – (6 Months) 	Complied
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting in all sampled estates within SOU 1. Social aspects and impacts of existing operations based on Social Impact Assessment (SIA) Report SOU 1 Sungai Dingin; Assessment Date: 23/2 – 5/3/2015 by Social & Environment Projects Unit, PSQM Department. All aspects and impacts mitigated and monitored with participatory consultation with internal and external stakeholders.</p>	Complied

<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Somme/Anak Kulim Estate SOU 1 Updated: 11/5/2022 Management Plan on Social Impact Assessment amongst all as per sample as following:</p> <ul style="list-style-type: none"> - Action on contractor price rate for Sunday work - Action on roadside palm pruning; Completed on 30/4/2022 - Enforcement on feedstock rearing within housing complex; Date: 15/4/2022 <p>Jentayu Estate SOU 1 FY 2022 Management Plan on Social Impact Assessment amongst all as per sample as following:</p> <ul style="list-style-type: none"> - To review social impacts and to implement plan to mitigate the negative impacts and promote the positive ones: - To ensure compliance to SOP and legal requirement regarding social - To contribute to local communities development - To reduce disturbance of stray dogs in residential area - To ensure workers health in good condition <p>Sungai Dingin POM Management Plan on Social Impact Assessment updated May 2022:</p> <ul style="list-style-type: none"> - To provide separate washroom for female staff in office; Completed on 11/3/2022 - To provide new worker for female employee; In progress - To repair football field fencing; Completed - Upgrade of living standard with provision of complete workers housing furniture and appliances; Expected completion December 2022 - Oil Palm Pal (OPP) housing repair system QR code sticker for every house - 253 unit ceiling to all workers; on-going 	<p>Complied</p>
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		Bukit Hijau Estate Management Plan on Social Impact Assessment updated 18/3/2022: <ul style="list-style-type: none"> - External Stakeholder: Action to assist neighbour estate (Evergreen Estate) on MSPO certification; Date: 22/4/2021 - Internal Stakeholder (NUPW Rep.): Action to consistently provide PPE to all workers every 6 months or upon required 	
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -	Social monitoring plan implemented and monitored as per sample latest implementation of Oil Palm Pal (OPP) Digital Housing Complaint System Effective from December 2021 in SOU 1.	Complied
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented as the SOP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liaison and recruitment, documentation and processing (Doc no: WMU/DP SOPP/JAN2016/R1), workforce management centre (WMC) Sua Betong, Careline and estate are available upon request. Additionally, there's Sungai Dingin POM SOP Hiring of Local Workers; Doc. # 01-12-19; Rev. # 1; Effective date: 1/12/2019.	Complied
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Employment procedures are well implemented with records well maintained as per information reported in indicator 6.1.1 to 6.6.2 below.	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	The mill and estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard	Complied

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	<p>- Critical (Major) compliance -</p>	<p>identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following:</p> <ul style="list-style-type: none"> - Change in work process - Revision/changes in legislative requirement - Occurrence of accidents <p>Based on the risk assessments, appropriate risk control measures were determined and implemented for the respective activities and operation. Verified the implementation of the management plan as follows:</p> <p>Somme Estate</p> <ul style="list-style-type: none"> • Latest CHRA was done on 15/10/2020 by competent person with DOSH reg. no. HQ/09/ASS/00/124 • Last medical surveillance for workshop workers was conducted on 22/03/2022 by OHD with reg. no. HQ/08/DOC/00/545. Refer report no. 062/OHD/2021. <p>Jentayu Estate</p> <ul style="list-style-type: none"> • Latest CHRA was done on 19/10/2020 by competent person with DOSH reg. no. HQ/09/ASS/00/124. • Baseline Chemical Exposure Monitoring for workshop was conducted on 29/04/2021 by an authorised Hygiene Tech (Reg.# HQ/17/JHI/00/00012) – ref. report no. HQ/09/ASS/00/124-2020/005. The result was within the Permissible Exposure Limit (PEL), thus, based on CHRA recommendation, no medical surveillance required for relevant employees. Nonetheless, the estate still carried out a Medical Surveillance for Occupational Chemical Exposure for the workshop personnel on 11/04/2022 with an OHD (reg.# HQ/OHD(R)/21/01490 and the personnel were found to be fit to work in current work area. 	
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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>As mentioned in Indicator 3.6.1, the CU has established and documented safety and health plan. Basically, the plans were derived from risk assessments such as HIRARC, CHRA, NRA, to name a few. The effectiveness of the plans was monitored in many ways such as:</p> <ul style="list-style-type: none"> - Internal audit - Workplace inspection (including field supervision) - Accident & incident reporting - Medical surveillance - Chemical exposure monitoring - Audiometric test - LEV performance monitoring (fume hood) <p>Nonetheless, the maintenance of the safety features of the FFB ramp such as handrail, walkway and tractor reverse stopper at Jentayu Estate can be further enhanced. (OFI)</p>	OFI																																	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.																																				
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The annual training program 2022 has been established and significantly covers all aspects of the MSPO/RSPO requirements. There were also additional subjects including the estate operating procedures, parameters, vehicles maintenance etc. The training program also specified the target group of employees to be trained under the allocated subjects. The program mainly covers both requirement of the estates and mill in SOU 01. The subjects for the training are issued and assisted by the RSQM personnel. The following topics included in the annual training program 2022 among others as follows;</p> <table border="1" data-bbox="1128 1187 1861 1398"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">(Estate) subject</th> <th colspan="3">schedule</th> </tr> <tr> <th>1-4</th> <th>5-9</th> <th>9-12</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SDP Policies / Charters</td> <td>-</td> <td>-</td> <td>/</td> </tr> <tr> <td>2</td> <td>Requirement RSPO MSPO & SCCS</td> <td>-</td> <td>/</td> <td>-</td> </tr> <tr> <td>3</td> <td>ESH objective, target & program</td> <td>/</td> <td>-</td> <td>-</td> </tr> <tr> <td>4</td> <td>New FW – Induction Program</td> <td>/</td> <td>/</td> <td>/</td> </tr> <tr> <td>5</td> <td>Duties of field staff</td> <td>/</td> <td>-</td> <td>-</td> </tr> </tbody> </table>		(Estate) subject	schedule			1-4	5-9	9-12	1	SDP Policies / Charters	-	-	/	2	Requirement RSPO MSPO & SCCS	-	/	-	3	ESH objective, target & program	/	-	-	4	New FW – Induction Program	/	/	/	5	Duties of field staff	/	-	-	Complied
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3.7.2	Records of training are maintained. - Minor Compliance -	<p>The estates and mill training are held/organized during the daily briefing prior to work commencement. Mainly the issues discussed/briefed were related to estate and mill operations, environmental and safety compliance. These training records are maintained and were sighted during the audit.</p> <table border="1"> <thead> <tr> <th></th> <th>Sg Dingin POM - Subjects</th> <th>Date</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SOP /Policy to Contractors</td> <td>16/11/21</td> <td>-</td> <td>-</td> </tr> </tbody> </table>		Sg Dingin POM - Subjects	Date	Date	Date	1	SOP /Policy to Contractors	16/11/21	-	-	Complied																																																																																																									
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		3	RSPO Briefing to employees	-	08/3/22	14/12/21	
		4	Harvesting safety awareness	26/11/21	20/12/21	07/10/21	
		5	Tractors driving SOP	12/11/21	09/5/22	02/7/21	
		6	OSH guidelines Sime Card	-	26/10/21	-	
		7	RSPO MSPO awareness	02/2/21	10/3/22	06/1/21	
		8	Workshop management	-	14/1/22	21/1/22	
		9	Spraying SOP	12/2/21	23/12/21	02/9/21	
		10	Nursery Operations	24/11/21	10/11/21	16/1/21	
		11	Harvesting SOP	24/7/21	10/11/21	18/1/22	
		12	Harvesting Safety awareness	26/2/21	22/12/21	19/11/21	
		13	Fire Drill	30/3/21	29/3/22	17/3/22	
		14	Fire Drill	29/3/22	22/2/21	15/7/21	
		15	First Aid - Refresher briefing	09/2/21	11/9/21	10/11/21	
		16	FFB quality	-	12/1/22	29/12/21	
		17	Hazard / OSH Awareness	-	14/12/21	08/2/22	
		18	Harvesting SOP	27/11/21	17/9/21	29/12/21	
		19	EFB Application	-	07/2/22	19/1/22	
		20	Pesticides Handling	25/2/22	23/12/21	18/11/21	
		21	Chemical spraying	01/9/21	20/1/22	26/8/21	
		22	Replanting	26/2/21	26/4/22	10/1/21	
		23	First Aid Kit & ERP handling	04/3/21	23/2/22	14/12/21	
		24	IPM management	02/3/22	16/5/22	20/12/21	
		25	Working hours	16/3/21	06/1/22	29/4/21	
		26	Protection -HCV riparian zone	21/9/21	19/5/22	20/01/22	
		27	fertilizer - application	24/7/21	22/12/21	22/1/22	
		28	Harvesting activities SOP	22/3/22	-	09/3/22	
		29	Driving SOP & PPE	23/3/22	05/1/22	02/2/22	
		30	Passport retention/ Line site	-	09/2/22	8/3/22	
		31	PPE adherence	27/11/21	23/12/21	14/4/21	
		32	SW management	12/4/21	13/6/21	28/3/22	
		33	Human Rights -FW/local	15/3/22	13/5/22	29/4/22	
		34	Covid 19 reminders -MCO	31/7/21	15/12/21	29/4/21	
		35	Sexual harassment / COBC	09/3/22	31/3/22	03/1/21	

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		<table border="1"> <tr> <td>36</td> <td>Security management</td> <td>27/11/21</td> <td>08/3/22</td> <td>22/1/22</td> </tr> <tr> <td>37</td> <td>ILO - Compliance</td> <td>09/3/22</td> <td>21/2/22</td> <td>29/4/21</td> </tr> <tr> <td>38</td> <td>TKI induction program</td> <td>25/8/21</td> <td>20/4/22</td> <td>29/4/21</td> </tr> <tr> <td>39</td> <td>GHG/SCCS</td> <td>28/6/21</td> <td>28/6/21</td> <td>28/6/21</td> </tr> <tr> <td>40</td> <td>Hearing / Safety awareness</td> <td>03/9/21</td> <td>9/12/21</td> <td>25/1/22</td> </tr> </table>	36	Security management	27/11/21	08/3/22	22/1/22	37	ILO - Compliance	09/3/22	21/2/22	29/4/21	38	TKI induction program	25/8/21	20/4/22	29/4/21	39	GHG/SCCS	28/6/21	28/6/21	28/6/21	40	Hearing / Safety awareness	03/9/21	9/12/21	25/1/22	
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3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Training was made dated 28/06/2021 by the Group Sustainability Department Executive with presence of all PIC in the SDP Northern Units including SOU 01 via online Microsoft team covering among others the following:</p> <ul style="list-style-type: none"> a) RSPO Supply chain standard 2020 /MSPO supply chain 2018 b) Shared responsibilities / Role of responsibilities person c) Supply chain model / Refinery and traders d) New changes - Verification of inputs and outputs e) Documented procedures / Record keeping f) Registration of transaction /claims / conversion factors g) Management Review h) Outsourcing / Complaints / Communication and claims i) Supply chain flow chart / RSPO Palm Trace <p>Training slides and attendees list were sighted and verified.</p>	Complied																									
Criterion 3.8: Supply chain requirement for mills																												
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</p>	<p>The mill receives RSPO Certified FFB from certified sources and third parties' crops. The mill is certified with Mass Balance modules and thus, this is not applicable.</p>	Not Applicable																									

	<p>against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>		
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>The mill is declared to be Mass Balance module since it receives FFB from both certified and non-certified sources. As per the Standard Operating Procedure (SOP) for Sustainable Supply Chain & Traceability, Version 2 dated April 2019, The mill is certified under Mass Balance module.</p>	Complied
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. The actual tonnage produced from last audit date (Apr 2021– Mar 2022) reported in the summary in Table 6 of this report.</p>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The registration of PalmTrace will be carried out by the Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Company has registered their mill in the PalmTrace:- Members ID – Sungai Dingin Oil Mill: RSPO_PO1000000104 Licence valid until 11/09/2022 Member category: Oil Mill</p>	Complied

		Details of palm trace transaction summarized in Table 11A of the report.	
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> <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>Sime Darby Plantation has developed Plantation Quality Management System – Sustainable Plantation Management System, Appendix 15, Standard Operating Procedure (SOP) for Sustainable Supply Chain & Traceability, Version 2 dated April 2019.</p> <p>The procedure was established which covers responsibility, reporting of certified CPO/PK, non-conforming products and/ or documents, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, record keeping, training, complaints, management review and product claim.</p> <p>The mill has conducted SCCS SOP & Policy training to the critical control point personnel such as weighbridge operator, auxiliary police, drivers, clerks and QA supervisor. Details of training are described in Indicator 3.7.1.</p> <p>The Mill Manager as Head of Operating Unit have the overall responsibility for the implementation of SOP, and he may assign roles to relevant personnel or invite personnel from various departments necessary to assist in the SOP implementation.</p>	Complied
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. 	<p>Internal audit conducted based on the Sustainable Plantation Management System, Appendix 15, Standard Operating Procedure (SOP) for Sustainable Supply Chain & Traceability, Version 2 dated April 2019. Internal Audit Procedure, Doc. No.: SD/SDP/PSQM/IAP, Rev. 2 dated 01/11/2017 was established where the internal audit shall be conducted at least once a year.</p> <p>The latest Internal Audit for MSPO & RSPO SCCS was conducted by GSD Malaysia & Northern RSQM on 05/04/2022. There was 1 major non-</p>	Complied

	<p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>conformance raised with regards to supply chain. Root cause was identified to establish appropriate corrective action. The non-conformance was closed and verified by the auditor.</p>	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>The daily records are prepared at the entry point at the weighbridge. When FFB is delivered to the mill from the estates, the transporters present the Delivery Order (DO) to the mill weighbridge clerk for the FFB to be received by the mill. The mill weighbridge clerk then checks on the Certified Status of the incoming FFB (RSPO Number & RSPO License Validity Period). Daily summary and monthly summary were documented for all the incoming certified FFB.</p> <p>The mill received FFB from sister estates and purchased from outside FFB suppliers. The records of FFB received was recorded in FFB delivery/consignment note, FFB weighbridge ticket and summarize in the Mass Balance sheet.</p> <p>The management will inform CB if there are any overproduction of certified tonnage. They are aware on the overproduction as per stated in the procedure. Based on last review period, no overproduction recorded.</p> <p>Addressed in the SOP clause 11.0 Non-conforming Products and/or Documents. Based on the procedure, where there is contamination of RSPO certified material during receiving, processing, storage and dispatch, the mill shall downgrade the materials in such order: IP to MB to conventional.</p> <p>Material received with insufficient information shall be treated as non-conforming documents. The documents shall be investigated, verified, and corrected to allow processing of material. Authorization for release shall be by the mill manager.</p>	<p>Complied</p>

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		<p>E.g. of information available in the mill’s weighbridge tickets are as follows:</p> <p>a) FFB Supplier: Somme Estate (RSPO Certified)</p> <ul style="list-style-type: none"> - Date: 24/05/2022 - Product: FFB - Delivery Ticket Number: 1079 - RSPO Cert No: RSPO 550179 - Vehicle Number: DDU 669 - Tonnage: 9.95 Mt <p>b) FFB Supplier: Jentayu</p> <ul style="list-style-type: none"> - Date: 24/05/2022 - Product: FFB - Delivery Ticket Number: 14624 - Vehicle Number: KDE 2826 - Tonnage: 16.54 mt - RSPO Cert Number: RSPO 550179 	
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> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; 	<p>Sungai Dingin POM ensured the required information is available in document form. Verified the sampled Dispatch Delivery Notes as follows:</p> <p>1. Sales of PK as RSPO Certified Product</p> <ul style="list-style-type: none"> a) The name and address of the buyer (<i>undisclosed</i>) b) The name and address of the seller: <ul style="list-style-type: none"> - Sime Darby Plantation Berhad, KKS Sg. Dingin, P.O Box 202, 09700 Karangan, Kedah Darul Aman. c) Shipment / delivery date: 20/05/2022 d) The date on which the documents were issued: 20/05/2022 e) RSPO certificate number: RSPO 550179 f) A description of the product, including the applicable supply chain model: Palm Kernel-RSPO MB g) The quantity of the products delivered: 34.82 mt h) Any related transport documentation: <ul style="list-style-type: none"> - Collection Order (PK No. 49684), Kernel Dispatch Inspection) 	Complied

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	<ul style="list-style-type: none"> 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"> a) A unique identification number: DO #027429 b) Contract Number: - S/PSD/2205/PK0143, ordered quantity 385 mt 2. Sales of CPO as RSPO Certified Product a) The name and address of the buyer (<i>undisclosed</i>) b) The name and address of the seller: - Sime Darby Plantation Berhad, KKS Sg. Dingin, P.O Box 202, 09700 Karangan, Kedah Darul Aman. c) The loading or shipment / delivery date: 26/04/2022 d) The date on which the documents were issued: 26/04/2022 e) RSPO certificate number: RSPO 550179 - A description of the product, including the applicable supply chain model: Crude Palm Oil (CPO) RSPO MB f) The quantity of the products delivered: 40.38 kg g) Any related transport documentation: - Collection Order (PK) & Dispatch Meter Reading h) A unique identification number: DO #027371 i) Contract Number: S/PSD/2205/CPO0117; Order Quantity 250 mt 	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where the 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 	<p>The mill does not outsource any of its milling activities to any third party. With regards to the contracted CPO and PK transporters, it is stated in the contract agreement between Sungai Dingin POM and the contractors in Annexure 5, RSPO Supply Chain Certification Standard, that the site has legal ownership of all input material to be included in outsourced processes.</p>	Complied

	<p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>		
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.	Details of contractors are available in the list of contractors.	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.	The list of contractors is updated from time to time by the mill. The information of any newly appointed contractor is shared with BSI through pre-audit information request prior to the audit. The information is provided to the assessment team.	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>i) All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible.</p> <p>ii) The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 in Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019.</p> <p>iii) NA as the mill is using MB model</p>	Complied

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	<p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>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>a) All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are recorded on a three-monthly basis in the mill's mass balance accounting sheet. The data was mostly sourced from the mill's Daily Production Report.</p> <p>b) Based on the mass balance accounting sheet, the volume of certified CPO and PK that were delivered were correctly deducted from the accounting.</p> <p>c) For the period under review, the mill had always delivered their Mass Balance sales from positive stocks. This was verified through their mass balance accounting as well as transaction records in the PalmTrace.</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>Conversion factor of CPO and PK production is depending on the actual OER and KER. Nonetheless, in forecasting the future productions, the OER and KER are estimated based on past experience and performance. It was verified that the estimated OER and KER mentioned in Table 10 are in line with the mill's previous performance.</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>The facility is using the actual extraction rate and therefore updating of rates is not necessary. Nonetheless, in forecasting the future productions, the OER and KER are estimated based on past experience and performance. It was verified that the estimated OER and KER mentioned in Table 10 are in line with the mill's previous performance.</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</p>	<p>NA as the mill is using MB module.</p>	Complied

	palm products, including during transport and storage to strive for 100% separation.		
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>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>i) The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace.</p> <p>ii) RSPO certified volumes sold under different scheme or as conventional were not registered in the RSPO PalmTrace.</p>	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	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 the mill and this was 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> <p>a. Display its RSPO membership status</p> <p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p> <p>d. State the member's history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p>	Not applicable as no off-product claim made by the mill as to date.	Not Applicable

	Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable as no off-product claim made by the mill 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 the mill 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 the mill and this was 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.	Business to business communication is through the delivery documents. There is no use of trademark logo. Only the communication with RSPO certification number and supply chain model sighted in the weighbridge tickets.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by	Not applicable as the mill is not a distributor or wholesaler.	Not Applicable

	<p>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>		
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	NA	Not Applicable
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	NA	Not Applicable
	<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>	NA	Not Applicable
Labelling and trademark (IP)			
	<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 	NA	Not Applicable

	<p>shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</p>		
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	<p>NA</p>	<p>Not Applicable</p>
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>Oil palm content for CPO and PK containing 100% RSPO MB-certified.</p>	<p>Complied</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 non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>No non-certified oil palm within the product of RSPO-MB certified for CPO and PK.</p>	<p>Complied</p>
<p>Labelling and trademark (MB)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	<p>No RSPO label used by the mill in any of form of marketing i.e., on pack communication and promotional material.</p>	<p>Complied</p>

Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	No storytelling in and off product-related communications made by the mill.	Complied
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 1 has implemented the Sime Darby’s Human Rights Charter where they committed to recognizing the role of Human Rights Defenders in accordance to the United Nations declaration on Human Rights Defender. Awareness and training to all workers in order for them to understand their responsibility in respect of human rights were conducted as per latest sample as following:</p> <ul style="list-style-type: none"> - Latest Somme Estate external stakeholder consultation meeting; Date: 27/4/2022 	Complied

		<ul style="list-style-type: none"> - Latest Jentayu Estate external stakeholder consultation meeting; Date: 5/4/2022 - Sungai Dingin POM external stakeholder consultation meeting; Date: 18/5/2022 - Bukit Hijau Estate external stakeholder consultation meeting; Date: 23/5/2022 	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Based on the interview of internal stakeholders among workers as well relevant external stakeholders, the mill and estates within SOU 1 do not instigate violence or use any form of harassment in their operations.</p>	Complied
<p>Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the records of complaints and grievances no issue of whistle-blowing that requires anonymity of complainants and/or grievance parties within SOU 1. Interview conducted with internal stakeholders among workers and relevant external stakeholders also confirmed the information.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</p> <p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.</p> <p>Latest complaint and/or grievance channels available including Oil Palm Pal (OPP) for workers' housing repair request or complaint, Suara Kami for workers grievances, ULULA as a Digital Worker and Community Engagement platform and whistleblowing, as in Sime Darby Plantation</p>	Complied

		website, where a whistleblowing e-form provided as a mechanism for reporting, investigating and remedying any wrongdoing.	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	Neither any complaints nor land dispute occurred in the SOU 1 Certification Unit since the last audit.	Complied
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 -	The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow.	Complied
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 -	Contributions made as per sample as following: Somme Estate CSR: - Tahlil prayers and fasting break event between GM, Managers and Assistant Managers with all workers; Date: 26/4/2022 - Zakat fitrah program with Imam Masjid Kampung Badlishah; Date: 24/4/2022 - Booster vaccine program for all employees; Date: 10/3/2022 Sungai Dingin CSR: - Aidilfitri donation to Kampung Karang villagers; Date: 21/5/2022	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	(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.	No customary land in all estates within SOU 1. Documents showing legal ownership available as per sighted as following:	OFI

	<p>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>	<ul style="list-style-type: none"> - Sungai Dingin POM located within Sungai Dingin Estate Land Title # 57873; District: Kulim; Sub-district: Mukim Sedim. <p>Somme Estate total land titles: 115 as per samples sighted as following:</p> <ul style="list-style-type: none"> - Land title # 1127; District: Bandar Baharu; Sub-district: Mukim Serdang; Lot # 976; Area: 3.0857 ha - Land title # 32705; District: Kulim; Sub-district: Mukim Terap; Lot # 65; Area: 46.1491 ha - Land title # 1116; District: Bandar Baharu; Sub-district: Mukim Serdang; Lot # 929; Area: 2.896 ha <p>However, information on actual legal use of the land available in some legal ownership documents (land titles) of land in Somme Estate could be updated further. Hence, an OFI has been raised on the matter.</p> <p>Jentayu Estate total land titles: 5 as per samples sighted as following:</p> <ul style="list-style-type: none"> - Land title # 5963; District: Kuala Muda; Sub-district: Mukim Teloi Kiri; Lot # 3273; Area: 119.7 ha - Land title # 1973; District: Kuala Muda; Sub-district: Mukim Gurun; Lot # 5580; Area: 50.06221 ha - Land title # 5964; District: Kuala Muda; Sub-district: Mukim Teloi Kiri; Lot # 3274; Area: 291.8 ha <p>Bukit Hijau total land titles: 35 as per samples sighted as following:</p> <ul style="list-style-type: none"> - Land title # 3903; District: Baling; Sub-district: Mukim Tawar; Lot # 376; Area: 6.4769 ha - Land title # 2189; District: Baling; Sub-district: Mukim Tawar; Lot # 377; Area: 6.2169 ha - Land title # 1855; District: Baling; Sub-district: Mukim Tawar; Lot # 2360; Area: 13.2282 ha 	
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4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	No issues of land dispute issue occurs in all estates within SOU 1 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	No issues of land dispute issue occurs in all estates within SOU 1 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	No issues of land dispute issue occurs in all estates within SOU 1 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	No issues of land dispute issue occurs in all estates within SOU 1 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory	Boundary maps available for all estates within SOU 1 clearly demarcating estate area with location and coordinate of boundary stone and pegs as per sample boundary checked at Somme estate field number P13B	Complied

	<p>mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>bordering with smallholder (GPS coordinate 100° 37' 57" E; 5° 13' 38" N) found to be visibly maintained. Another sample boundary at field number P97B bordering with Kampung Badlishah (GPS coordinate 100° 36' 16" E; 5° 16' 43" N) also visibly maintained.</p> <p>There is no land dispute recorded since last audit. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</p>	
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 of land dispute issue occur in all estates within SOU 1 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p> <p>In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</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 of land dispute issue occurs in all estates within SOU 1 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p> <p>In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</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 of land dispute issue occurs in all estates within SOU 1 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p> <p>In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</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>			

<p>4.5.1</p>	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -</p>	<p>Neither any customary and other user rights nor new planting in all estates within SOU 1. Documents showing legal ownership available as per sighted as following: Somme Estate total land titles: 115 as per samples sighted as following: - Land title # 1127; District: Bandar Baharu; Sub-district: Mukim Serdang; Lot # 976; Area: 3.0857 ha - Land title # 32705; District: Kulim; Sub-district: Mukim Terap; Lot # 65; Area: 46.1491 ha - Land title # 1116; District: Bandar Baharu; Sub-district: Mukim Serdang; Lot # 929; Area: 2.896 ha Jentayu Estate total land titles: 5 as per samples sighted as following: - Land title # 5963; District: Kuala Muda; Sub-district: Mukim Teloi Kiri; Lot # 3273; Area: 119.7 ha - Land title # 1973; District: Kuala Muda; Sub-district: Mukim Gurun; Lot # 5580; Area: 50.06221 ha - Land title # 5964; District: Kuala Muda; Sub-district: Mukim Teloi Kiri; Lot # 3274; Area: 291.8 ha Bukit Hijau total land titles: 35 as per samples sighted as following: - Land title # 3903; District: Baling; Sub-district: Mukim Tawar; Lot # 376; Area: 6.4769 ha - Land title # 2189; District: Baling; Sub-district: Mukim Tawar; Lot # 377; Area: 6.2169 ha - Land title # 1855; District: Baling; Sub-district: Mukim Tawar; Lot # 2360; Area: 13.2282 ha</p>	<p>Complied</p>
<p>4.5.2</p>	<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</p>	<p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 1. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal,</p>	<p>Complied</p>

	<p>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>customary and user rights. Land titles and ownerships of the lands were available.</p>	
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 1. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 1. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 1. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	Complied
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the</p>	<p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 1. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal,</p>	Complied

	operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	customary and user rights. Land titles and ownerships of the lands were available.	
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 -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 1. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 1. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 1. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.6.2	(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 -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 1. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied

4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 1. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 1. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Complied

	- Minor compliance -	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	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).	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Complied

	- Minor compliance -	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	
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 were available as per MPOB Daily FFB Reference Price Summary by Region (RM/Tonne); April 2022; Northern Region; 1% MPOB FFB Price. The daily price was displayed at the weighbridge to facilitate the suppliers to sight and witness. There were no smallholders supplying to Sungai Dingin POM except for out growers and traders among others as listed follows; Alma Produce / Boleh Jadi / CK Teik Enterprise / FELCRA Bhd / Genting Plantations Bhd - Bkt Sembilan Estate / GSR KRISS / KO FELCRA Malau /KPSM Selama/Tang Tatt / Tentu Mewah.	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). - Critical (Major) compliance -	FFB Pricing explanation made normally through meeting with FFB suppliers of Sungai Dingin Palm Oil Mill. Verified the latest meeting with FFB Suppliers conducted on 14/04/2021. There were no smallholders supplying to Sungai Dingin POM except for out growers and traders among others as listed follows; Alma Produce / Boleh Jadi / CK Teik Enterprise / FELCRA Bhd / Genting Plantations Bhd - Bkt Sembilan Estate / GSR KRISS / KO FELCRA Malau /KPSM Selama/Tang Tatt / Tentu Mewah	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Fair pricing calculated based on 1% MPOB FFB Price, awarded to suppliers as specified in individual agreements of FFB suppliers with the SDPB in clause; <i>"Daily reference price summary by region (mill gate) (RM/1%OER) based on 6 regional groups"</i> .	Complied

		There were no smallholders supplying to Sungai Dingin POM except for out growers and traders among others as listed follows; Alma Produce / Boleh Jadi / CK Teik Enterprise / FELCRA Bhd / Genting Plantattions Bhd - Bkt Sembilan Estate / GSR KRISS / KO FELCRA Malau /KPSM Selama/Tang Tatt / Tentu Mewah																										
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 were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable																									
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Contracts for FFB out growers and traders are fair, legal and transparent and have an agreed time frame as per sample sighted as following: <table border="1" data-bbox="1086 901 1832 1082"> <thead> <tr> <th></th> <th></th> <th>GSR KRISS Enterprise</th> <th>ICAN Trading</th> <th>GPB - Bkt Sembilan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Company No</td> <td>PG0489667-T</td> <td>904067-V</td> <td>197701003946</td> </tr> <tr> <td>2</td> <td>Agreement no</td> <td>FFB03337L</td> <td>FFB03331L</td> <td>FFB03330L</td> </tr> <tr> <td>3</td> <td>Effective date</td> <td>01/1/22</td> <td>01/01/22</td> <td>01/01/22</td> </tr> <tr> <td>4</td> <td>Completion date</td> <td>31/12/22</td> <td>31/12/22</td> <td>31/12/22</td> </tr> </tbody> </table>			GSR KRISS Enterprise	ICAN Trading	GPB - Bkt Sembilan	1	Company No	PG0489667-T	904067-V	197701003946	2	Agreement no	FFB03337L	FFB03331L	FFB03330L	3	Effective date	01/1/22	01/01/22	01/01/22	4	Completion date	31/12/22	31/12/22	31/12/22	Complied
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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 -	Payments are made within 30 days, upon receipt of supplier's invoice and confirmation of the quantity of FFB delivered to the mill. Payment was made through the financial department at head office to the FFB Suppliers account.	Complied																									
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	The Mill conducts regular calibration on their weighbridges used to determine the FFB tonnage for all FFB suppliers. There are 2 weighbridges used in the mill and records of yearly calibration for both weighbridges were available for verification as below:	Complied																									

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		Details	W/bridge 1	W/bridge 2	
		1 Capacity	60,000 Kg	60000 kg	
		2 Serial Number	B602991422	B 5229896603	
		3 Certificate Number	D 011375	D011374	
		4 Safety Label Number	DE3001100	DE3001099	
		5 Calibration date	24/06/21	24/06/21	
		Calibrator: DE Metrology Sdn Bhd			
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>Sime Darby Plantation as a Group has developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As of current, no scheme smallholders program managed by Sime Darby Sungai Dingin POM. Information of Sime Darby Plantation RSG programs available via website link http://www.simedarbyplantation.com/sustainability/programmes/supply-chain-sustainability/working-suppliers.</p>			Complied
5.1.9	<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. In case of any SDPOM handled the process as per Standard Operation Manual; Date: 01/11/2008 that documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2) for grievance handling.</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>					

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<p>5.2.1</p>	<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>Sg Dingin Palm Oil Mill received no FFB from the scheme smallholders. However, consultation are made normally through meeting e.g. Meeting with stakeholders and FFB suppliers incorporated in the stakeholder meeting. Smallholders as local community were invited to attend the stakeholder meeting for briefing on matters related to MSPO and RSPO certifications particularly on crop quality and field standards.</p> <table border="1" data-bbox="1126 595 1917 746"> <thead> <tr> <th></th> <th>OU</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Somme Estate</td> <td>27/04/22</td> <td>16/02/21</td> </tr> <tr> <td>2</td> <td>Jentayu Estate</td> <td>05/04/22</td> <td>11/03/21</td> </tr> <tr> <td>3</td> <td>Bkt Hijau Estate</td> <td>23/05/22</td> <td>09/04/21</td> </tr> <tr> <td>4</td> <td>Sg Dingin POM</td> <td>18/05/22</td> <td>07/04/21</td> </tr> </tbody> </table>		OU	Date	Date	1	Somme Estate	27/04/22	16/02/21	2	Jentayu Estate	05/04/22	11/03/21	3	Bkt Hijau Estate	23/05/22	09/04/21	4	Sg Dingin POM	18/05/22	07/04/21	<p>Complied</p>
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<p>5.2.2</p>	<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>There were no smallholders crop received or processed by the mill hence criteria 5.2 is not applicable. However consultation are made normally through meeting e.g. Meeting with stakeholders and FFB suppliers incorporated in the stakeholder meeting. Smallholders as local community were invited to attend the stakeholder meeting for briefing on matters related to MSPO and RSPO certifications particularly on crop quality and field standards.</p> <table border="1" data-bbox="1108 1078 1910 1230"> <thead> <tr> <th></th> <th>OU</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Somme Estate</td> <td>27/04/22</td> <td>16/02/21</td> </tr> <tr> <td>2</td> <td>Jentayu Estate</td> <td>05/04/22</td> <td>11/03/21</td> </tr> <tr> <td>3</td> <td>Bkt Hijau Estate</td> <td>23/05/22</td> <td>09/04/21</td> </tr> <tr> <td>4</td> <td>Sg Dingin POM</td> <td>18/05/22</td> <td>07/04/21</td> </tr> </tbody> </table>		OU	Date	Date	1	Somme Estate	27/04/22	16/02/21	2	Jentayu Estate	05/04/22	11/03/21	3	Bkt Hijau Estate	23/05/22	09/04/21	4	Sg Dingin POM	18/05/22	07/04/21	<p>Complied</p>
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<p>5.2.3</p>	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p>	<p>Sime Darby Plantation as a Group has developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible</p>	<p>Complied</p>																				

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	- Minor compliance -	<p>sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.</p> <p>The mill did not receive FFB from the scheme smallholders. Therefore, this indicator is not applicable.</p>	
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad as a group has developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As of current, no scheme smallholders program managed by Sungai Dingin POM. Information of Sime Darby Plantation RSG programs available via official website. The mill received no crop from smallholders. The outside crop suppliers being invited in the stakeholder's meetings and briefing as well as training are made in these sessions. Details as per minutes of meeting with the stakeholders.</p>	Complied
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation as a group has developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the FFB and CPO are sourced from identified, legal and responsible sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As of current, no group smallholders' program is managed by Sungai Dingin POM. Information of Sime Darby Plantation RSG programs are available via SDP website.</p>	Complied

Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 1 has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 2nd December 2019. The policy shall be guided by the commitments spelt out in the Company's in Human Rights Charter (HRC) where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.</p>	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>Records of employments and interview conducted on-site with sampled internal and external stakeholders confirmed that the workers and groups including local communities, women, and migrant workers have not been discriminated against.</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>No discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. This was confirmed from job vacancy advertisement and sample recruitment sighted.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Pregnancy testing was conducted only for women employee involved in chemical handling work to ensure no pregnant women working with the risk of chemical exposure. All women employees involved in chemical handling work within SOU 1 underwent Urine Pregnancy Test (UPT) conducted by respective estate's Hospital Assistant upon request only.</p>	Complied

<p>6.1.5</p>	<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. - Critical (Major) compliance -</p>	<p>The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly and through Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability & Quality Management (PSQM) Department. It explained the types of gender-based violence & grievance procedures. Meetings were conducted quarterly according to the handbook. Gender Committee were established by the mill and estates management.</p>	<p>Complied</p>
<p>6.1.6</p>	<p>There is evidence of equal pay for the same work scope. - Minor compliance -</p>	<p>No discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting.</p> <p>Sighted the job description of each workers mention the same regardless of skin colour, religion, race and caste. Evidence of equal pay sighted based on passports & work permit, work agreement, payslip, attendance & checkroll and Socso 8A form of June 2021, October 2021 & January 2022 for sample female and male employees as following:</p> <p>Evidence available as per sample as following: Sungai Dingin POM:</p> <ul style="list-style-type: none"> - Employee ID # 26831; F; Date joined: 16/12/2005 - Employee ID # 50752; F; Date joined: 25/6/2010 - Employee ID # 117585; F; Date joined: 1/10/2015 - Employee ID # 136477; M; Date joined: 4/9/2017 - Employee ID # 151731; M; Date joined: 21/6/2019 - Employee ID # 161145; M; Date joined: 4/12/2020 - Employee ID # 161528; M; Date joined: 17/9/2019 	<p>Complied</p>

		<ul style="list-style-type: none"> - Employee ID # 167192; F; Date joined: 17/1/2022 - Employee ID # 168842; M; Date joined: 25/4/2022 - Employee ID # 168963; M; Date joined: 9/5/2022 <p>Somme Estate:</p> <ul style="list-style-type: none"> - Employee ID # 27458; F; Date joined: 11/4/2009 - Employee ID # 27571; F; Date joined: 15/6/2009 - Employee ID # 143418; F; Date joined: 18/6/2018 - Employee ID # 162697; F; Date joined: 17/9/2019 - Employee ID # 90495; M; Date joined: 3/5/2013 - Employee ID # 147850; M; Date joined: 17/1/2019 - Employee ID # 151699; M; Date joined: 20/6/2019 - Employee ID # 162372; M; Date joined: 9/12/2016 - Employee ID # 156066; M; Date joined: 1/11/2019 - Employee ID # 152515; M; Date joined: 16/7/2019 <p>Bukit Hijau Estate:</p> <ul style="list-style-type: none"> - Employee ID # 74498; F; Date joined: 1/11/2011 - Employee ID # 90584; M; Date joined: 11/5/2013 - Employee ID # 115995; F; Date joined: 2/8/2015 - Employee ID # 123721; M; Date joined: 1/8/2016 - Employee ID # 149796; F; Date joined: 1/4/2019 - Employee ID # 120210; M; Date joined: 10/3/2016 - Employee ID # 122000; M; Date joined: 2/6/2016 - Employee ID # 154118; M; Date joined: 2/9/2019 - Employee ID # 157713; M; Date joined: 27/1/2020 	
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		<ul style="list-style-type: none"> - Employee ID # 155116; M; Date joined: 2/9/2019 <p>Jentayu Estate:</p> <ul style="list-style-type: none"> - Employee ID # 26287; F; Date joined: 1/7/2001 - Employee ID # 26289; F; Date joined: 1/9/1999 - Employee ID # 54134; F; Date joined: 20/8/2010 - Employee ID # 83493; M; Date joined: 25/9/2012 - Employee ID # 91615; M; Date joined: 19/6/2013 - Employee ID # 100010; M; Date joined: 7/3/2014 - Employee ID # 116744; M; Date joined: 7/9/2015 - Employee ID # 131952; M; Date joined: 21/3/2017 - Employee ID # 133716; M; Date joined: 23/5/2017 - Employee ID # 152095; M; Date joined: 1/7/2019 - Employee ID # 159021; M; Date joined: 13/7/2020 	
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>All the workers are under direct employment and some electrical works are under contractor workers. The pay slip has included basic income, allowance pay, working days, medical leave, deduction of salary and etc. as per employment contract in compliance with requirements of available collective agreement i.e. MAPA Circular # 4/2022; Proposed New Agreement to Replace The MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2019; Date: 11/1/2022</p> <p>Agreement referring to the MAPA Circular # 18/2022; Minimum Wages Order 2022 (MWO 2022) Frequently Asked Questions (FAQS); Date: 10/5/2022 stated that through MAPA Circular # 16/2022 dated 29/4/2022. All foreign workers are provided with employment contract agreement</p>	Complied

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		<p>written in the language appropriate to them such as Bangladeshi, Hindi and Indonesian to name a few.</p> <p>Additionally, there's Labour Department legal permit for Sungai Dingin POM as following:</p> <ul style="list-style-type: none"> - Permit for 130 hours limit of overtime; Ref. # BHG.PU/9/134 JLD 9(11); Date: 27/3/2017 <p>Permit of exceptions from Prohibition of Night Work for Women Employee; Ref. # BHG.PU/9/135 JLD 14(18); Date: 2/8/2018</p>	
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>As per Inter-Office Mail from Sime Darby Plantation's Head, HR Upstream to Senior Managers/Managers Estate & Mill for all Northern Region, Central East Region, Central West Region on Implementation of Revised Workers' Contracts and Register of Maternity Leave and Allowances; Date: 3/12/2019.</p> <p>All workers work agreement were also based on MAPA Circular No. 1/2020; Date: 14/1/2020; Minimum Wages Order 2020 (MWO 2020) where the order provides for the minimum wages rates payable to an employee who works in a place of employment in any City Council or Municipal Council area as specified in the schedule.</p>	Complied
6.2.3	<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>Records of payslip and check-roll documents available to the workers for sample employees sighted as per indicator 6.1.6 above.</p> <p>Records shown all relevant legal compliance requirements were met by SOU 1 as per monitoring records by management i.e. Checklist for wages (WS6).</p>	Complied
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units,</p>	<p>The mill and estates within SOU 1 established the Employee Welfare Committee (EWC) as a team to represent and conduct the housing inspection based on area assigned to designated representative. There's also Person In-charge of Accommodation (PIOA) appointed among estate's Hospital Assistant. Sighted sample housing and facilities inspections conducted as following:</p>	Complied

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	<p>a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<ul style="list-style-type: none"> - Somme Estate latest VMO visit dated on 17/5/2022 by Dr. Ahmad Hisham Zakaria - Housing weekly inspection latest 23/5/2022; Meeting EWC latest 7/4/2022 - Sungai Dingin POM VMO visit latest 25/2/2022 by Dr. Chong From Klinik Chong Kulim - Sungai Dingin POM Housing Inspection PIOA latest 21/5/2022 - Bukit Hijau Estate latest VMO visit dated 13/5/2022 by Dr. Halimah Saad 	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>The mill and estates within SOU 1 ensured affordable food for its employee through canteen food price monitoring as part of terms in the Mill Canteen Tenancy/Rental Agreement for sundry shop operators as per sample Jentayu Estate grocery shop price monitoring by Kedai Runcit Jentayu Tom Binti Awang.</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</p>	<p>SOU 1 conducted the Prevailing Wage Assessment and calculated individual local and foreign workers current salary including non-monetary benefit given average mill and estate Local Workers RM: 1,559.25; Foreign Workers: RM1,836.52. Prevailing Wage Assessment conducted by Group Sustainability & Quality Manager (GSQM) Sime Darby Plantation. The difference mainly due to additional welfare and arrival token spent on foreign workers.</p>	Complied

	<p>will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the	Employment contracts detailing payments and conditions of employment available to the permanent workers employed as per samples sighted in	Complied

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	<p>unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>indicator 6.2.2 above. No casual, temporary and day labour employed within all operating units within SOU 1.</p>	
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
<p>6.3.1</p>	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> - Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. - Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. - Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively and the workers have their freedom to join the NUPW/MAPA union. 	<p>Complied</p>
<p>6.3.2</p>	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>The mill and estates within SOU 1 established the Employee Welfare Committee as operating unit level collective bargaining medium. Sighted the records of latest NUPW meeting for Somme Estate latest NUPW Committee Meeting with Estate Management; Date: 3/2/2022 & Invitation by NUPW Kedah, Perlis and Penang branch for meeting to be conducted on 17/5/2022 at Somme Estate as per letter ref. # NUPW/KD/E35/05/22 Sungai Dingin Minit Mesyuarat Bersama Jawatankuasa NUPW KKS Sungai Dingin; Date: 1/3/2022</p>	<p>Complied</p>

		Minit Mesyuarat Jawatankuasa NUPW Bersama Majikan Ladang Bukit Hijau; Date: 21/3/2022	
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	Interview with workers union representatives (NUPW Chairman & NUPW Secretary) confirmed that they were independently elected as the NUPW by all members of NUPW among mill and estate workers via an election without interference by the management.	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below: We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to: - Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. - Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. - Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations. - Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the wellbeing of our communities. - Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognise that the local communities have the right to give or withhold their	Complied

		<p>consent to proposed projects that may affect the lands they own, occupy or otherwise use.</p> <ul style="list-style-type: none"> - Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees. - Protecting the Rights of Children: We seek to promote the wellbeing of children and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography. <p>Verification of workers master list confirmed that there is no child labour hired.</p> <p>For contractors, the abolishment of child labour & protecting the rights of children available in the Vendor COBC clause 5.8, Human Rights Charter-protecting the rights of children.</p>	
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liaison & Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the interview and employees master lists data, no young person below 18 years old employed within all operating units within SOU 1.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>Interview conducted on-site with sampled internal and external stakeholders confirmed that the information on no child labour policy and the negative effects of child labour were provided in appropriate languages and accessible to them.</p>	Complied

		<p>Records of communication sighted available for communication with vendors as per sample Vendor Integrity Pledge (VIP) and Vendor Code of Business Conduct (COBC); August 2020 as following:</p> <p>Somme Estate VIP COBC:</p> <ul style="list-style-type: none"> - Em Impian Serasi Enterprise - AMZ Gemilang Enterprise - Mayang Byumas Sdn. Bhd. 	
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> - Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims. - Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation. <p>The policy was communicated through the Gender Committee meeting conducted quarterly.</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 1 has implemented Social Policy, Gender Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy was displayed on the notice board which was accessible by the workers. Briefing of the policies was</p>	Complied

		conducted during morning muster and the policies was displayed at the notice board outside the office.	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -	New mothers assessments were discussed during SOU 1 level Gender Committee Meeting latest dated 3/3/2022; previous meeting on 7/12/2021 & 7/9/2021. There are 2 new mothers identified by Sungai Dingin POM that conducted New Mothers assessment on 18/4/2022 and on 12/2/2022. For both mothers, there's no specific needs required by them as both babies were taken care by family members outside of mill housing area. Sungai Dingin POM Gender committee meeting latest 19/5/2022. Bukit Hijau Gender Committee meeting latest 4/3/2022.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	Interview conducted on-site with sampled internal stakeholders among all workforce confirmed that the information on grievance mechanism, which respects anonymity and protects complainants where requested, is established and communicated to them. No grievance issues that requires the implementation of the mechanism occurs in all operating units within SOU 1 since the last audit.	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	(C) All workers have entered into employment voluntarily and the following are prohibited: <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 	The recruitment cost were declared by the labour agent from source country for the applicable fees. Sampled for Tenaga Kerja Indonesia (TKI) Kepada Agensi (PL) Dan Sponsor (PL) for Indonesia effective date on 01/06/2017 (IDR 6,150,000) and Amoza Travels for India (INR 50000) for documents required, medical, insurance, transportation, etc. No other hidden recruitment fees paid to agent. Passport was kept by the management voluntarily. There is agreement letter signed by worker and employer on the safekeeping passport at office. If the workers want to obtain the passport for own usage, they can anytime request for it.	Complied

	<ul style="list-style-type: none"> • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>There is no contract substitution as the employment contract signed between Sime Darby and embassy of Indonesia and India was same with the employment contract signed between worker and estate/mill.</p> <p>Overtime was given voluntarily. Sighted the overtime request form where employer offer work to worker after working hour/rest day/public holiday.</p> <p>The termination of service clearly stated that the termination of employment if:</p> <ol style="list-style-type: none"> 1. The company is not satisfied with your performance 2. You end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term. 3. You commit any misconduct, including theft, fraud, insubordination, negligence or any other form of crime. 4. You have breached any express or implied terms of your employment. 5. Fail medical examination based on FOMEMA result. 6. Involved in any act that will affect the reputation of the company. <p>No penalty, debt bondage and withholding of wages been imposed to worker if they want to resign. This has been confirmed through the interview and employment contract signed.</p>	
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>SOU 1 has implemented a Sime Darby’s Human Rights Charter on where they committed as below:</p> <ol style="list-style-type: none"> a. Providing equal opportunity b. Respecting freedom of association c. Eradicating any form of exploitation d. Ensuring favourable working conditions e. Enhancing Safety and Health 	Complied

		They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights. For e.g.: All the workers have provided with induction training in Sua Betong Estate or based estate during their arrival to Malaysia.	
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>Both the estates and mill management conduct regular two-way communication with their employees through the quarterly OSH committee meeting. Among the agenda discussed are:</p> <ul style="list-style-type: none"> - Confirmation of minutes previous meeting - Workplace inspection report - Accident report - Medical surveillance & Audio metric - Status of Safety Program & Environmental - First Aid Kit & Fire Extinguishers Report - HIRARC - Complaint from Employee/External Party - Other matters <p>Workplace inspections are made prior to the ESH meeting. The respective Managers were appointed as ESH Chairman (PIC) through letter signed by Regional General Manager. All letters were made available for verification.</p>	Complied
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</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>The CU displayed the accident and emergency procedure at strategic places such as muster ground and labour quarters. Additionally, the</p>	Complied

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	<p>other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>management communicate the procedure during morning briefing and training.</p> <p>The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures/guidelines were issued by RSQM and amended suit to the situation in the estates and mill.</p> <p>ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trained personnel for First Aid were among the employees working as field staff/mandores. The first aid boxes were also available at various workplace such as estate office, workshop, and store. The estates distributed the first aid box to the mandores and brought along to the field during operations.</p>	
<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The management provides appropriate PPE to the employees in accordance with HIRARC and Standard Operating Procedure. PPE issuance records were well maintained and made available for verification. Among the information available in the record was name of employee, type of PPE (i.e., apron, safety shoes, rubber boots, N95 mask, respirator, cartridge, helmet, goggle, cotton gloves, nitrile gloves, etc.), date of PPE received and receipt acknowledgement by the recipient. On site verification and interview with workers showed that the appropriate PPE was provided for free and worn accordingly.</p> <p>Sanitation facilities such as shower room, PPE washing area, personal clothing locker for those applying pesticides are available, so that workers can change out of PPE, wash, and put on their personal clothing were provided and well maintained.</p>	<p>Complied</p>
<p>6.7.4</p>	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p>	<p>Should there be any medical care needed by the employees, clinics with certified Medical or Hospital Assistants in-charge were provided at all the sampled management units. Based on site visits, all the clinics were well</p>	<p>Complied</p>

	- Minor compliance -	maintained and managed. Records of medical inventory, VMO visits, and patients treated were made available for verification. The sampled estates and mill are subscribing to SOCSO to cover the accident insurance for all their workers. Payment vouchers to SOCSO were made available for verification by all the operating units.	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost man day MC.) This is summarized officially in the JKPP 8. Records are kept for a minimum 10 years in the office. Crosschecking with RSPO metrics template showed that the data was appropriately recorded.	Complied
Principle 7: Protect, conserve and enhance ecosystems and the environment			
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	The estates continued to monitor the Implementation of Integrated Pest Management (IPM) plans. <ul style="list-style-type: none"> a) The estate had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. The plan was guided by SOP dated Dec 2016 index no 17.10 beneficial plant protocol. b) In order to minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as <i>Turnera subulata</i>, <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>, along the roadsides and designated points in the fields and also within the nursery perimeter. c) The plan also advocated single layer EFB mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and diseases had been continued. These monthly detection and observations 	Complied

		<p>were carried by staff.</p> <p>d) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year where recommended by the PA /Agronomist. Baiting are continued until bait acceptance threshold level.</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>This is not practiced in the estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM. The estates have declared this compliance in the status of IPM species invasiveness.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There was no land preparation in SOU 01 Mill and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <p>a) EQMS-SOP-SectionB2 - Under felling/clearing & land preparation 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, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The justification of all pesticides used in the estate were documented in Sime Darby Agriculture Reference Manual (ARM), Section 15 Plant Protection [Issue No. 1, Version 3, dated 01/07/2011] and Section 16 Weed Control [Issue No. 1, Version 3, dated 01/07/2011].</p>	Complied
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the sampled estates in a document entitled "Monitoring of Chemical (Pesticide & Herbicide) Usage per Hectare and per FFB Production. It has the information about chemical names,</p>	Complied

		active ingredients & their concentration (%), LD50, months, quantity used, and hectare applied.	
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Agriculture Reference Manual (ARM), Section 15 Plant Protection [Issue No. 1, Version 3, dated 01/07/2011] and Section 16 Weed Control [Issue No. 1, Version 3, dated 01/07/2011].</p> <p>The implementation in the field is consistent with the SOP established. Among the IPM plans implemented by the estates were establishment of beneficial plants (e.g. antigonan, tunera and cassia) and barn owl (Tyto alba).</p>	Complied
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>	There was no evidence that prophylactic pesticide was used by the sampled estates.	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ol style="list-style-type: none"> Judgment of the threat and verify why this is a major threat Why there is no other alternative which can be used Which process was applied to verify why there is no other less hazardous alternative What is the process to limit the negative impacts of the application Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. 	Based on the chemical registers for all the sampled estates, the pesticides used are mostly of Class III and IV. Paraquat and monocrotophos were no longer in use. Much safer chemical such as glyphosate and acephate were used as alternative. This is further verified through chemical store visits.	Complied

	- Minor compliance -		
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>Trainings on safe handling of chemical and right method of spraying were given to the relevant employees which include the storekeeper, pre-mixers, and herbicides sprayers. This is also in-line with the recommendation by the CHRA assessor. Various methods of training such as briefing, practical training and on-the-job supervisions were used to ensure effective delivery of knowledge. Records of training were well maintained for verification.</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>The pesticides were kept in the designated stores at all the sampled estates in accordance to the regulations. The stores were equipped with locks, ventilation and accessibility was limited to authorized personnel only. Appropriate hazard signage was also put up to create safety caution.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>All pesticide containers are triple rinsed and punctured before being disposed to the authorised collector. Receipts of disposal were made available for verification. Some of the 20 lt containers were re-used to contain pre-mixed herbicides for spraying operation in the field. There was no evidence of pesticide containers are used for other purpose.</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>Aerial spraying is not a practice in the certification unit.</p>	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Although specific annual medical surveillance by OHD for pesticide operators is not required or recommended by the CHRA assessor, the estates have made their own efforts to carry out medical check-up by the</p>	Complied

		Medical Assistant on monthly basis as an alternative. Based on the results of the medical check-ups, there was no workers found to be unfit for work.													
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>	There is no evidence that work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions at all the sampled estates.	Complied												
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>															
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>SOU 01 Sg Dingin Mill and all the 3 estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2022 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1064 885 1915 1220"> <thead> <tr> <th></th> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>Land</td> <td>Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.</td> </tr> </tbody> </table> <p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2022. The waste generated from the mill/estates operations as shown below:</p>		Receptor	Sources	1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG	2	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	Land	Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.	Complied
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7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>In Sg Dingin POM and the estates in SOU 01, procedure SD/SDP/PSQM (ESH)/203-EN1 – Scheduled Wastes (Hazardous Waste) Management has been established.</p> <ul style="list-style-type: none"> a) Management and disposal of waste water 2022 has been established compiled by Assistant Engineer/Assistants/Staff. b) Waste Management Plan 2022 has been established prepared by QA and verified by the Assistant Engineer/Assistants/Staff. c) Waste Management Plan 2022 has been established in Jan 2022. d) Based on Environmental Impact Evaluation (file no: SM/5.2/EIE) and Environment Aspect and Impact Identification (file no: SM/5.2/EAI) improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination. e) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner. 	Complied																											

f) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The CU scheduled waste is disposed to the following vendors registered with DOE. Used lubricants oil and used batteries were collected by SDI upon completion of every vehicles/engines servicing. DOE has made approval to authorize SDI via letter dated 06/9/2011. DOE letter of authority was sighted and verified. Flora Sentosa Sdn Bhd had appointment from Kualiti Alam via letter dated 16/3/2015

Estate	Date	SW 409	SW 410	SW 305	SW 404
Somme	11/03/22	-	0.003	0.036	-
Somme	15/01/22	-	0.003	0.036	-
Somme	20/02/22	-	-	-	0.011
Somme	19/08/21	-	-	-	0.0026
Bkt Hijau	28/4/22	-	-	-	0.0004
Bkt Hijau	21/2/22	-	-	0.800	-
Bkt Hijau	24/11/21	-	-	-	0.0002
Jentayu	26/2/21	-	0.003	0.023	-
Jentayu	15/02/22	-	-	-	0.006
Jentayu	19/8/21	-	-	-	0.001
		SW	SW	SW	SW

**RSPO P&C Public Summary Report
Revision 13 (Apr 2022)**

		409	410	306	322
SDPOM	18/4/22	0.096	0.450	1.700	0.0750
		SW 305	SW 409	SW 410	SW 322
SDPOM	02/10/21	0.700	1.300	0.130	0.0500

The CU scheduled waste is disposed to the following vendors registered with DOE.

Estate	Date	SW Buyers/Vendor
Bkt Hijau	30/4/21	Pentas Flora Sdn Bhd
Jentayu	30/4/21	Sime Darby Industrial
Somme	30/4/20	Sime Darby Industrial
SDPOM	30/4/21	Pentas Flora Sdn Bhd
SW 404	30/4/21	Flora Sentosa Sdn Bhd

Empty containers were despatched to licensed buyer M/s Premanad Subrmaniam as per communication email by DOE, Kulim branch dated 5/1/2019. Records of despatches sighted as follows. Bukit Hijau recycled most of the containers for the field spraying mainly at the rubber fields.

	Estate	Date	20L container	18L Container	500g Container
1	Somme	16/12/21	164 units	20 units	50 units
2	Jentayu	17/04/19	104 units	-	-

		<table border="1" data-bbox="1108 363 1881 411"> <tr> <td>3</td> <td>Bkt Hijau</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> </table> <p>Domestic waste for the operating units in SOU 01 was disposed as follows;</p> <table border="1" data-bbox="1108 518 1881 798"> <thead> <tr> <th colspan="3">Disposal site</th> <th>Remarks</th> </tr> <tr> <th>Estate</th> <th>Estate</th> <th>External</th> <th></th> </tr> </thead> <tbody> <tr> <td>Somme</td> <td>P97A</td> <td>-</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>Jentayu</td> <td>P15A</td> <td>-</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>Bkt Hijau</td> <td>P03B</td> <td>-</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>SDPOM</td> <td>-</td> <td>MDK</td> <td>Collection by SDE</td> </tr> </tbody> </table> <p>Evidences of collection for SDPOM were verified through the payment made to the Majlis Daerah Kulim - Panimax Construction via despatch no P0092718 dated 26/03/22.</p>	3	Bkt Hijau	-	-	-	-	Disposal site			Remarks	Estate	Estate	External		Somme	P97A	-	Collection 2/3 x week	Jentayu	P15A	-	Collection 2/3 x week	Bkt Hijau	P03B	-	Collection 2/3 x week	SDPOM	-	MDK	Collection by SDE	
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7.3.3	<p>The unit of certification does not use open fire for waste disposal. - Minor compliance -</p>	<p>There was no land preparation in SOU 01 Mill and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> a) EQMS SOP Section-B2 under felling/clearing & land preparation b) Carbon Policy <p>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, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate. No fire was used for waste disposal.</p>	Complied																														
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>																																	

7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	ARM Section 8 covers the procedure for fertilizer application for both immature and mature. The procedure gives the guideline type of fertilizers to be used, timing to apply, dosage and placement.	Complied								
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	Periodic foliar sampling analysis was last conducted in 2020 for the sampled estates to monitor the changes in nutrient status. The results of the analysis were used by the agronomist for their recommendation for fertilisers applications programme. The soil analysis is done once in 5 years. Analysis reports were made available for verification.	Complied								
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	EFB application is done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from Sungai Dingin POM. The best practice of EFB application is described in the ARM. Records were available for verification. Based on the records, it was noted that the EFB application rate per hectare was around 40 mt/Ha.	Complied								
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Records of fertiliser input were well maintained in various documents such as store issuance record, bin cards and month end account to name a few. Among the information available in the records was type of fertiliser, quantity and field number applied including date of application. Based on sampled fields, the amount of fertiliser issued out (i.e., applied) from the store according to SAP software system was tally with the recommendations by agronomist, for all the sampled estates.	Complied								
Criterion 7.5: Practices minimise and control erosion and degradation of soils.											
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available. The soil series in the estates were classified as follows: <table border="1" data-bbox="1064 1276 1809 1372"> <thead> <tr> <th></th> <th>Jentayu</th> <th>Somme</th> <th>Bukit Hijau</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tebok</td> <td>Alluvium</td> <td>Batu Lapan</td> </tr> </tbody> </table>		Jentayu	Somme	Bukit Hijau	1	Tebok	Alluvium	Batu Lapan	Complied
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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>Like all SDPB Estates, the estates visited in SOU 01 continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ul style="list-style-type: none"> a) Slope & River Protection Policy b) Buffer Zone & 25-degree slope and in item 8 Section 4 c) Land Preparation for Terracing in ARM Manual. <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in some mature areas. The cover crop <i>mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>neprolepis biserrata</i> in the inter rows were sighted during the visit. The slope maps for the titled ha were provided by the R&D Precision Agriculture Unit with details as follows:</p>	Complied																												

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7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	This compliance being addressed in the " <i>Slope and River Protection</i> " signed by the CEO dated Jan 2015 stating the following among others; "Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly".	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 -	There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.	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 -	There is no peat soil or soil categorized as marginal or fragile soil at all estates visited. Addressed in the Sime Darby Plantation Group Sustainability and Quality Policy Statement signed by the Group Managing	Complied																																								

		<p>Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2:</p> <p>a) Protect and enhance forest: "We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:</p> <p>i. No new development of peat areas, regardless of depth or location.</p> <p>ii. We will seek to rehabilitate existing plantings on peat where possible.</p>	
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>Soil surveys are done and available in a soil map at all estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates.</p>	Complied
<p>Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil all estates visited. The auditor vverified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	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>	<p>There is no peat soil or soil categorized as marginal or fragile soil all estates visited. The auditor vverified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Not Applicable
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil all estates visited. The auditor vverified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Not Applicable

7.7.4	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil all estates visited. The auditor vverified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	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. This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition. - Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.</p>	Not Applicable
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.</p>	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.</p>	Not Applicable

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<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 01 Mill /estates had established its Water Management Plan 2022 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <ul style="list-style-type: none"> a) Implementation of rainwater harvest, b) Construction of water gate and scheduled water pumping for effective management of field drains and field water level. c) daily monitoring of bund / scheduled maintenance d) Establishment of <i>mucuna bracteata</i> to prevent erosion, e) Side drain at field road to control water, frond stacking, f) Enhancement of ground vegetation at bare ground area. <p>The water sources are as shown below:</p> <table border="1" data-bbox="1061 991 1899 1394"> <thead> <tr> <th></th> <th>Water source</th> <th>Usage</th> <th>Monitoring & measurement</th> <th>Freq</th> <th>PIC</th> <th>Review status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SADA</td> <td>Purchased for domestic consumption</td> <td>Monitoring water supply</td> <td>Mth</td> <td>AM Mgr</td> <td>Liaison with Authority</td> </tr> <tr> <td>2</td> <td>Rain water</td> <td>Domestic use Workshop Chemical mixing</td> <td>Rain fall data</td> <td>On-going</td> <td>AM Mgr</td> <td>Water harvesting for general washing</td> </tr> <tr> <td>3</td> <td>Water tank</td> <td>Emergency water supply</td> <td>-</td> <td>-</td> <td>AM Mgr</td> <td>Request water supply from other estates</td> </tr> </tbody> </table>		Water source	Usage	Monitoring & measurement	Freq	PIC	Review status	1	SADA	Purchased for domestic consumption	Monitoring water supply	Mth	AM Mgr	Liaison with Authority	2	Rain water	Domestic use Workshop Chemical mixing	Rain fall data	On-going	AM Mgr	Water harvesting for general washing	3	Water tank	Emergency water supply	-	-	AM Mgr	Request water supply from other estates	<p>Complied</p>
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		5	Re-streaming	Re stream from sterilizer condensate pit for dilution	Mill engineer	On-going																																				
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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</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</p>					Complied																																			

<p>of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>River Reserve in Sime Darby Plantation dated April 2014). The buffer zones established are as follows:</p> <table border="1" data-bbox="1099 456 1809 579"> <thead> <tr> <th></th> <th>River width</th> <th>Buffer zone</th> <th></th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>> 40 m</td> <td>50 m</td> <td>4</td> <td>5 - 10 m</td> <td>10 m</td> </tr> <tr> <td>2</td> <td>20 - 40 m</td> <td>40 m</td> <td>5</td> <td>< 5 m</td> <td>5 m</td> </tr> <tr> <td>3</td> <td>10 - 20 m</td> <td>20 m</td> <td>-</td> <td></td> <td>-</td> </tr> </tbody> </table> <p>The signboards were displayed accordingly at the site where applicable. The guideline was issued by the GSD Unit with latest revision dated on 13/06/2011. During the field visit there was no spraying activities or signs left in such an area. The buffer zones identified at the estates are as follows:</p> <table border="1" data-bbox="1093 759 1778 975"> <thead> <tr> <th></th> <th>Estate/Mill</th> <th>Buffer zone area</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Somme Estate</td> <td>Nil</td> </tr> <tr> <td>2</td> <td>Jentayu Estate</td> <td>Catchment Pond P 00JB</td> </tr> <tr> <td>3</td> <td>Bkt Hijau Estate</td> <td>River Reserve Sg Selambau</td> </tr> <tr> <td>4</td> <td>Sg Dingin POM</td> <td>Water catchment area / POME pond</td> </tr> </tbody> </table> <p>Samples are taken from the mill and estates for detection of any pollution arising from the mill and estates activities. Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. Among others parameters as shown below:</p> <p>Among others management plan taken:</p> <ol style="list-style-type: none"> a) Regular inspection at buffer/HCV areas b) Monitor water from surrounding areas c) Track, measure and report all activities around river d) Train and educate workers. 		River width	Buffer zone		River width	Buffer zone	1	> 40 m	50 m	4	5 - 10 m	10 m	2	20 - 40 m	40 m	5	< 5 m	5 m	3	10 - 20 m	20 m	-		-		Estate/Mill	Buffer zone area	1	Somme Estate	Nil	2	Jentayu Estate	Catchment Pond P 00JB	3	Bkt Hijau Estate	River Reserve Sg Selambau	4	Sg Dingin POM	Water catchment area / POME pond	
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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 Jadwal Pematuhan SDPOM disposed effluent on land application via furrow system in Sg Dingin Estate. Sighted quarterly report has been submitted to DOE (license no 0003648 01/07/2021 - 30/06/2022) by quarterly basis. Latest submission for to DOE on 16/4/2022 for period Jan to Mac 2022. Among others the indicators were:</p> <table border="1"> <thead> <tr> <th></th> <th>Jan – Mac 22</th> <th>STD</th> <th>11/1/22</th> <th>6/2/22</th> <th>7/3/22</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>5-9</td> <td>7.70</td> <td>8.00</td> <td>7.90</td> </tr> <tr> <td>2</td> <td>BOD mg/l</td> <td>5000</td> <td>222</td> <td>100</td> <td>129</td> </tr> <tr> <td>3</td> <td>A Nitrogen</td> <td>-</td> <td>4.00</td> <td>119.0</td> <td>114.0</td> </tr> <tr> <td>4</td> <td>Total N</td> <td>-</td> <td>194</td> <td>153</td> <td>177</td> </tr> </tbody> </table>		Jan – Mac 22	STD	11/1/22	6/2/22	7/3/22	1	pH	5-9	7.70	8.00	7.90	2	BOD mg/l	5000	222	100	129	3	A Nitrogen	-	4.00	119.0	114.0	4	Total N	-	194	153	177	Complied																														
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>The mill processing water are obtained from the SADA and water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis. The usage in 2021 is as follows;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Month</th> <th>Water/mt</th> <th>FFB /mt</th> <th>Water /FFB</th> </tr> </thead> <tbody> <tr><td>1</td><td>Jan</td><td>27420</td><td>15765</td><td>1.74</td></tr> <tr><td>2</td><td>Feb</td><td>32200</td><td>19958</td><td>1.61</td></tr> <tr><td>3</td><td>Mac</td><td>43320</td><td>27840</td><td>1.56</td></tr> <tr><td>4</td><td>Apr</td><td>46726</td><td>28662</td><td>1.63</td></tr> <tr><td>5</td><td>May</td><td>46118</td><td>27083</td><td>1.07</td></tr> <tr><td>6</td><td>Jun</td><td>44086</td><td>25732</td><td>1.71</td></tr> <tr><td>7</td><td>July</td><td>42249</td><td>25555</td><td>1.65</td></tr> <tr><td>8</td><td>Aug</td><td>44003</td><td>24635</td><td>1.79</td></tr> <tr><td>9</td><td>Sep</td><td>39130</td><td>21235</td><td>1.84</td></tr> <tr><td>10</td><td>Oct</td><td>37995</td><td>23875</td><td>1.59</td></tr> <tr><td>11</td><td>Nov</td><td>25994</td><td>20439</td><td>1.27</td></tr> <tr><td>12</td><td>Dec</td><td>26070</td><td>18341</td><td>1.42</td></tr> </tbody> </table>	No	Month	Water/mt	FFB /mt	Water /FFB	1	Jan	27420	15765	1.74	2	Feb	32200	19958	1.61	3	Mac	43320	27840	1.56	4	Apr	46726	28662	1.63	5	May	46118	27083	1.07	6	Jun	44086	25732	1.71	7	July	42249	25555	1.65	8	Aug	44003	24635	1.79	9	Sep	39130	21235	1.84	10	Oct	37995	23875	1.59	11	Nov	25994	20439	1.27	12	Dec	26070	18341	1.42	Complied
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Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																	
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report 2022. The document was reviewed/updated on Jan 2022. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p>				Complied											
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The utilization of fossil fuel in 2021 is being monitored with records shown below in Diesel L/FFB mt :

Mth	SDPOM	SE	JTE	BHE
Jan	0.25	3.48	2.35	4.96
Feb	0.11	1.73	1.22	2.62
Mac	0.11	1.70	1.12	2.00
Apr	0.12	2.59	1.09	1.47
May	0.25	6.09	1.26	1.34
Jun	0.14	5.03	1.65	2.75
July	0.10	1.98	2.11	3.01
Aug	0.12	1.14	2.12	2.73
Sep	0.30	1.86	1.69	2.53
Oct	0.27	1.65	1.42	2.85
Nov	0.27	2.73	1.71	2.97
Dec	0.18	2.85	2.23	1.94

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

Performance variation in view of several factors i.e.

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

		<p>There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p> <p><u>Sg Dingin Mill and SOU 01 Estates</u></p> <p>A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2022 identified in the following</p> <ul style="list-style-type: none"> a) Environmental Aspect Identification Summary FY 2022 reviewed accordingly. b) Environmental Impact Evaluation Summary FY 2022 reviewed accordingly. <p>Renewable energy usage & diesel consumption 2021 was established and monitored by monthly basis. Among others effort to reduce diesel usage includes the following;</p> <ul style="list-style-type: none"> a) By maintenance of the boiler & machinery to ensure at optimum level b) to monitor diesel usage c) provide training to workers regarding reduce fuel and diesel usage for boiler. 	
<p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 01 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 adversely impact the environment. 	Complied

		b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.													
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>	SOU 01 has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. There is no new development within the SOU 01 estates.	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. The CU 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. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:</p> <table border="1"> <thead> <tr> <th></th> <th>Environmental Receptors</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>land</td> <td>Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.</td> </tr> </tbody> </table>		Environmental Receptors	Source	1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).	2	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.	Complied
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		<p>Sg Dingin Mill conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS was found to be in functional condition. Data from the stack is connected online to DOE's office. Boiler smoke emission data are within the DOE limit.</p> <p>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent.</p> <p>'Pollution prevention plan and waste management action plan" is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly. Among of action has been taken by CU were:</p> <ul style="list-style-type: none"> a) Scheduled wastes – were disposed through Pentas Flora Sdn Bhd, Sime Darby Industrial, Sdn Bhd and Flora Santos Sdn Bhd (clinical waste). b) Domestic wastes are disposed to Majlis Daerah Kulim landfill twice a week accumulated at designated area located far from housing complexes and waterways for all estates and mill. c) Full compliance to zero burning practices. 	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
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 01 and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> a) EQMS-SOP-Section B2 - Under felling/clearing & land preparation b) Carbon Policy 	Complied

		<p>As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>																					
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>This is established in the ERP procedure <i>Kertas Kerja Program Simulasi Kebakaran</i> dated 12/9/2019. Therein containing</p> <ul style="list-style-type: none"> a) Objective b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill <p>The procedure was formalized by RSQM for use in all operating units in SDP Estates and mills. Training related to fire drill / prevention are conducted annually.</p> <table border="1" data-bbox="1126 890 1863 1125"> <thead> <tr> <th></th> <th>Estate / Mill</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bkt Hijau Estate</td> <td>17/03/22</td> <td>15/07/21</td> </tr> <tr> <td>2</td> <td>Jentayu Estate</td> <td>29/03/22</td> <td>22/02/21</td> </tr> <tr> <td>3</td> <td>Somme Estate</td> <td>29/03/22</td> <td>30/03/21</td> </tr> <tr> <td>4</td> <td>Sg Dingin POM</td> <td>02/03/22</td> <td>25/01/21</td> </tr> </tbody> </table>		Estate / Mill	Date	Date	1	Bkt Hijau Estate	17/03/22	15/07/21	2	Jentayu Estate	29/03/22	22/02/21	3	Somme Estate	29/03/22	30/03/21	4	Sg Dingin POM	02/03/22	25/01/21	Complied
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7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Both the estates and the mill in SOU 01 held engagement with the adjacent stakeholders via briefing sessions as stated in ERP procedure <i>Kertas Kerja Program Simulasi Kebakaran</i> Lampiran A and Fire Prevention and Control Measure.</p> <ul style="list-style-type: none"> a) Objective b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill e) Compliance to related legislative requirement f) Compliance to Human Rights Charter <p>All stakeholders being briefed in the respective stakeholders meetings. This is inclusive on the fire prevention and control measures akin to the earlier session in meetings. Session in 2021 were made via form feedback distribution due to MCO restriction.</p> <table border="1" data-bbox="1070 863 1883 1018"> <thead> <tr> <th></th> <th>OU</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Somme Estate</td> <td>27/04/22</td> <td>16/02/21</td> </tr> <tr> <td>2</td> <td>Jentayu Estate</td> <td>05/04/22</td> <td>11/03/21</td> </tr> <tr> <td>3</td> <td>Bkt Hijau Estate</td> <td>23/05/22</td> <td>09/04/21</td> </tr> <tr> <td>4</td> <td>Sg Dingin POM</td> <td>18/05/22</td> <td>07/04/21</td> </tr> </tbody> </table>		OU	Date	Date	1	Somme Estate	27/04/22	16/02/21	2	Jentayu Estate	05/04/22	11/03/21	3	Bkt Hijau Estate	23/05/22	09/04/21	4	Sg Dingin POM	18/05/22	07/04/21	Complied
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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>The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest. Thus requirement in relation to land use change analysis is not necessary.</p>	Complied
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	- Critical (Major) compliance -		
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>The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest</p> <p>Hence the current HCV assessment of the estates remains valid. The recent HCV assessment for the entire SOU 01 covering all the estates and the mill was performed in Mac 2017 by the PSD personnel. Methodology is through site observation, interviews, stakeholders consultation and desktop review on available secondary data. The assessment among others covers the following areas;</p> <p>a) Overview of HCV assessment. b) Description of assessment areas. c) Finding and discussion - landscape context - HCV criteria and application to agriculture</p> <p>d) HCV monitoring and management</p> <p>Nonetheless, Perimeter area i.e., surrounding palms outlook and fencing structure at Jentayu Estate's HCV pond can be further enhanced/maintained (OFI).</p>	OFI
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	NA	Not Applicable
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 01 estates (refer 7.3.1 to 7.4.2).</p> <p>The recent HCV assessment for the entire SOU 01 covering all the estates and the mill was performed in Mac 2017 by the PSD personnel. Methodology is through site observation, interviews, stakeholders</p>	Complied

	<p>relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>consultation and desktop review on available secondary data. The assessment among others covers the following areas;</p> <ul style="list-style-type: none"> a) Overview of HCV assessment. b) Description of assessment areas. c) Finding and discussion <ul style="list-style-type: none"> - landscape context - HCV criteria and application to agriculture d) HCV monitoring and management <p>Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PA/GM and also personnel from the Sustainability unit. Sighting of RTE are made and recorded during the AP rounds in the estates if any. Highlights if any are discussed during the management review or management meetings subject to the urgency of the situation.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>There was no rights of local communities been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas. The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird, presence of wild boar and monkeys occasionally sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan reviewed in Jan 2022.</p>	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.</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 01 estates (refer 7.3.1 to 7.4.2).</p>	Complied

	- Minor compliance -		
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>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 01 estates (refer 7.3.1 to 7.4.2). Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PA/GM and also personnel from the Sustainability unit. Sighting of RTE are made and recorded during the AP rounds in the estates if any.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 01 estates (refer 7.3.1 to 7.4.2).</p>	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2021 for SOU 1 Sungai Dingin Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill data 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 2021 for SOU 1 Sungai Dingin Palm Oil Mill and supply base are as follows:

Emission per product	tCO ₂ e/tProduct
CPO	1.32
PKO	1.32

Extraction	%
OER	20.77
KER	5.48

Production	t/yr
FFB Process	278619.501
CPO Produced	57866.79
PKO Produced	15271.00

Land Use	Ha
OP Planted Area	13,542.17
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	13575.47

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	133981.11	0.67	0.00	0.00	0.00	0.00	133981.11	
CO ₂ Emission from fertilizer	14028.77	0.07	0.00	0.00	0.00	0.00	14028.77	
NO ₂ Emission	6572.04	0.03	0.00	0.00	0.00	0.00	6572.04	
Fuel Consumption	1017.21	0.01	0.00	0.00	0.00	0.00	1017.21	
Peat Oxidation			0.00	0.00	0.00	0.00	0.00	
Sink								
Crop Sequestration	-126996.25	-0.63	0.00	0.00	0.00	0.00	-126996.25	
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Total	28602.88	0.14	0.00	0.00	11776.55	0.00	40379.43	

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	54614.14	0.20
Fuel Consumption	157.48	0.00
Grid Electricity Utilization	1138.25	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	55909.86	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

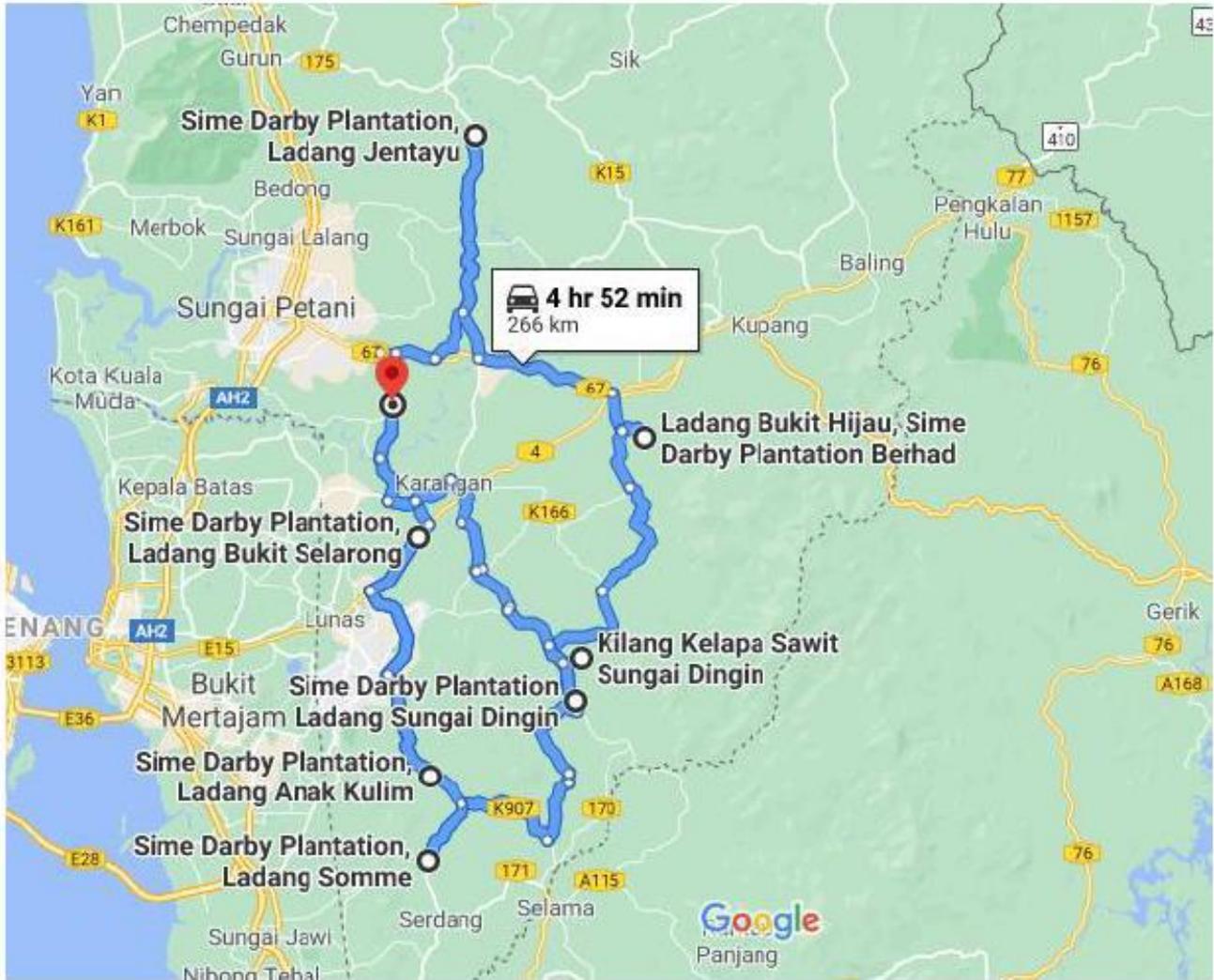
Emissions	tCO ₂ e
PK from own mill	-
PK from other source	-
Fuel Consumptions	-
Total Crusher emissions	-

*This mill has no kernel crusher operation.

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

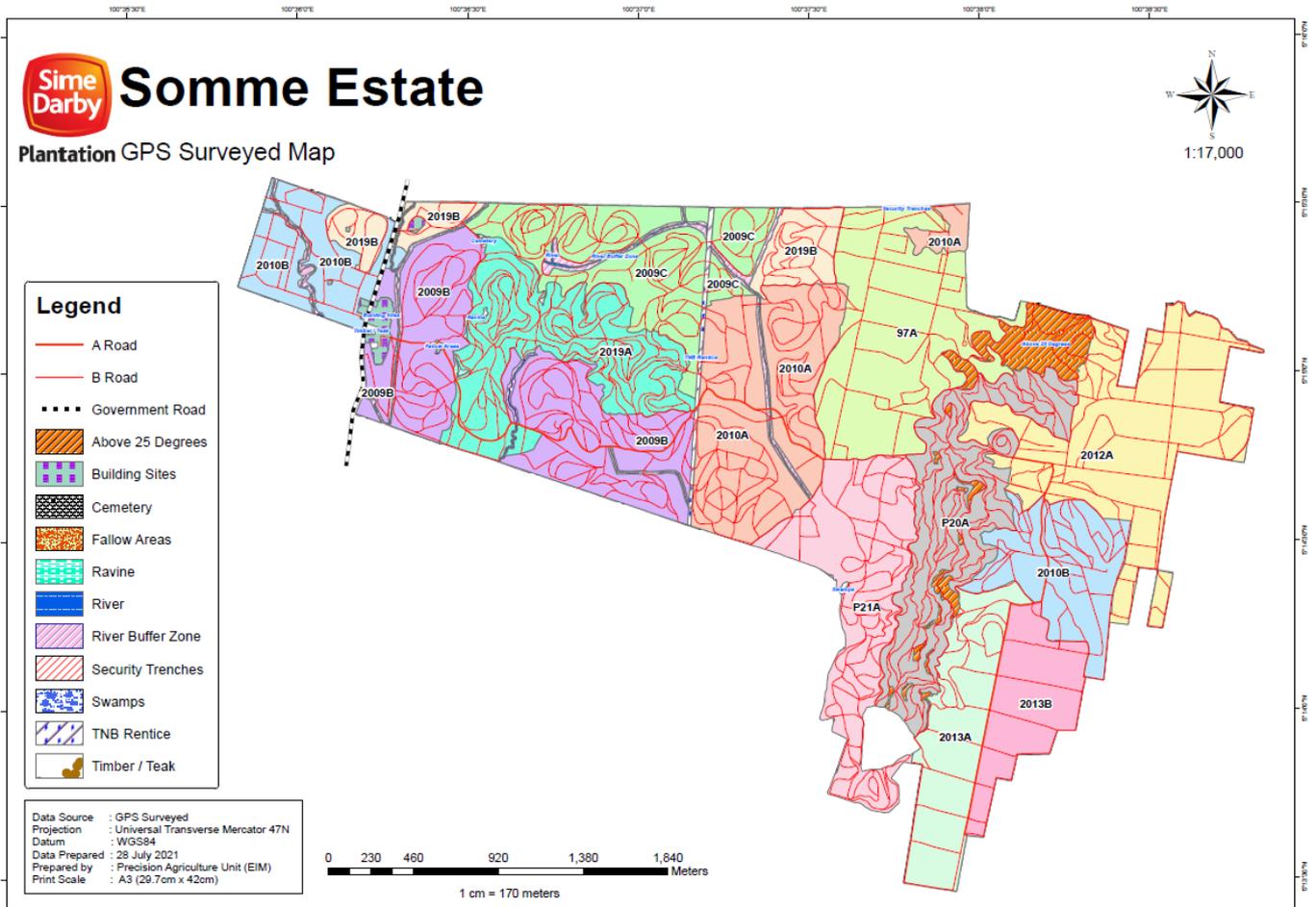
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix C: Location Map of Certification Unit and Supply bases

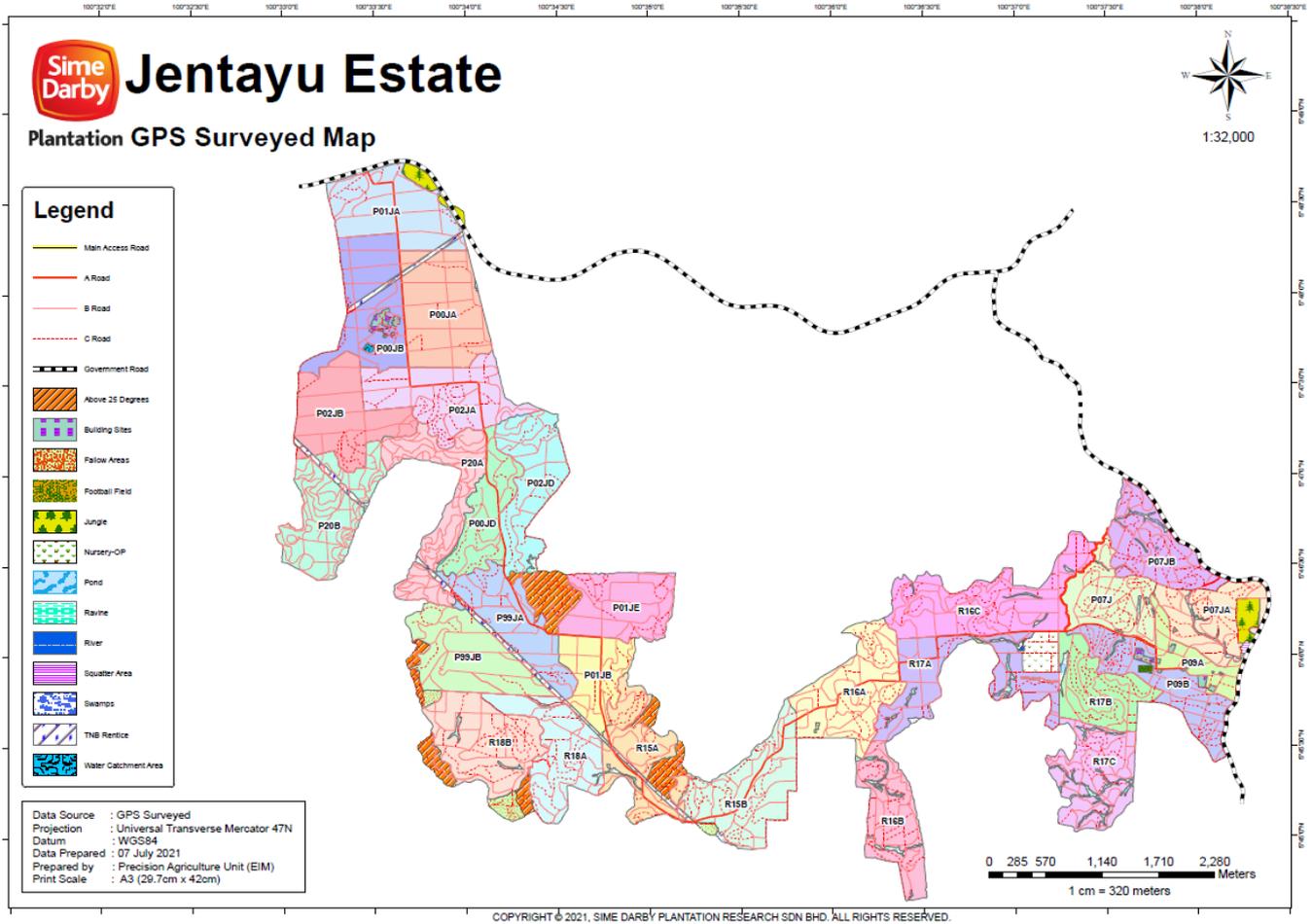


Appendix D: Estate Field Map

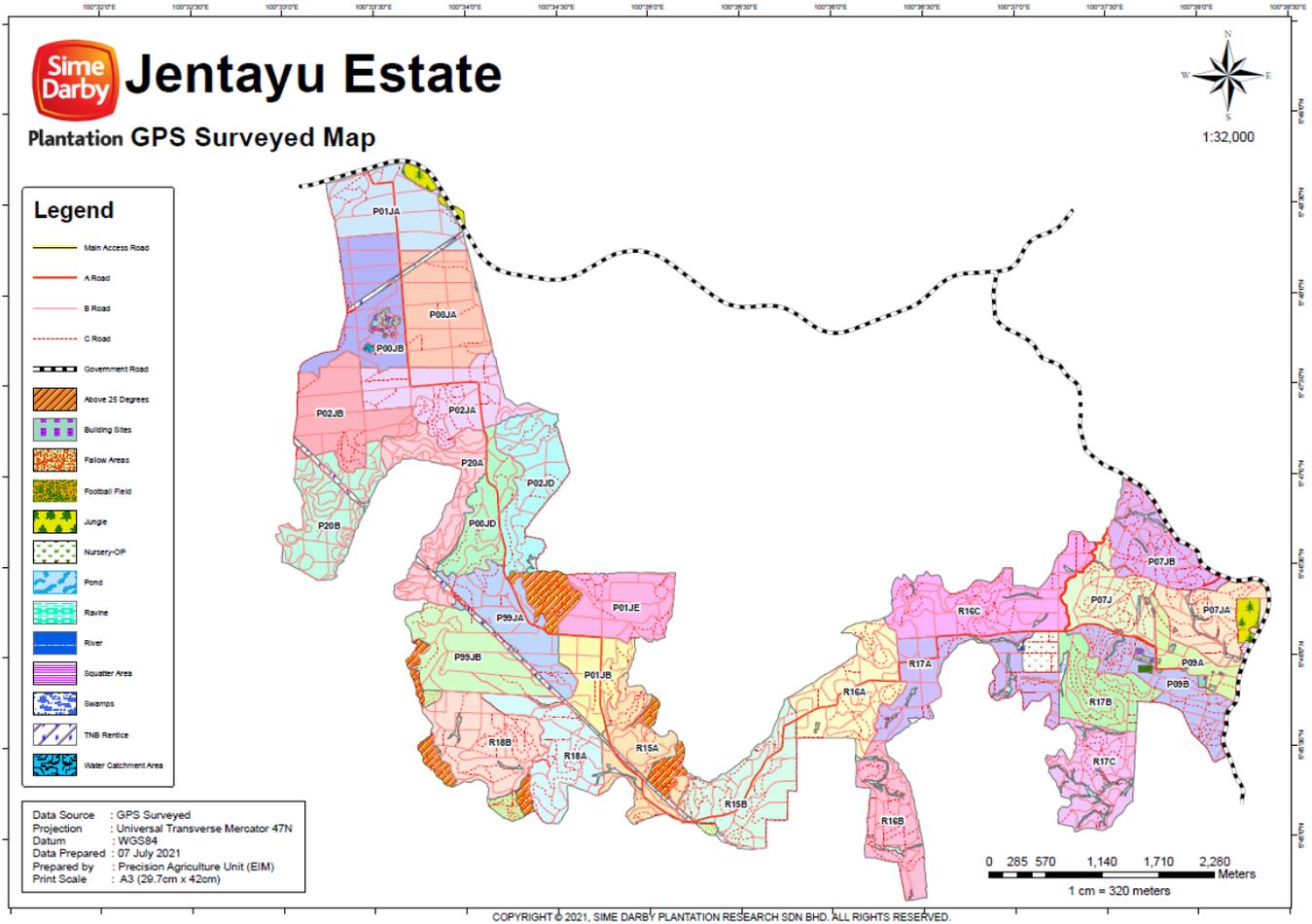
Somme Estate



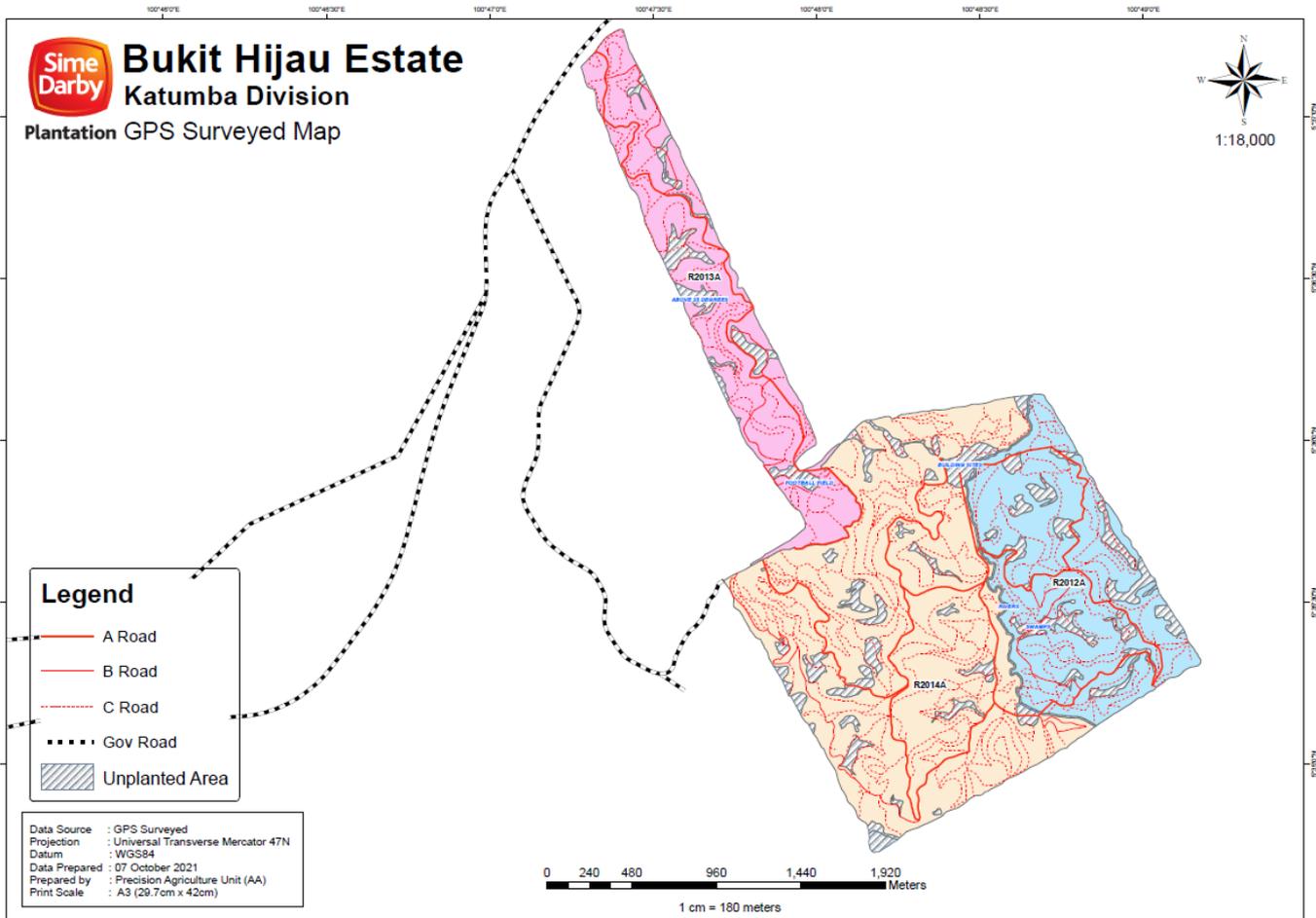
Jentayu Estate



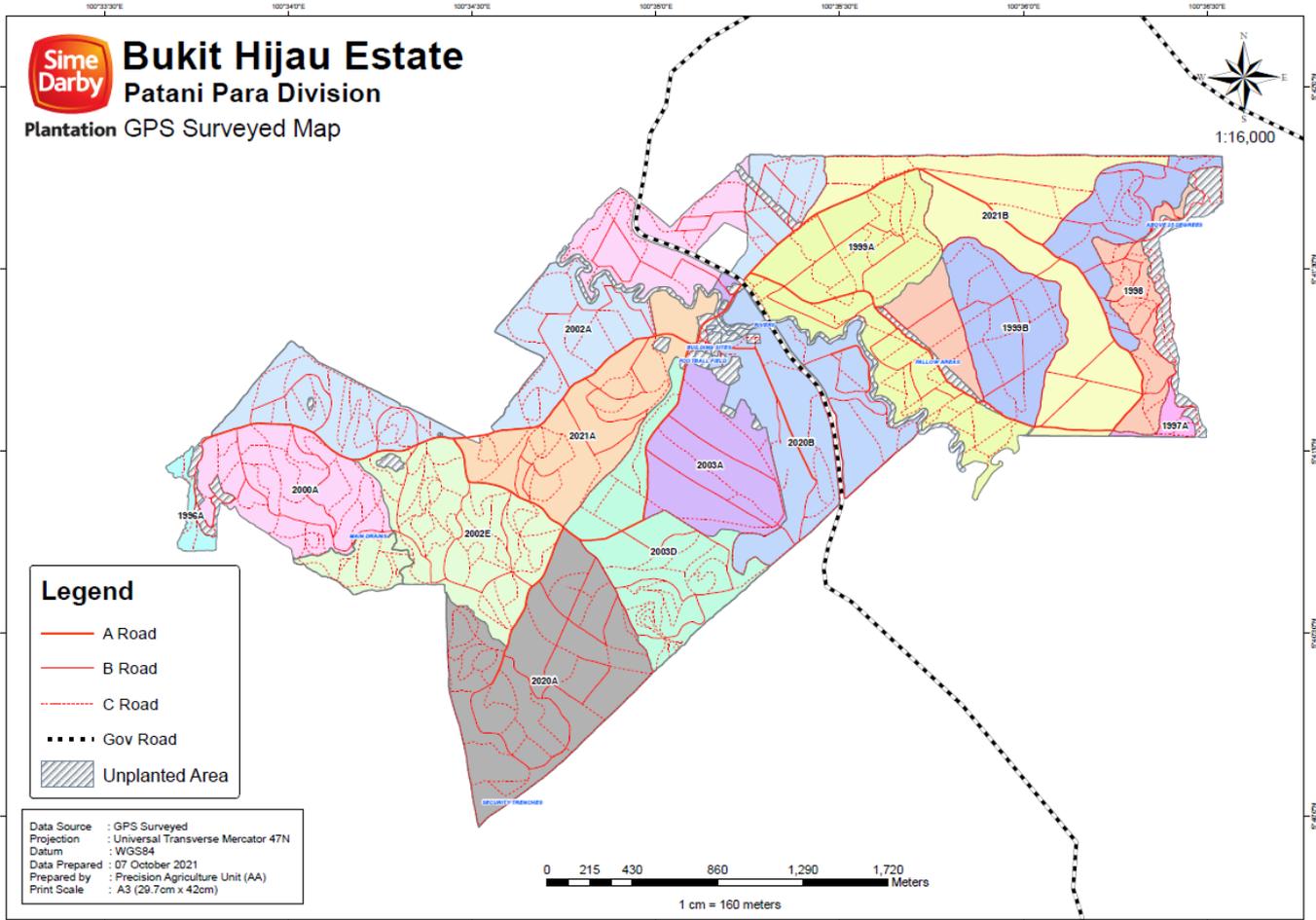
Bukit Hijau Estate (Bukit Hijau Division)



Bukit Hijau Estate (Katumba Division)



Bukit Hijau Estate (Patani Para Division)



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Appendix E: List of Smallholder Registered and/or sampled

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
	N/A								
Total									
Note: * are smallholders sampled in this audit.									

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
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure