

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (2_1)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company Name / Parent Company: Sime Darby Plantation Berhad
Client Company / Parent Company Address: Level 11, Main Block, Plantation Tower, Oasis Ara Damansara, 50490 Kuala Lumpur, Malaysia
Certification Unit: Strategic Operating Unit (SOU) 10 -Bukit Puteri Palm Oil Mill
Location of Certification Unit: Sungai Koyan, 27650 Raub, Pahang, Malaysia
Date of Final Report: 28/09/2022

TABLE of CONTENTS	Page No
Section 1: Scope of the Assessment.....	3
1. Company Details	3
2. Certification Information	3
3. Other Certifications.....	4
4. Location(s) of Mill & Supply Bases	4
5. Description of Supply Base	4
6. Plantings & Cycle.....	4
7. Summary of Certified Tonnage of FFB (Own Certified Scope)	5
8. Summary of Certified Tonnage of FFB (from other certified unit(s))	5
9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate).....	5
10. Summary of Certified Tonnage (MT) (not applicable for ISS)	6
11. Summary of Actual Volume sold	7
12. Independent Smallholders Certified Tonnage (MT) / Volume	9
13. Independent Smallholders Actual Sold Tonnage / Volume	9
Section 2: Assessment Process	10
2.1 Assessment Methodology, Programme, Site Visits.....	10
2.2 BSI Assessment Team	11
1.3 Assessment Plan.....	12
Section 3: Assessment Findings	15
3.1 Multiple Management Units and Time Bound Plan.....	15
3.2 Progress of scheme smallholders and/or outgrowers.....	19
3.3 Details of Nonconformities	37
3.3.1 Status of Nonconformities Previously Identified and Observations.....	39
3.3.2 Summary of the Nonconformities and Status	50
3.4 Stakeholders and previous land owner / user consultation.....	51
3.5 Impartiality and conflict of interest	53
Formal Signing-off of Assessment Conclusion and Recommendation	54
Appendix A: Summary of Findings	55
Appendix B: GHG Reporting Executive Summary	137
Appendix C: Location Map of Certification Unit and Supply bases.....	139
Appendix D: Estate Field Map.....	140
Appendix E: List of Smallholder Registered and/or sampled	141
Appendix F: List of Abbreviations.....	142

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 11, Main Block, Plantation Tower, Oasis Ara Damansara, 50490 Kuala Lumpur, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU) 10 - Bukit Puteri Palm Oil Mill		
Location / Address	Sungai Koyan, 27650 Raub, Pahang, Malaysia		
Website	https://sime-darbyplantation.com/		
Management Representative	Shylaja Devi Vasudevan Nair	E-mail	shylaja.vasudevan@sime-darbyplantation.com
Telephone	+03-78484379	Facsimile	+03-78484363

2. Certification Information			
Certificate Number	RSPO 745403	Certificate Start Date	07/07/2021
Date of First Certification	07/07/2011	Certificate Expiry Date	06/07/2026
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	<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_1) <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	20 tonne/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 745405	MS 2530-3 :2013 Malaysian Sustainable Palm Oil (MSPO) Part 3	BSI Services Malaysia Sdn. Bhd.	26/11/2022
MSPO 745404	MS 2530-4 :2013 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn. Bhd.	26/11/2022
MSPO 745406	MSPO Supply Chain Certification Standard 2018	BSI Services Malaysia Sdn. Bhd.	24/10/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Bukit Puteri Palm Oil Mill	Sungai Koyan, 27650 Raub, Pahang, Malaysia	4° 12' 08.71" N	101° 51' 47.24" E
Bukit Puteri Estate	Sungai Koyan, 27650 Raub, Pahang, Malaysia	4° 11' 40.96" N	101° 53' 22.20" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Puteri Estate	3,660.82	21.36	160.33	3,842.51	95.27
Total	3,660.82	21.36	160.33	3,842.51	95.27

Note: Area changes due to land area resurvey conducted in estate.

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Bukit Puteri Estate	203.75	2,113.49	416.06	927.52	3,457.07	203.75
Total (ha)	203.75	2,113.49	416.06	927.52	3,457.07	203.75

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

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jul 21 – Jun 22)	Actual (Apr 21 – Mar 22)		Forecast (Jul 22 – Jun 23)
Previous license period (Apr21 – Jun 21)		Current license period (Jul 21 – Mar 22)		
Bukit Puteri Estate	50,000.00	13,728.98	34,739.91	69,287.00
Total	50,000.00	48,468.89		69,287.00

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate* / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jul 21 – Jun 22)	Actual (Apr 21 – Mar 22)		Forecast (Jul 22 – Jun 23)
Previous license period (Apr21 – Jun 21)		Current license period (Jul 21 – Mar 22)		
Kerdau Estate		-	84.17	
Sungai Mai Estate		-	734.94	
Mentakab Estate		-	161.60	
Total		980.71		

Note: RSPO Certificate # RSPO 745399 (Sime Darby Plantation SOU 11 – Kerdu Palm Oil Mill); Expiry date: 06/07/2026

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Jul 21 – Jun 22)	Actual (Apr 21 – Mar 22)		Forecast (Jul 22 – Jun 23)
Previous license period (Apr21 – Jun 21)		Current license period (Jul 21 – Mar 22)		
Outside Crops Purchased (OCP)	N/A	4,074.67	14,915.31	N/A
Total	N/A	18,989.98		N/A

Note: -

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

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	4,614.62	1,600.38	6,454.89
2	May-21	4,576.12	1,992.92	6,808.94
3	Jun-21	4,538.24	1,960.65	6,738.78
4	Jul-21	4,443.96	1,755.80	6,199.76
5	Aug-21	5,699.50	2,774.85	8,474.35
6	Sep-21	4,569.77	1,442.25	6,012.02
7	Oct-21	5,192.55	2,517.69	7,710.24
8	Nov-21	2,423.73	463.30	2,167.35
9	Dec-21	3,665.54	1,636.99	5,302.53
10	Jan-22	3,559.30	1,227.49	4,786.79
11	Feb-22	2,740.49	1,414.79	2,740.49
12	Mar-22	3,425.78	1,617.66	5,043.44
TOTAL		49,449.60	18,989.98	68,439.58

Note: -

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Jul 21 – Jun 22)	Actual (Apr 21 – Mar 22)		Forecast (Jul 22 – Jun 23)
	Previous license period (Apr21 – Jun 21)	Current license period (Jul 21 – Mar 22)	
FFB	FFB		FFB
50,490.00 mt	13,728.98 mt	35,720.62 mt	69,287.00 mt
	TOTAL	49,449.60 mt	
CPO (OER: 21.00 %)	CPO (OER: 21.30 %)		CPO (OER: 20.97 %)
10,600.00 mt	2,924.27 mt	7,608.49 mt	14,529.48 mt
	TOTAL	10,532.76 mt	
PK (KER: 4.90 %)	PK (KER: 4.32 %)		PK (KER: 4.82 %)
2,477.00 mt	593.09 mt	1,543.13 mt	3,339.63 mt
	TOTAL	2,136.22 mt	

Note: -

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

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Apr-21	982.91	199.35
2	May-21	974.71	197.69
3	Jun-21	966.65	196.05
4	Jul-21	946.56	191.98
5	Aug-21	1,213.99	246.22
6	Sep-21	973.36	197.41
7	Oct-21	1,106.01	224.32
8	Nov-21	516.25	104.71
9	Dec-21	780.76	158.35
10	Jan-22	758.13	153.76
11	Feb-22	583.74	118.39
12	Mar-22	729.69	147.99
TOTAL		10,532.76	2,136.22

Note: -

11. Summary of Actual Volume sold					
Current License period (Jul 21 – Mar 22)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	-	-	-	6,854.69	6,854.69
PK (MT)	711.94	-	-	536.69	1,248.63
Credits	-	-	-	-	-
Previous License period (Apr – Jun 21)					
CPO (MT)	745.31	-	-	1,967.36	2,712.67
PK (MT)	-	-	-	472.40	472.40
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	A	TR-a041b6cf-8d36 TR-c2f1d4c3-4a80	745.31	0.00

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

		TR-7e60aa65-8fce TR-b0068a75-e219		
2	B	TR-fd12162b-6829 TR-25aa33ac-a4cb TR-279846f9-0aac TR-0fb42e84-9dd2 TR-546f61f0-f865 TR-3e46de62-8f06 TR-740b2c7e-9d83	0.00	711.94
TOTAL			745.31	711.94
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	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A
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	D	8,822.05	-
2	E	-	1,009.09
TOTAL		8,822.05	1,009.09
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	N/A	N/A	N/A
TOTAL			N/A
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			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
Nil	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL		N/A	N/A	N/A	N/A	N/A

Note: 1 mt = 1 credit

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				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period (Not Applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
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)
Nil	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A	N/A	N/A	N/A

Note:

Section 2: Assessment Process

Certification Body:

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

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 5-8 April 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 Critical NC close out on-site assessment was conducted off-site due to the nature of findings that able to be verified through documents verification submitted by client via email.

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.

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

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 (RC2)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_4)
Bukit Puteri Palm Oil Mill	✓	✓	✓	✓	✓
Bukit Puteri Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: April 3, 2023 - April 6, 2023

Total Number of Mandays: 9

2.2 BSI Assessment Team

Name	Role	Competency
Hafriazhar Mohd. Mokhtar (HMM)	Team Leader	<p>Education: Bachelor of Engineering (Hons.) Chemical Engineering, UTM.</p> <p>Work Experience: Nearly 20 years of working experience in multiple engineering disciplines emphasized on science, technology and sustainability. He acquired many skills from being involved in various industrial environments ranging from construction, plantation and mining before shifted into auditing. In short, his career began as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in plantation, Project Control Engineer (2008-2011) in mining and Auditor/Client Manager (2011-present) in certifications auditing.</p> <p>Training attended: Social Auditing & SMETA Training (2021), ISO 45001 LA Training (2018), MSPO LA Training (2017), RSPO SCCS LA Training (2016), RSPO P&C LA Training (2015), ISO 9001 LA Training (2013), ISO 50001 LA Training (2012), ISO 14001 LA Training (2011).</p> <p>Aspect covered in this audit: During this assessment, he covered Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue and RSPO Supply Chain, General Custody of Chain, Rules on Market Communications & Claims.</p> <p>Language proficiency: Bahasa Malaysia and English.</p>
Muhamad Naqiuddin Mazeli (MNM)	Team Leader	<p>Education: Bachelor of Science Horticulture, University Putra Malaysia</p> <p>Work Experience: 11 years working experience in oil palm industry managing sustainability implementation and certification of RSPO P&C, ISCC, and ISO9001 and ISO 18001 for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO and other certifications where applicable to the operations during previous company.</p> <p>Training attended: ISO 9001: 2015 LA Training (2018), ISO 14001: 2015 LA Training (2019), ISO 45001: 2018 LA Training (2019), HCV & HCS Training</p>

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

		<p>(2020), RSPO P&C LA Training (2018), RSPO SCCS LA Training (2019) and Social Auditing & SMETA Training (2021)</p> <p>Aspect covered in this audit: During this assessment, he covered aspects of economic management plan, mill best practices, Occupation Health Safety requirement, HIRARC, training and management plan and RSPO supply chain requirements.</p> <p>Language proficiency: English and Bahasa Malaysia</p>
<p>Yusof Khairan Nizar Ahmad Tarmizi (YKN)</p>	<p>Team Member</p>	<p>Education: Holds a Bachelor of Corporate Administration (Hons), MARA University of Technology and a Master of Science in Occupational Safety and Health Management-Northern University of Malaysia.</p> <p>Work Experience: Has more than 30 years of working experience in varies industries including as safety officer in manufacturing company; consultant and trainer for management systems including ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, OHSAS 18001:2007, MS1722:2011, Environmental Legislation; contract auditor with varies accredited certification bodies for scheme including Malaysia Sustainable Palm Oil (MSPO), RSPO Principles & Criteria; MPOCC Registered Peer Reviewer and was a Certificate of Safety and Health Officer-Malaysian Insurance Institute.</p> <p>Training attended: He has completed ISO 9001:2000 IRCA/IATC A Lead Auditor Training; ISO 14001:2004 IEMA Approved EMS Advanced Lead Auditor Training Course; OH&SMS IRCA Certified Lead Auditor Training Course; MS 1722 Lead Auditor Training; MSPO Auditing; Endorsed RSPO P&C 2018 Lead Auditor Course; SMETA Requirements Training; HCV & HCS Introductory Training. Also attended the Quality & Environmental MS Auditing Skills Based on Risk Management, Conformity Assessment – For Bodied Providing Audit and Certification (ISO/IEC 17021:2015) collaboration with Institute of Quality Malaysia, ISO/IEC 17021. MSPO Peer Reviewer Training (MPOCC).</p> <p>Aspect covered in this audit: During the assessment, he covered economic management plan, estate best practices, natural and biodiversity conservation, Waste management, GHG, HCV, Environment responsibility, training, environment impact assessment and management plan and RSPO supply chain requirements.</p> <p>Language proficiency: Bahasa Malaysia and English.</p>

Accompanying Persons:

Name	Role
Nil	N/A

1.3 Assessment Plan

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

Date	Time	Subjects	HMM	MNM	YKN
Monday, 4/4/2022	PM	Audit team travel to Kuala Lipis	✓	✓	✓

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

Date	Time	Subjects	HMM	MNM	YKN
Tuesday, 5/4/2022 Day 1 Bukit Puteri Estate	9:00 AM – 9:30 AM	Opening meeting (combine with MSPO) • Opening presentation by audit team leader • Confirmation of assessment scope and finalize audit plan	✓	✓	✓
	9:30 AM – 12:30 PM	Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	12:30 PM – 1:30 PM	Lunch/Prayer break	✓	✓	✓
	1:30 PM – 4:30 PM	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.)	✓	✓	✓
	4:30 PM – 5:00 PM	• Auditors discussion • Day 1 Interim Closing Briefing	✓	✓	✓
Wednesday, 6/4/2022 Day 2 Bukit Puteri Estate & Bukit Puteri POM	9:00 AM – 12:30 PM	Bukit Puteri Estate: - Continue with field and/or facilities visit (if any) - Continue with documents review	✓	✓	✓
	10:00 AM – 12:00 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	✓	-	-
	12:30 PM – 1:30 PM	Lunch break	✓	✓	✓
	1:30 PM – 4:30 PM	Bukit Puteri POM: Document Review P1 – P7: SOPs, review on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation	✓	✓	✓
	4:30 PM – 5:00 PM	• Auditors discussion • Day 2 Interim Closing Briefing	✓	✓	✓

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

Date	Time	Subjects	HMM	MNM	YKN
Thursday, 7/4/2022 Day 3 Bukit Puteri POM	9:00 AM – 12:30 PM	Plant visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, lab, weighbridge, and palm product storage area etc.	✓	✓	✓
	12:30 PM – 1:30 PM	Lunch break	✓	✓	✓
	1:30 PM – 4:30 PM	Bukit Puteri POM: - Continue with plant and/or facilities visit (if any) - Continue with documents review	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> • Auditors discussion • Day 3 Interim Closing Briefing 	✓	✓	✓
Friday, 8/4/2022 Day 4 Bukit Puteri POM	9:00 AM – 12:00 PM	Document Review SCCS: RSPO SCC general requirements, supply chain for CPO mill, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	✓	-	-
	12:00 PM – 12:30 PM	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://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations .	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	Yes. Generally all estates and mills excepted stated below or in the TBP are 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, 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 and on 01/10/2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently Sime Darby Plantation Berhad 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.	There is no new acquisition.	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.	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	Complied

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

<p>Is this consistent with the ACOP reporting?</p>	<p>under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties was sold and currently SDP have no control in the management. The property was disposed on 25 June 2019 and an official letter on disposal of PT Mas was sent to RSPO Secretariat on 27 June 2019. Last meeting with all relevant stakeholders was done with RSPO CP during recent RT in Bangkok last November 2019.Both parties have responded to the legal reviewer report and submitted the comment to RSPO CP.</p> <p>Malaysia - Pekaka Mill is being mothballed (at the time of SDP Annual Report 2018) and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang. Bintang Oil Mill: SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 1st Oct 2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public notification letter: https://www.rspo.org/certification/public-announcement.</p> <p>For Liberia operations: As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operation</p> <p>ACOP 2021 has been cross-referenced as below: https://www.rspo.org/members/29/Sime-Darby-Plantation-Berhad</p>	
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>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</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>

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

of the plan? If yes a Major non-compliance shall be raised		
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	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.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification</p> <ol style="list-style-type: none"> 1. NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-plantation-berhad-nbpol-poliamba-limited 2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd 3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-ramu-agri-industries-ltd 4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd-ramu-agri-industries-limited 5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd-higaturu-oil-palms 6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-poliamba-limited-lamawan-png 7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-poliamba-limited-lamendauen-png 8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website 	Complied

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

	<p>https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd.-roka-mini-estate 9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd.-j-estate 10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-limited-higaturu-oil-palm 11. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc-new-planting-assessment 12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc.-new-planting-assessment-1 13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc.-new-planting-assessment 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. 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</p>	<p>Sime Darby Plantation maintain corporate governance to monitor and address any legal non-compliances. Through the published Code of</p>	<p>Complied</p>

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

requirements of RSPO P&C criteria 2.1	Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.	
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes. The sustainability unit has conducted 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 are mainly awaiting for Land Titles. The last audit was conducted in August 2021. 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.	Complied
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 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. There is no scheme smallholders and/ or out-growers include in the scope of certification.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable.	Not Applicable

Approved Time Bound Plan

SDP- RSPO Certification Status for 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					

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

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	

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

		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					

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

		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					

		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					

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

		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

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

							hold. As at 1st Oct 2018, the mill has completed the selling off transaction.
--	--	--	--	--	--	--	---

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				
4	PT Langgeng Muaramakmur	Bebunga Mill	-	-		Certified	16/03/2012	KKPA & Plasma is not under the management control of Sime Darby
		Bebunga Estate						

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

		Sungai Cengal Estate			Kotabaru District – South Kalimantan			Plantation. The decision of certification is from KKPA / Plasma themselves.
		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						
9	PT Bersama Sejahtera Sakti	Gunung Aru Mill	-			Certified	05/07/2011	-
		Gunung Aru Estate						

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

		Gunung Kemas Estate			Kotabaru District – South Kalimantan				
		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							01/04/2014
		Betung Estate							
		Sekayu Estate							
12		Sekunzir Mill	-	-		Certified	23/11/2010	-	

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

	PT Indotruba Tengah	Sekunyir Seruyan Estate			Seruyan and West Kotawaringin District – Central Kalimantan			
13	PT Swadaya Andika	Selabak Mill Selabak Estate Randi Estate Sangkoh Estate Lanting Estate	-	-	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.
14	PT Bina Sains Cemerlang	Sungai Pinang Mill Sungai Pinang Estate Bukit Pinang Estate	-	-	Musi Rawas District – South Sumatera	Certified	11/09/2012	Remarks: Land legalisation process for 308.35 ha is still in process.
15	PT Teguh Sempurna	Pemantang Mill Pemantang Estate Kawan Batu Estate Hatan Tiring Estate Batang Garing Estate	-	-	Seruyan and East Kotawaringin District – Central Kalimantan	Certified	05/07/2011	-
16	PT Bhumireksa Nusa Sejati	Teluk Bakau Mill Teluk Bakau Estate Nusa Lestari Estate Nusa Perkasa Estate Mandah Mill Mandah Estate Rotan Semelur Estate	-	-	Indra Giri Hilir District – Riau	Certified	11/10/2011 01/04/2014	-
17		Teluk Siak Mill	-	-		Certified	11/10/2011	-

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

	PT Intipersada Aneka	Teluk Siak Estate			Pekanbaru, Siak District – Riau				
		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 – Nangroe 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 Natapalma Sandika	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							
		Awatan Estate							

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

		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)					
4	Ramu Agricultural Industrial Ltd (RAIL)	Gusap Mill	-	Morobe Province, PNG	Certified	05/08/2010	-
		Gusap East (Gusap) Estate					

		Gusap West (Paddox) Estate					
		Surinam Estate					
		Dumpu Estate					
		Ngaru Estate					
		J Estate (Jephcott) Estate					
		Smallholders - Madang VOPs (71)					
		Smallholders - Morobe VOPs (253)					
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	-	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	-	Kimbe, West New Britain, PNG	Certified	10/09/2008	-
		Kumbango Oil Mill					
		Kapiura Mill					

		Numundo Mill				
		Waraston Mill				
		Bebere Estate				
		Kumbango Estate				
		Togulo Estate				
		Dami Estate				
		Waisisi Estate				
		Kautu Estate				
		Karausu Estate				
		Moroa Estate				
		Bilomi Estate				
		Loata Estate				
		Haella Estate				
		Garu Estate				
		Daliavu Estate				
		Sapuri Estate				
		Malilimi Estate				
		Rigula Estate				
		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 were one (1) Critical; one (1) Minor nonconformities and two (2) Opportunity For Improvement raised. The Sime Darby Plantation SOU 10 Bukit Puteri Palm Oil Mill & Supply Base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2186018-202204-M1	Issued Date	8/4/2022
Due Date	5/7/2022	Closure Date	5/7/2022
Indicator & Category (Critical / Minor)	2.1.1 (Critical)		
Statement of Nonconformity:	Bukit Puteri Palm Oil Mill has not established evidence of compliance to Regulation 5 of Environmental Quality (Clean Air) Regulations 2014 as sighted one unit Fume Hood at Laboratory and another unit in ETP Mini Laboratory not having Written Notification to Department of Environment.		
Requirement Reference:	The Unit of Certification complies with legal requirements.		
Objective Evidence:	<ul style="list-style-type: none"> No Written Notification to DOE under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014 for one unit of Fume Hood located in Laboratory of Bukit Puteri Palm Oil Mill. Sampled in ETP Mini Laboratory of Bukit Puteri Palm Oil Mill another unit of Fume Hood also not having Written Notification to DOE under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014. 		
Corrections:	Application of Written Notification to DOE under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014 by end of June 2022 through environmental consultants/vendors.		
Root Cause Analysis:	The recommendation from NRA report and water quality analysis report were missed out due to change of person in-charge of monitoring including legal compliance.		
Corrective Actions:	<ul style="list-style-type: none"> Appointment of consultant to complete the DOE submission Appointment of Site Safety & Sustainability Officer with job description revision November 2021 		
Assessment Conclusion:	Corrective action plan (CAP) has been accepted after 2 nd submission on 1/6/2022. Verification of documented CAP evidence submitted for remote verification on 5/7/2022 for both correction and corrective action were conducted off-site found the following: <ul style="list-style-type: none"> Purchase Order (PO) for appointment of consultant to complete the DOE submission dated 2/6/2022 Letter by consultant for application to DOE dated 30/6/2022 		

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

	<ul style="list-style-type: none"> Appointment of Site Safety & Sustainability Officer with job description to monitor compliance <p>Evidence of correction and corrective actions taken were verified and confirmed to be effective to address noncompliance. Hence, Major NC was closed on 5/7/2022.</p>
--	---

Non-conformity			
NCR Ref #	2186018-202204-N1	Issued Date	8/4/2022
Due Date	Next assessment	Closure Date	Next assessment
Indicator & Category (Critical / Minor)	3.3.3 (Minor)		
Statement of Nonconformity:	Records of monitoring and actions taken to address issues were insufficiently available.		
Requirement Reference:	Records of monitoring and any actions taken are maintained and available.		
Objective Evidence:	<ul style="list-style-type: none"> Records action taken to address Noise Risk Assessment issue recommendation insufficiently available. Noise Risk Assessment was received on 18/02/2022. The report states that the employer has to take action to control exposure within 30 days upon receiving the assessment report. As of to date the action plan and status of compliance has not been derived by the management. <ul style="list-style-type: none"> - Verified that there was no action plan for the Audiometric Test to be conducted as of yet. Records action taken to address Water Quality issue insufficiently available: Water Quality for Domestic use is monitored on a monthly basis at the mill. The Water Analysis Test Report (Test Report Number: IE251/2022), Sampled on 17/02/2022 and Report issued on 01/03/2022. As per the SOP, Sime Darby Plantation; Plantation Quality Management System; Sustainable Plantation Management System; SOP for Water Quality Monitoring; Date: 01/06/2016; 5.5 Evaluation of Laboratory Test Results, the mill is required to raise a Corrective/Preventive Action Report for Non-Conforming Water Analysis Results and the resampling has to be done within 7 days. The Mill has not raised a Corrective/Preventive Action Report for Non-Conforming Water Analysis Results and the resampling has not been done as of to date. 		
Corrections:	<ul style="list-style-type: none"> Estate has requested quotation for Audiometric Test from three (3) vendors i.e Specialist Mobile Safety Supplies Sdn. Bhd, Best Hearing Aid Centre and Clinic Sulaiman via email on 15/04/2022. Training for targeted employees who exposed to excessive noise is included in OSH training Matrix for FY 2022. Mill will prepare Corrective/Preventive Action Report for any Non-Conforming of latest Water Analysis Result expected to be received by month-end from R&D. Immediately carry out water resampling and send to the R&D for analysis within 7 days. 		
Root Cause Analysis:	The recommendation from NRA report and water quality analysis report were missed out due to change of person in-charge of monitoring.		
Corrective Actions:	The SOU 10 has appointed Site Safety and Sustainability Officer (SSSO) to monitor SOP and legal compliance for both estate and mill.		

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

Assessment Conclusion:	Corrective action plan (CAP) has been accepted after 2 nd submission on 1/6/2022. Verification of CAP evidence for both correction and corrective to be conducted during next assessment.
-------------------------------	--

Opportunity for Improvements	
OFI #	Description
2186018-202204-I1	3.3.2: Bukit Puteri Palm Oil Mill to make further arrangement by appointing registered DOE's Environmental Auditor for conducting second 3rd party audit of current DOE's License no. 004160 before 30/06/2022.
2186018-202204-I2	7.2.6: The pesticides wash room and Emergency Shower area, to be further upgraded as planned in CAPEX FY 2022 Bukit Puteri Estate to upgrade the facility of Chemical Pre-Mixing Area to improve mitigation of potential chemicals run off to drain and surrounding environment.

Positive Findings	
PF #	Description
PF 1	Good cooperation given throughout assessment period.
PF 2	Positive feedbacks received from external stakeholders.
PF 3	Good implementation of Integrated Management Plan.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2045335-202104-M1	Issued Date	16/4/2021
Due Date	15/7/2021	Closure Date	15/7/2021
Indicator & Category (Critical / Minor)	7.8.2 (Critical/Major)		
Statement of Nonconformity:	Riparian buffer zone was not effectively maintained.		
Requirement Reference:	Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.		
Objective Evidence:	Observed during site visit at P14C and P09B; The final row of OP was marked/demarcated at buffer/riparian zone area. Evidence of spray was sighted at the said area during visit. The last round of spraying was done on March 2021.		
Corrections:	i) Warning letter was issued to the Mandore and sprayers on 16/04/2021.		

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

	<ul style="list-style-type: none"> ii) To remove the contaminated soil and plant the bare area with mucuna or vetiver grass to recover those areas that were sprayed.
Root Cause Analysis:	<ul style="list-style-type: none"> i) HCV training is confine to management team and AP only without the inclusion of worker for HCV area. ii) Biodiversity management plan is not effective as the management has appointed a new person in-charge for managing the management plan with effect from January 2021
Corrective Actions:	<ul style="list-style-type: none"> i) To arrange for HCV training to all the workers and to create awareness in the protection of sensitive area such as river reserve. To revise training matrix with an inclusion of sprayer and manure for HCV training. ii) To clearly demarcated the area with signage of 'No Spraying' and marking of the last row of OP tree of the area permissible to be sprayed. iii) Appointment of person of in-charge and to brief PIC on the role and responsibility for biodiversity management
Assessment Conclusion:	<p>Remote Major NC close out verification:</p> <ul style="list-style-type: none"> i) Warning letter to mandore and sprayers was verified dated 16/4/21. This is as part of disciplinary action and reminder to the specific gang. ii) Based photographic evidence submitted, the affected areas is now grown with mucuna and yet to be planted with vetiver grass. iii) Evidence of training sighted for sprayer geng dated 16/4/21 by the estate's senior assistant. Interview with the mandore via phone call has confirmed the understanding of HCV area and riparian buffer zone protection. Annual training matrix has been revised an including the required training for spraying and manuring group. iv) Based on photographic evidence, clearly demarcation of the area with signage of 'No Spraying' and marking of the last row of OP tree of the area permissible to be sprayed was clearly evident at the previous affected area. v) PIC appointment for biodiversity management was verified. Training/coaching sessions by RSQM was carried out on 28/4/21 (peat and river management) and 5/5/21 (HCV management and data integration) for estate person in charge. <p>The implementation of action plan found to be sufficient to effectively close the major NC on 15/7/21. Continuous implementation will be further verified in the next assessment.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>ASA 2_1 verification:</p> <p>Bukit Puteri Estate has been protecting the water courses including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014).</p> <p>The on-site visit to the riparian zones and interview with workers among sprayers and manurers confirmed that no spraying and manuring conducted within riparian and buffer zones. The workers too demonstrated their understanding on the markings of riparian and buffer zones as an alert to avoid chemicals application within the area.</p>

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

	It is verified no recurrence of issue, hence Major NC remained closed.
--	--

Non-conformity			
NCR Ref #	2045335-202104-M2	Issued Date	16/4/2021
Due Date	15/7/2021	Closure Date	15/7/2021
Indicator & Category (Critical / Minor)	7.10.3 (Critical/Major)		
Statement of Nonconformity:	Identification of significant pollutants are not thoroughly identified and monitored.		
Requirement Reference:	Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.		
Objective Evidence:	<p>Based on document review for (EIA and EIE) and site observation;</p> <ul style="list-style-type: none"> i) Operation of steam boiler (EIA/2012/008-01) - Legal reference for air contaminant (particulate/soot/smoke) was not identified. Evaluation of EIA under (EIE/2011/208-2) reported as not significant. ii) EFB dumping activity was not risk assessed and documented under EIA. Evaluation of EIA available and reported in EIE/2012/0031-021. Weightage was reported not significant for normal, abnormal and emergency situation with no legal reference to the said activity. Emergency situation under fire, over dumping (abnormal) with leachate generation was not identified. iii) iii) Desludging activity and tertiary treatment plant EIA/EIE was not made available. 		
Corrections:	To revised EIA and EIE for steam boiler operation and EFB dumping and conduct assessment on the impact and aspect on environment for desludging activity and tertiary treatment plant		
Root Cause Analysis:	<ul style="list-style-type: none"> i) The management is not train to effectively identified and established a management plan for implementation and monitoring as EIA/EIE is not included in annual Training Matrix. ii) Review process of EIA/EIE is not comprehensive to capture changes in operation, processes and legal 		
Corrective Actions:	<ul style="list-style-type: none"> i) RSQM to arrange a training/coaching session to the person in-charge on the management plan establishment in end of end June 2021 ii) To revise annual training matrix by inserting training for EIA/EIE iii) To include review process of EIA/EIE as an agenda in EPMC quarterly meeting 		
Assessment Conclusion:	<p>Remote Major NC close out verification:</p> <ul style="list-style-type: none"> i) EIA/EIE has been revised dated 22/6/21 and included all related aspects and impacts for threshing, boiler and effluent treatment plant. RSQM training session was carried out on 5/5/21 to the person in charge on environmental and biodiversity matters. ii) Training matrix has been updated and included EIA/EIE training requirement on annual basis. 		

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

	<p>iii) Review process of EIA/EIE being monitored and discussed during quarterly Environmental Performance Monitoring Committee (EPMC). Refer to the latest EPMC meeting dated 12/7/21.</p> <p>The implementation of action plan found to be sufficient to effectively close the major NC on 15/7/21. Continuous implementation will be further verified in the next assessment.</p>
<p>Effectiveness Closure (for previous audit closed Critical NC):</p>	<p>ASA 2_1 verification:</p> <p>Sighted from Environmental Management Plan SOU 10 Period FY 2022 which link to maintain effectiveness of EAI/EIE. Plan to reduce and minimize covering usage of diesel for vehicles and transportation, pesticides for spraying activity, usage of water, waste disposal (domestic and schedule waste).</p> <p>In Bukit Puteri POM sighted Environmental Improvement Plan FY 2022. Among included:</p> <ul style="list-style-type: none"> • Water Pollution • Air Pollution • High Water Usage • High Boiler Fuel Consumption <p>Mitigation measures for each issues were clearly planned with PIC and time frame for completion in December 2022.</p> <p>It is verified no recurrence of issue, hence Major NC remained closed.</p>

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

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

	<p>i) HIRARC for the specific emergency response at effluent treatment plant has been updated in the register dated 9/6/21. Specific work instruction has been developed as part of risk control measure for the associated risk identified.</p> <p>ii) Review of HIRARC being monitored and discussed during OSH meeting to ensure any changes required will be captured in the register. Refer to meeting minute dated 20/4/21.</p> <p>The implementation of action plan found to be sufficient to effectively close the major NC on 15/7/21. Continuous implementation will be further verified in the next assessment.</p>
<p>Effectiveness Closure (for previous audit closed Critical NC):</p>	<p>ASA 2_1 verification:</p> <p>Bukit Puteri Estate has conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The assessment covers all main operations and support operations. Among the activities verified in the HIRARC included Manuring, Harvesting, Spraying, etc. HIRARC is reviewed on annually and as and when there are any accidents that occur in the estate.</p> <p>For Bukit Puteri POM, the risk assessment was guided by the documented procedure UM HSE Management System; OSH Risk Management Procedure; Doc Number: HSE/SP/01; Dated: 2021. HIRARC was available for all operations within the Mill to identify the hazards, assess and recommended control measures to minimize the risks. Among the HIRARC sampled were Effluent Treatment Plant, Kernel Station, Boiler Station and Processing. HIRARCs have been recently reviewed due to accidents that occur in regard to the related activity.</p> <p>Both Bukit Puteri POM and Bukit Puteri Estate established the Safety and Health Management Plan documented in Environment, Safety and Health Plan FY 2022. The management plan includes the ESH Risk Management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring and Health Monitoring.</p> <p>It is verified no recurrence of issue, hence Major NC remained closed.</p>

Non-conformity			
NCR Ref #	2045335-202104-M4	Issued Date	16/4/2021
Due Date	15/7/2021	Closure Date	15/7/2021
Indicator & Category (Critical / Minor)	6.7.3 (Critical/Major)		
Statement of Nonconformity:	Workers awareness and importance of PPE was not effectively demonstrated.		
Requirement Reference:	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
Objective Evidence:	<u>Bukit Puteri POM</u>		

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

	<p>During site, noted that the employee was not wearing ear plug when working at Kernel Plant and backhoe driver was not wearing safety helmet during working at FFB reception area.</p> <p><u>Bukit Puteri Estate</u></p> <p>During site visit, it was sighted 2 harvester riding motorbike and tractor driver not wearing safety helmet.</p>
Corrections:	To issue warning letter to the worker and the supervisor for failing to comply to company's SOP
Root Cause Analysis:	Seasonal enforcement for any incompliances amongst the worker on PPE usage from the estate
Corrective Actions:	<ul style="list-style-type: none"> i) Continuous enforcement by intensifying SIME card issuance to offender for any incompliances amongst the worker on PPE compliance. ii) Monthly reporting to management on SIME card issuance and report to be presented and discuss during OSH meeting
Assessment Conclusion:	<p>Remote Major NC close out verification:</p> <ul style="list-style-type: none"> i) Verified disciplinary measures by the management as part to reminder to workers on the importance of PPE compliance. Interview with the site safety coordinator has confirmed that more proactive measures will be intensified by using existing SIME card for monitoring and disciplining. ii) SIME card reporting recorded and summarized on monthly basis. Implementation for the month of May and June 2021 were sighted. <p>The implementation of action plan found to be sufficient to effectively close the major NC on 15/7/21. Continuous implementation will be further verified in the next assessment.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>ASA 2_1 verification:</p> <p>The mill has provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC and Pictorial Safety Standard (PSS) Palm Oil Mill dated 17/03/2008. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p> <p>PPE provided for free to all workers as per PPE issuance records sighted for Bukit Puteri Estate; PPE: Rubber Boot, Nitrile Glove, Cotton Glove, Mask 8210, Dupont Apron; Date: 16/3/2022 for sample Workers ID # 24118; ID # 107022; ID # 151075 & ID # 139074.</p> <p>It is verified no recurrence of issue, hence Major NC remained closed.</p>

Non-conformity			
NCR Ref #	2045335-202104-M5	Issued Date	16/4/2021
Due Date	15/7/2021	Closure Date	15/7/2021
Indicator & Category (Critical / Minor)	6.2.3 (Critical/Major)		
Statement of Nonconformity:	Compliance of industry requirements (MAPA/ NUPW) was not implemented effectively.		

Requirement Reference:	There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.
Objective Evidence:	Reviewed the Employee Allowances and Deduction Details of March 2021 in Bukit Puteri Oil Mill found 3 workers who is union member have made the deduction of wages for RM 11 for the union membership fees since they joined on 01/02/2019. There was no reimbursement of RM 3 made to the worker as per MAPA/NUPW Circular No. 22/2015 dated 4/8/2015. The sampled of workers as below: 1. Employee No.: 139076 2. Employee No.: 139299 3. Employee No.: 146950
Corrections:	To calculate and reimburse to the affected workers in the April salary.
Root Cause Analysis:	Monitoring of data input and verification process is not adequate.
Corrective Actions:	To add additional level of verification on data input to address and rectify an error immediately.
Assessment Conclusion:	Remote Major NC close out verification: i) Over deduction amount has been reimbursed in the month of April 2021 for all affected union members. Verified the correct deduction made in May 2021, RM 11 deducted and RM 3 reimbursed in the pay slip. ii) Input data for check roll has been checked by assistant manager and verified by the manager prior to payment. The implementation of action plan found to be sufficient to effectively close the major NC on 15/7/21. Continuous implementation will be further verified in the next assessment.
Effectiveness Closure (for previous audit closed Critical NC):	ASA 2_1 verification: Based on review of workers' sampled punch cards, employment contracts and payslips, evidence was available that Bukit Puteri Mill and its supply base were able to demonstrate compliance with Employment Act 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCSO, EPF, EIS) and non-statutory deductions (e.g. sports and recreation club, <i>surau</i> funds, electricity bills, union membership, etc) in accordance with the relevant laws and Labour Office permits. From the verification on estate and mill for 23 workers payslip in Bukit Puteri Estate and Bukit Puteri Mill showed that no recurrence issue regarding to reimbursement of RM 3 made to the worker as per MAPA/NUPW Circular No. 22/2015 dated 4/8/2015. As per sampling all workers that join NUPW have reimbursement of RM 3. It is verified no recurrence of issue, hence Major NC remained closed.

Non-conformity			
NCR Ref #	2045335-202104-N1	Issued Date	16/4/2021
Due Date	Next assessment	Closure Date	4/4/2022

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

Indicator & Category (Critical / Minor)	2.1.3 (Minor)
Statement of Nonconformity:	Demarcation of legal or authorised boundaries was not visibly maintained.
Requirement Reference:	i) Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. ii) Sime Darby Plantation EQMS, Section B7, Boundaries issue:1 dated 1/11/2008, clause 7.2 – Estate boundaries must be marked with iron pipes, planted along boundary lines and painted with red/white alternate rings
Objective Evidence:	Based on site observation at estate boundary with FELDA Sg Koyan (P98G) and Ladang Tanah Makmur Berhad (TMB) (P09B), no boundary marking visibly maintained along the boundary area.
Corrections:	To construct boundary marking as per SDP EQMS at the selected area and mark the area in boundary stone map for ease of monitoring.
Root Cause Analysis:	The management is not aware of requirement to have a clear boundary marking hence building a trenches along the boundaries is sufficient from the management perspective.
Corrective Actions:	To include boundary monitoring during field patrolling by AP and monthly maintenance schedule by the estate.
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.
Effectiveness Closure (for previous audit closed Critical NC):	ASA 2_1 verification: Bukit Puteri Estate has clearly demarcated and visibly maintained its legal perimeter boundary markers. Based on site visit at Block P18A and P14C, it was noted that trenching method was used to demarcate the boundary between the estate and FELDA Sg Koyan 2 Estate. The implementation of action plan found to be sufficient to effectively close the Minor NC on 4/4/2022. Continuous implementation will be further verified in the next assessment.

Non-conformity			
NCR Ref #	2045335-202104-N2	Issued Date	16/4/2021
Due Date	Next assessment	Closure Date	4/4/2022
Indicator & Category (Critical / Minor)	7.12.7 (Minor)		
Statement of Nonconformity:	Outcomes of the monitoring are not fed back into the management plan.		
Requirement Reference:	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.		
Objective Evidence:	Visual observation on site;		

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

	<p>i) Evidence of spraying at buffer zone demarcated area near Sg Telang (field P14C and P09B).</p> <p>ii) Construction of earth drain to mitigate flooding/stagnant water near buffer zone area.</p> <p>Results of monitoring i.e. pictorial (riverbanks), water analysis and patrolling records were not been considered in the review and establishment of the management plan.</p>
Corrections:	<p>i) To issue warning letter to the Mandore and sprayers on 19/04/2021.</p> <p>ii) To communicate with Conservation and Biodiversity Unit(CBU) of GSD on the rehabilitation process in the area during their visit to Bukit Puteri Estate</p>
Root Cause Analysis:	The management does not review the management plan effectively which does not include the result monitoring of HCV area.
Corrective Actions:	<p>i) Training on proper documentation of HCV monitoring by CBU on 27th April 2021</p> <p>ii) To review the management plan during management meeting and to monitor the implementation of action plan on quarterly basis</p>
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.
Effectiveness Closure (for previous audit closed Critical NC):	<p>ASA 2_1 verification:</p> <p>HCV area, on-going monitoring was done on monthly basis. HCV management plan documented under Biodiversity Management Plan as part of Environmental Management Plan SOU 10 FY 2022. Action planned for competency and awareness training on how to manage HCV at estate (Management Implementation) by PSQM annually. Sighted a book titled HCV Monitoring which data started on 04/03/21 till 03/04/22.</p> <p>The implementation of action plan found to be sufficient to effectively close the Minor NC on 4/4/2022. Continuous implementation will be further verified in the next assessment.</p>

Non-conformity			
NCR Ref #	2045335-202104-N3	Issued Date	16/4/2021
Due Date	Next assessment	Closure Date	4/4/2022
Indicator & Category (Critical / Minor)	7.11.3 (Minor)		
Statement of Nonconformity:	Engagement process with adjacent stakeholders on fire prevention and control measures was not effectively demonstrated.		
Requirement Reference:	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.		
Objective Evidence:	Based on the last stakeholder meeting minute dated 6/7/20, fire prevention and control measures presented to the stakeholders. Adjacent stakeholders (FELDA Sg Koyan, Kg Bertang, Ladang Tanah Makmur Berhad (TMB) and Kg Lubuk Kulit) were invited but none of them attended the meeting. Further verified with the estate assistant, no further engagement process being done for the adjacent stakeholders.		
Corrections:	i) The estate management to confirm on the attendance of the invited stakeholder.		

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

	ii) The stakeholder who was unable to attend the meeting will be given a copy of the minutes
Root Cause Analysis:	A mechanism to identify stakeholder adjacent to the operation is not sufficient.
Corrective Actions:	i) To include the agenda as per RSPO requirement in the stakeholder invitation letter ii) To diversify the platform to engage and communicate with the stakeholder on the fire prevention and control measure especially for the adjacent stakeholder. E.g. telephone call, e-mail etc.
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.
Effectiveness Closure (for previous audit closed Critical NC):	ASA 2_1 verification: Based on the last stakeholder meeting minute dated 29/03/22, fire prevention and control measures presented to the stakeholders. Adjacent stakeholders as attendance list that included Penghulu Mukim, Tok Empat Sg. Ular, LKPP Corporation. Sighted copy of the minutes dated 04/04/22 signed received by Ketua Balai Polis Ladang Tungku, Kampung Lubuk Kulit, Kampung Belitik, Kg Keledek. The implementation of action plan found to be sufficient to effectively close the Minor NC on 4/4/2022. Continuous implementation will be further verified in the next assessment.

Non-conformity											
NCR Ref #	2045335-202104-N4	Issued Date	16/4/2021								
Due Date	Next assessment	Closure Date	4/4/2022								
Indicator & Category (Critical / Minor)	2.2.2 (Minor)										
Statement of Nonconformity:	Due diligence of contractor was not available.										
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.										
Objective Evidence:	i) The FFB transporter (Ling San Wah) in Bukit Puteri Estate did not make the correct amount of SOCSO contribution according to Employees' Social Security Act 1969 (Act 4). <table border="1" style="margin-left: 20px; margin-top: 10px;"> <thead> <tr> <th>Passport No.</th> <th>Salary/ Month</th> <th>Amount of Contribution Made</th> <th>Actual Amount of Contribution</th> </tr> </thead> <tbody> <tr> <td>C0818487</td> <td>RM 2,308.94</td> <td>RM 28.10</td> <td>RM 29.40</td> </tr> </tbody> </table>			Passport No.	Salary/ Month	Amount of Contribution Made	Actual Amount of Contribution	C0818487	RM 2,308.94	RM 28.10	RM 29.40
Passport No.	Salary/ Month	Amount of Contribution Made	Actual Amount of Contribution								
C0818487	RM 2,308.94	RM 28.10	RM 29.40								
	ii) Reviewed the permit of the foreign workers found that the name of employer in the permit is not the employer of the workers have signed employment contract with. The sampled of permits as below: - Permit No.: PF 1736789 under employment with Muhibbah Progresif Sdn Bhd										

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

	<p>- Permit No.: PF 1837071 under employment with Syarikat Warasjaya Sdn Bhd</p> <p>iii) Besides, reviewed the payslips for January 2021 – March 2021 and FFB Despatch Record found that the workers have worked on rest day. However, no evidence to show that the workers have paid as per Employment Act 1955 for the work on rest day. Interviewed with the contractor confirmed that he only paid normal rate per piece for the work on rest day. Sampled of workers as below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Passport No.</th> <th style="width: 50%;">Date of Work on Rest Day</th> </tr> </thead> <tbody> <tr> <td>C 7126128</td> <td rowspan="3">17/01/2021, 24/01/2021, 14/02/2021, 14/03/2021 and 28/03/2021</td> </tr> <tr> <td>C 0818548</td> </tr> <tr> <td>C 0818487</td> </tr> </tbody> </table>	Passport No.	Date of Work on Rest Day	C 7126128	17/01/2021, 24/01/2021, 14/02/2021, 14/03/2021 and 28/03/2021	C 0818548	C 0818487
Passport No.	Date of Work on Rest Day						
C 7126128	17/01/2021, 24/01/2021, 14/02/2021, 14/03/2021 and 28/03/2021						
C 0818548							
C 0818487							
Corrections:	<p>i) To advised contractor to liaise with PERKESO on the SOCSO insufficient deduction.</p> <p>ii) Ling San Wah need to provide agreement on “temporary employment” from the stated company.</p> <p>iii) Brief Lin San Wah on the Employment Act 1955 about the work on rest day.</p>						
Root Cause Analysis:	The mechanism to conduct contractor’s due diligence is not being communicated to the management thoroughly						
Corrective Actions:	<p>i) To arrange for a training to contractor on the requirement to comply to the legal regulation such as Employment Act 1955 and Immigration Act 1959/63</p> <p>ii) To monitor contractor’s compliance on a quarterly basis by RSQM</p>						
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.						
Effectiveness Closure (for previous audit closed Critical NC):	<p>ASA 2_1 verification:</p> <p>Based on sample FFB Purchase Agreement between Bukit Puteri POM and OCP, all contracts signed between OCP and Bukit Puteri POM were attached with supplemental Vendor Integrity Pledge and COBC which include the specific clauses on meeting applicable legal requirements sighted for sample as following:</p> <ul style="list-style-type: none"> - Nor Azlan Bin Kasmani; Agreement # P/C/1221/FFB03307L; MPOB License # 617406015000; Expired date: 31/5/2022 - Pertiwi Palms Sdn. Bhd.; Agreement # P/C/1221/FFB03309L; MPOB License # 535662115000; Expired date: 31/1/2023 - MXF Gemilang Enterprise; Agreement # P/C/1221/FFB03313L; MPOB License # 618974002000; Expired date: 31/1/2023 - Tee Chin Keong; Agreement # P/C/1221/FFB03310L; MPOB License # 816411001022; Expired date: 31/5/2025 <p>The implementation of action plan found to be sufficient to effectively close the Minor NC on 4/4/2022. Continuous implementation will be further verified in the next assessment.</p>						

Opportunity for Improvement	
OFI#	Description

OFI 1	<p>OFI Statement:</p> <p>7.12.6 – A programme to regularly educate the workforce about the status of RTE species to be put in place. Information related to RTE and disciplinary measures in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species to be included in the programme for improvement</p> <p>Verification / Follow-up actions:</p> <p>A programme to regularly educate the workforce about the status of RTE species is in place. Sighted Training Programme titled HCV Briefing to AP and Workers conducted on 26/02/22 as part of improvement to all Aps and Checkroll workers. Evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities were maintained and implemented. Signage was utilised as part of creating awareness among employees on the restriction of poaching/capturing/harming/collecting/killing the RTE species.</p>
OFI 2	<p>OFI Statement:</p> <p>2.1.2 – A documented system to ensure compliance to be consistently updated. Mill is currently running with CL (contravene of license) for section 14 under air pollution management. Changes to the license condition has yet to be complied if the CL is still required for operation.</p> <p>Verification / Follow-up actions:</p> <p>SOU10 had documented the Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment. Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4a: Procedure for Legal and Other Requirements dated 1/11/2008.</p> <p>Tracking of changes is by Sime Darby Plantation Berhad Group Sustainability & Quality Management (GSQM) team disseminated to all SOUs. For Bukit Puteri Estate, latest evaluation of compliance and review was done on 31/1/2022. Noted that Minimum Wages Order 2020 and Prevention and Control of Infectious Disease Act 1988 (Act 342) has been updated in the register.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2020.01	Major	6.2.2	19/9/2020	2/10/2020
2045335-202104-M1	Major	7.8.2	16/4/2021	Closed out on 15/7/2021
2045335-202104-M2	Major	7.10.3	16/4/2021	Closed out on 15/7/2021
2045335-202104-M3	Major	3.6.1	16/4/2021	Closed out on 15/7/2021
2045335-202104-M4	Major	6.7.3	16/4/2021	Closed out on 15/7/2021
2045335-202104-M5	Major	6.2.3	16/4/2021	Closed out on 15/7/2021
2045335-202104-N1	Minor	2.1.3	16/4/2021	Closed out on 4/4/2022
2045335-202104-N2	Minor	7.12.7	16/4/2021	Closed out on 4/4/2022
2045335-202104-N3	Minor	7.11.3	16/4/2021	Closed out on 4/4/2022
2045335-202104-N4	Minor	2.2.2	16/4/2021	Closed out on 4/4/2022
2186018-202204-M1	Critical/ Major	2.1.1	8/4/2022	Closed out on 5/7/2022

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

2186018-202204-N1	Minor	3.3.3	8/4/2022	Open
-------------------	-------	-------	----------	------

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Sime Darby Plantation Berhad SOU 10 Bukit Puteri Palm Oil Mill and Supply Base Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

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)
Local school representative	SK Kg. Keledok Headmaster	Face to face interview
Local community representatives	Kg. Keledok Representatives	Face to face interview
OCP suppliers representatives	- Noor Azlan bin Kasmani - Atil Mela Enterprise MXF - Gemilang Enterprise	Face to face interview
Vendor (contractor/supplier) representatives	- Mahu Berjaya Enterprise - Tee Chin Keong	Face to face interview
Gender committee representatives	- Bukit Puteri POM representative - Bukit Puteri Estate representative	Face to face interview
Workers union (NUPW) representatives	- Bukit Puteri POM representative - Bukit Puteri Estate representative	Face to face interview
Foreign workers representatives	- Bukit Puteri POM representative - Bukit Puteri Estate representative	Face to face interview

Stakeholders comment	
1	<p>Feedbacks: OCP Suppliers</p> <p>They agreed and understand the requirement from Sime Darby on FFB quality send to the mill. The mill continuously communicates with the OCP suppliers on any issue regarding FFB quality. The payment was always made on time as per payment terms stated in the contracts.</p>

	<p>Audit Team verification and response: Reviewed the due diligence reports, contract agreements, VCOBC and Vendor Integrity Pledges signed and understand by the contractors.</p>
2	<p>Feedbacks: NUPW Representative They informed that they were elected by the workers through election. They have meeting with the management to discuss any issues related to workers. All the issues reported were taken action by the management and resolved accordingly. The estate and mill conducted Social Dialogue Meeting biweekly. The workers were can discuss with the management on any work related and social issue with the management freely.</p> <p>Audit Team verification and response: Reviewed the NUPW minutes meeting, Social Dialogue Tracking report and SIA management plan.</p>
3	<p>Feedbacks: Female Workers (Gender Committee) They informed that the management treated the female workers equally with male workers. No discrimination occurred. The female workers were given opportunity on promotion of work based on work performance and capability. They also informed that no case of sexual harassment and domestic violence reported. They are aware on the reporting channel if any case of sexual harassment and domestic violence occur in the estate or mill</p> <p>Audit Team verification and response: Reviewed the payslips, employment contracts and records of meeting minutes of Gender Committee confirmed that no discrimination and sexual harassment reported.</p>
4	<p>Feedbacks: Foreign Workers Representative (Estate) They informed that the management treated everyone equally without discrimination. Their wages are paid accordance to Employment Act 1955 and Minimum Wage Order 2020. They have the rights to join any association. The estate conducted Social Dialogue Meeting biweekly. The workers were can discuss with the management on any work related and social issue with the management freely. The workers were aware on the complaints and grievances channel.</p> <p>Audit Team verification and response: Reviewed the payslips for all sampled workers found all the workers were paid as per the legal requirements.</p>
5	<p>Feedbacks: SK Kg. Keledak They informed that there was no child labour employed by Bukit Puteri Estate and Bukit Puteri POM as the students were attended school as per school terms. They understand the complaint procedure and so far, there is not any complaint reported. The estate and mill continuously provided any helps or contribution to the school when applied. The parents always give full support and commitment in any school activities. No negative impact sighted for the activities carried out by the mill and estate.</p> <p>Audit Team verification and response: Reviewed complaint records found no issue reported by the school teachers.</p>
6	<p>Feedbacks: Contractors They informed that they have signed contract agreement with Sime Darby prior to provide services. The terms and conditions have clearly stated in the agreement included the payment term. The payment was made promptly. They also have been briefed on the VCOBC and Integrity Pledges prior to the contract signing. Sime Darby continuously conducted due diligence monitoring to the contractors.</p> <p>Audit Team verification and response:</p>

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

	Reviewed the due diligence reports, contract agreements, VCOBC and Vendor Integrity Pledges signed and understand by the contractors.
--	---

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not applicable as the estate already underwent two cycles of replanting	N/A	N/A	N/A	N/A	N/A

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

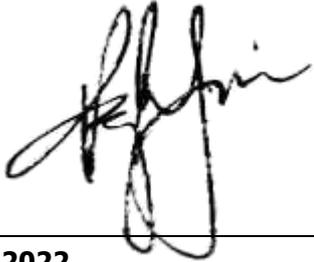
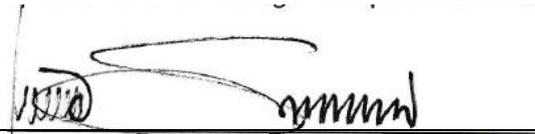
3.5 Impartiality and conflict of interest

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

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

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Sime Darby Plantation SOU 10 Bukit Puteri Palm Oil Mill and Supply Base 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 Sime Darby Plantation SOU 10 Bukit Puteri Palm Oil Mill and Supply Base is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Hafriazhar Mohd. Mokhtar	Name: Mohd. Safwan
Company Name: BSI Services Malaysia Sdn. Bhd.	Company Name: Sime Darby Plantation Berhad
Title: Lead Auditor	Title: Estate Manager
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 29/8/2022	Date: 23/9/2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Publicly available management documents such as land titles, OHS plans, EIA and SIA reports, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans are available. All operating units have individual documents and records to demonstrate compliance to this indicator. Sustainability Reports, policies and procedures are also accessible through the company’s website: http://www.simedarbyplantation.com/.</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>All the related information was in Bahasa Malaysia and English and accessible to the stakeholders upon request.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>The mill and estate have maintained the DOSH inspection logbook, visitor logbook, DOE logbook and complaint book to record any requests and responses from the stakeholders. Sample records seen as following:</p> <ul style="list-style-type: none"> - Bukit Puteri POM records of DOE Pahang inspection logbook indicated latest inspection conducted on 22/9/2021 to assess the effluent treatment plant progress. General request made by DOE has been addressed by the mill management - Bukit Puteri Estate latest DOSH visit was on 25/1/22. Records of inspection was maintained in the logbook. DOSH Pahang 	Complied

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

		<p>Machinery Re-Inspection; Machine: Air Receiver Tank; Reg. # PH PMT 81559; Date: 25/1/2022. General request made by DOSH has been addressed by the estate management</p>	
<p>1.1.4</p>	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -</p>	<p>Sime Darby Plantation Estate Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 1, issue date 1/4/2008). The procedure has detailing the process of handling complaints from stakeholders and the time. For Complaint/Feedback Form by external stakeholders, action taken by the management was acknowledged by the complainant to be resolved within agreed timeframe.</p> <p>Sime Darby have established system to handled issue regarding to social as per below;-</p> <p>a) <u>Social dialogue tool kit</u> This session is about management and workers engagement between representative of workers, and employer (operating unit management) to resolve workplace and living condition issues through social dialogue. This dialogue frequency will handle every 2 weeks once. The issue that been raised during this dialogue will be recorded under tracker. This tracker will be captured in the dashboard and available to RGM, RCEO, ILO WG. This system rolls out on 22/12/2021 (Phase 3 & Phase 4) to operating unit. From the verification the latest record was on 4/3/2022 and previously was on 28/2/2022.</p> <p>b) <u>Oil Palm Pal (OPP)</u> Establish and start been using on 4/12/2021 in SOU Bukit Puteri. This OPP was a digitalized data management to capture all complaint/request for repair of workers houses and monitor progress of repair works to completion. The latest record of OPP in Bukit Puteri estate was on 29/3/2022 regarding to door of</p>	<p>Complied</p>

		<p>their house was need repair. The issue raised on 29/3/2022 and solved on 30/3/2022. From the previous record no issue was solved more than 3 days.</p> <p>Enhancement from the above there also 3 type of grievance or complaint can be made by stakeholder and this 3 channel handle by outsider or 3rd Party. The 3 channel was:-</p> <ul style="list-style-type: none"> - ULULA - Suara Kami - Whistle blowing 	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>Stakeholder list FY 2022 was established in both mill and estate. Stakeholder such as local communities, authorities, contractors, suppliers, FFB suppliers and NGOs were included in the list. Nominated representative with contact number and address was sighted.</p> <p>This stakeholder was updated by Mohammad Aiman Aqem Bin Azizan (Social Representative). This been nominated by management dated 1/1/2022 as per appointment letter.</p>	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has developed and implemented Code of Business Conduct (Aug 2020) where the company implemented the integrity, respect & responsibility, enterprise and excellence during any business process. The policy was developed in Bahasa Malaysia, English and Bahasa Indonesia which can be downloaded via https://www.simedarbyplantation.com/corporate/ethical-businesspractices. A Vendor Code of Business Conduct Briefing for stakeholders from Central East Region organized by Group Procurement together with Group Compliance on 26/03/2021 through Microsoft Teams. Seen the list of participants that accepted the invitation.</p>	Complied

1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has implemented Whistleblowing Policy to help all stakeholders raise concerns, without fear of retaliation on any wrongdoing that they may observe in Sime Darby Plantation Group. The channels of whistleblowing are such as E-form that could be downloaded via https://www.simedarbyplantation.com/corporate/whistleblowing or through email, call or write letter to the Whistleblowing unit in Head Office. Besides, the company established Internal Audit to monitor the compliance and implementation of the policy throughout the plantations. Internal audit was carried out on 3/03/2022 in Bukit Puteri Oil Mill and 4/03/2022 in Bukit Puteri Estate. Sampled the contractors and vendors signed on Vendor Integrity Pledge:</p> <p>Mahu Berjaya Enterprise (Registration: CA0064653H) dated 22/1/2022. This LOA (Letter of Awards) was valid until 31/12/2023.</p>	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> <p>- Critical (Major) compliance -</p>	<p>SOU 10 demonstrated compliance with legal requirements through maintenance of applicable permit and licenses hold by individual operating unit as per samples sighted.</p> <p>Bukit Puteri Estate:</p> <ul style="list-style-type: none"> - MPOB License # 524186002000; Licensed Activity: Sales and transport; Oil Palm Product: FFB#; Validity period: 1/11/2021 – 31/10/2022; Estate area: 3,875.8 ha - MPOB License # 533567011000; Licensed Activity: Production; Sales and transport; Storage; Oil Palm Product: SLGBIJI#; Validity period: 1/11/2021 – 31/10/2022 - Scheduled Controlled Goods Permit; Serial # C000539; Ref. # KPDNHEP.PHG.RUB.600-5/4/063; Type & Description of 	Non-compliance
-------	---	--	----------------

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

		<p>Controlled Goods: Diesel – By Licensed Suppliers; Storage quantity: 16,380 litres; Validity period: 25/5/2021 - 24/5/2022</p> <ul style="list-style-type: none"> - Certificate of Fitness: Unfired Pressure Vessel; Description: Air Receiver Tank; Reg. # PH PMT 81559; Validity period: 25/1/2022 – 24/4/2023 <p>Bukit Puteri POM:</p> <ul style="list-style-type: none"> - MPOB License # 536632004000; Licensed Activity: Sales and transport; Purchase and transport; Storage; Milling; Oil Palm Product: PK, CPO, SPO# & FFB#; Validity period: 1/3/2022 – 28/2/2023; Allowed processing rate: 120,000 mt FFB/yr - DOE license # 004160; Ref. # JAS.CHQ 600-3/1/2/32(34); Validity period: 1/7/2021 – 30/6/2022; Max processing capacity: 20 mt/hr - Pahang Water and Energy Resources Sdn. Bhd. Water Resource Consumption Certificate; Serial # 0066; Account # 0721010002; Intake point: Sg. Sertang; District & Sub-district: Batu Yon, Lipis; Water Source Type: Surface Water; Registered date: 1/1/2020; Certificate validity: 1/1/2022 – 31/12/2022 - Certificate of Fitness: Boiler; Description: Boiler; Reg. # PMD-P/21 45435; Validity period: 20/9/2021 – 19/12/2022 <p>However, it was found the following:</p> <ul style="list-style-type: none"> - No Written Notification to DOE under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014 for one unit of Fume Hood located in Laboratory of Bukit Puteri Palm Oil Mill. - Sampled in ETP Mini Laboratory of Bukit Puteri Palm Oil Mill another unit of Fume Hood also not having Written Notification to DOE under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014. <p>Hence, a Major NC has been raised on the matter.</p>	
--	--	--	--

2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>SOU10 had documented the Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment. Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4a: Procedure for Legal and Other Requirements dated 1/11/2008.</p> <p>Tracking of changes is by Sime Darby Plantation Berhad Group Sustainability & Quality Management (GSQM) team disseminated to all SOUs. For Bukit Puteri Estate, latest evaluation of compliance and review was done on 31/1/2022. Noted that Minimum Wages Order 2020 and Prevention and Control of Infectious Disease Act 1988 (Act 342) has been updated in 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>Bukit Puteri Estate has clearly demarcated and visibly maintained its legal perimeter boundary markers. Based on site visit at Block P18A and P14C, it was noted that trenching method was used to demarcate the boundary between the estate and FELDA Sg Koyan 2 Estate.</p>	Complied
<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>A list of contracted parties is well maintained that includes all vendors among contractors and suppliers. As example, Bukit Puteri POM maintained the list for its purchased FFB from nine Outside Crop Providers (OCP) as following:</p> <ul style="list-style-type: none"> - Green Agro Pyramid Business Trading - CK Teik Enterprise Sdn Bhd - Nor Azlan Bin Kasmani - Pertiwi Palms Sdn. Bhd. - MXF Gemilang Enterprise 	Complied

		<ul style="list-style-type: none"> - Tee Ching Keong - Tee Chin Hock & Tan Lian Bee - Agarwal Oil Palm Plantations Sdn. Bhd. - Atil Mela Enterprise 	
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> <ul style="list-style-type: none"> - Minor compliance - 	<p>Based on sample FFB Purchase Agreement between Bukit Puteri POM and OCP, all contracts signed between OCP and Bukit Puteri POM were attached with supplemental Vendor Integrity Pledge and COBC which include the specific clauses on meeting applicable legal requirements sighted for sample as following:</p> <ul style="list-style-type: none"> - Nor Azlan Bin Kasmani; Agreement # P/C/1221/FFB03307L; MPOB License # 617406015000; Expired date: 31/5/2022 - Pertiwi Palms Sdn. Bhd.; Agreement # P/C/1221/FFB03309L; MPOB License # 535662115000; Expired date: 31/1/2023 - MXF Gemilang Enterprise; Agreement # P/C/1221/FFB03313L; MPOB License # 618974002000; Expired date: 31/1/2023 - Tee Chin Keong; Agreement # P/C/1221/FFB03310L; MPOB License # 816411001022; Expired date: 31/5/2025 	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> <ul style="list-style-type: none"> - Minor compliance - 	<p>Based on sample FFB Purchase Agreement between Bukit Puteri POM and OCP, all contracts signed between OCP and Bukit Puteri POM were attached with supplemental Vendor Integrity Pledge and COBC which include the specific clauses on disallowing child, forced and trafficked labour requirements sighted for sample as following:</p> <ul style="list-style-type: none"> - Nor Azlan Bin Kasmani; Agreement # P/C/1221/FFB03307L; MPOB License # 617406015000; Expired date: 31/5/2022 - Pertiwi Palms Sdn. Bhd.; Agreement # P/C/1221/FFB03309L; MPOB License # 535662115000; Expired date: 31/1/2023 - MXF Gemilang Enterprise; Agreement # P/C/1221/FFB03313L; MPOB License # 618974002000; Expired date: 31/1/2023 	Complied

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

		- Tee Chin Keong; Agreement # P/C/1221/FFB03310L; MPOB License # 816411001022; Expired date: 31/5/2025	
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>Other than Bukit Puteri Estate and group estates' diverted crops from other certification units, directly sourced FFB among OCP for Bukit Puteri POM are per sample as following:</p> <ul style="list-style-type: none"> - Agarwal Oil Palm Plantations Sdn. Bhd.; MPOB License # 502530602000; GPS: N 4.2246301, E101.903169; Ownership: Land Title # 8897; District: Lipis; Sub-district: Mukim Batu Yon; Lot # 850; Area: 159.2435 ha; Register date: 21/8/1998 <p>Relevant information on geo-location, evidence of land ownership and supporting documents for claim maintained by the mill with assistance from Sime Darby Plantation Global Trading and Marketing (GTM) Department.</p>	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 Indicator2.3.1.</p> <p>- Minor compliance -</p>	<p>Indirectly sourced FFB among OCP for Bukit Puteri POM are as per sample as following:</p> <ul style="list-style-type: none"> - MXF Gemilang Enterprise; MPOB License # 618974002000; GPS: N 4.289181, E101.856635; Ownership: <i>Majlis Pengurusan Komuniti Kampung Orang Asli (MPPKOA)</i> Letter ref. # JAKOA.B1.95/743 Jld20(9); Date: 19/12/2019 <p>Relevant information on geo-location, evidence of land ownership and supporting documents for claim maintained by the mill with assistance from Sime Darby Plantation Global Trading and Marketing (GTM) Department.</p>	Complied
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			

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>As part of commitment to long term sustainability and improvements, SOU 10 has established an Annual Budget with forecasted 5 years business plan from FY 2021 – 2025. Annual business plan for estate in the form of annual budget and the projection for 5 years prepared as guidance for future planning. In the 5 years business plan include items as follows:</p> <ul style="list-style-type: none"> • Estate Annual cost (operation and admin expenses) • Crop status (Mature & Immature) with expenses allocation. • Crop projections. • Labor cost • Road and bridges cost, • Nursery <p>In Bukit Puteri POM available as requested a Business Plan (Total Mill Cost Report) FY 2022 for 3 Years (2022-2026)</p> <ul style="list-style-type: none"> • Incoming crop (group and outside) • Production of CPO • Production of PK • Total Palm Oil Extraction • Total Palm Kernel Extraction. • Mill Cost (Expenses) with Total Fixed Cost. <p>No scheme smallholder involved.</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>In SOU 10 a long range replanting program from FY2022 until FY 2026. Replanting planned for the palm older than 25 years, Sighted replanting program for the next financial year as follows:</p> <table border="1" data-bbox="1128 1286 1939 1364"> <thead> <tr> <th>Field</th> <th>Replanting</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>2021A</td> <td>2021</td> <td>88.38</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Field	Replanting	2021	2022	2023	2024	2025	2026	2021A	2021	88.38						Complied
Field	Replanting	2021	2022	2023	2024	2025	2026												
2021A	2021	88.38																	

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

		2022A	2022		105.88					
		2023A	2023			92.97				
		2023B	2023			88.50				
		2023C	2023			73.63				
		2024A	2024				94.22			
		2024B	2024				108.02			
		2025A	2025					99.01		
		2025B	2025					104.50		
		2026A	2026						99.92	
		2026B	2026							85.25
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>SOU 10 Bukit Puteri has conducted a Management Review was conducted on 17/02/22 at Meeting Room of Bukit Puteri Estate. Attended by 2 Sr. Assistants, Assistant, SSSO, Checkroll Clerk, Trainee and 5 Field Staff. However the Sr. Manager's name was found missing. Among discussed included findings of internal audits, corrective action status, follow up from previous management review, changes that could affect management system, recommendation for improvement and resources needs.</p> <p>In Bukit Puteri POM a Management Review Meeting was conducted on 22/03/22 at Meeting Room the mill. Attended by 9 employees and staff that included Mill Manager, 4 Assistant Engineer, SSSO, Process Supervisor and Lab Supervisor. The agenda of discussion included:</p> <ul style="list-style-type: none"> • Finding of internal audit and status of corrective action taken. • Customer feedback. • Process performance and product conformity. 								Complied

		<ul style="list-style-type: none"> • Status of Preventive and corrective action. • Follow up from previous management review. • Changes that could affect the management system. • Recommendation for approval. • Complaint and grievances. • Improvement for management system and process. • Resources needed. 	
<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.</p> <p>- Critical (Major) compliance -</p>	<p>SOU10 has established Management Plan for Social Impact Assessment for Period 2022. Sighted the sampled plan/projects at visited as follows:</p> <p>Lack of understanding on Working Condition which action to continuously brief workers on subject matters.</p> <p>Housing condition with poor maintenance which action to regularly conduct maintenance.</p> <p>SOU 10 has also established Environmental Management Plan for Period of 2022.</p> <p>Waste Management</p> <p>Recycleable waste of waste such as empty pesticides container and reuse of empty containers.</p> <p>Water Management</p> <p>Rain water harvesting to be used for general cleaning, gardening and operation.</p> <p>Waste water in pre-mix area in sump collected and reuse back for pre-mixing.</p>	<p>Complied</p>

		In Bukit Puteri POM, sighted Environmental Improvement Plan FY 2022. Among included: <ul style="list-style-type: none"> • Water Pollution • Air Pollution • High Water Usage • High Boiler Fuel Consumption 	
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. 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. - Minor Compliance -</p>	RSPO metrics template submitted was verified its data to be consistent and reflective of raw data sources for both Bukit Puteri POM and Bukit Puteri Estate.	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. - Critical (Major) compliance -</p>	<p>SOP was established for the Estates. Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units under SOU8 as a guidance document to conduct estate operation. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc.</p> <p>Available and documented in Bukit Puteri POM SOP for Palm Oil Mills (SDP/SOP/01) dated 01/01/19, Ver. 02 and approved by Head of Plantation, Upstream Malaysia. Among operations included:</p>	Complied

		<ul style="list-style-type: none"> • Reception Station • Fruits Handling Station • Sterilisation Station • Threshing Station • Pressong Station • Clarification Station • Depericarping Station • Kernel Recovery Station • Boiler Station • Power Generation • Product Storage and Despatch • Oil Recovery Station • Water Treatment Plant • Effluent Treatment Plant • EFB Disposal Station. 	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p>	<p>In ensuring consistency of implementation in operation, Sime Darby Plantation has established mechanism to monitor the implementation of their procedure by Mill advisor/ Plantation Advisor Visit, Structured Oil Recovery Assessment (SORA) and Planning and Monitoring Unit, Performance Monitoring Visit and Agronomist Visit. The visit focusing on Yield Improvement, Crop Recovery, Replanting and Immature Palms Maintenance and Mature Upkeep on all aspect of operations in the mill and estates. Sighted 2021/2022 Agronomic & Fertilizer Recommendation Report-Oil Palm (Bukit Puteri). Furthermore, Bukit Puteri Palm Oil Mill to make further arrangement by appointing registered DOE's Environmental Auditor for conducting second 3rd party audit of</p>	OFI

		current DOE’s License no. 004160 before 30/06/2022. Hence, an OFI has been raised on the matter.	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	<p>Bukit Puteri Estate has conducted Monthly Management Meeting to discuss operation and performance matters. At Regional level a quarterly meeting conducted to discuss operation and estate performance as in Minutes of Central East Region Management Committee Meeting (CERMCM) conducted 07/04/21, 22/07/21. Among monitoring and performance discussed included:</p> <ul style="list-style-type: none"> • Finance performance • Zenoah Efficiency • 5S Implementation • Safety and Health • Human Resources • P&P Update-Rat Damage & Control • Crop Performance <p>Sighted in Performance Monitoring Visit Summary by Performance Monitoring Unit (PMU) 6-7 January 2022. Among performance monitored included:</p> <ul style="list-style-type: none"> • Upkeep and Mature Area • Structured Crop Recovery Assessment (SCRA) • OP Immature • OP Nursery • Manuring • Building and Facilities Management. • Engine Vehicle Implement Trailer (EVIT) • Ex-Estate Cost 	Non-compliance

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

		<p>Environmental compliance audit by DOE license auditor under Green Orbis Environmental Sdn Bhd dated December 2021. Previously it was conducted in November 2020 by the same auditor. Results from Environmental Compliance Audit Report (1/2021) no noncompliance issue and only Three (3) Area for Improvement raised by auditor.</p> <p>Structured Oil Recovery Assessment (SORA) SOU 10 Bukit Puteri POM (06-10/12/21). As in Executive Summary stated, Overall performance were satisfactory but mill to focus more on oil losses at empty bunches, press cake fibre and raw effluent. Compliance score 75.85%.</p> <p>However it was found the following:</p> <ul style="list-style-type: none"> Records action taken to address Noise Risk Assessment issue recommendation insufficiently available. Noise Risk Assessment was received on 18/02/2022. The report states that the employer has to take action to control exposure within 30 days upon receiving the assessment report. As of to date the action plan and status of compliance has not been derived by the management. <ul style="list-style-type: none"> - Verified that there was no action plan for the Audiometric Test to be conducted as of yet. Records action taken to address Water Quality issue insufficiently available: <p>Water Quality for Domestic use is monitored on a monthly basis at the mill. The Water Analysis Test Report (Test Report Number: IE251/2022), Sampled on 17/02/2022 and Report issued on 01/03/2022. As per the SOP, Sime Darby Plantation; Plantation Quality Management System; Sustainable Plantation Management System; SOP for Water Quality Monitoring; Date: 01/06/2016; 5.5 Evaluation of Laboratory Test Results, the mill</p> 	
--	--	---	--

		<p>is required to raise a Corrective/Preventive Action Report for Non-Conforming Water Analysis Results and the resampling has to be done within 7 days. The Mill has not raised a Corrective/Preventive Action Report for Non-Conforming Water Analysis Results and the resampling has not been done as of to date.</p> <p>Hence, a Minor NC has been raised on the matter.</p>	
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There was no new planting reported in Bukit Puteri Estate. SIA was conducted on 17 – 18/09/2015 for SOU 10 Bukit Puteri POM and Bukit Puteri Estate by Social & Environment Projects Unit, PSQM Department. The methodology of the assessment was through field interview with stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, officers from government authorities and internal workers. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community, education, safety and health, living condition, infrastructure and amenities and stakeholder engagement were assessed accordingly.</p> <p>In Bukit Puteri POM, Environmental Impact Evaluation (EIE) review process was conducted for FY 2022 for Threshing Station, Boiler Station and Effluent Treatment Plant on 22/06/21.</p>	<p>Complied</p>
<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>SOU 10 has established Environmental Management Plan and was made available in the estates/mill for review. Internal stakeholders (estate and mill team) were consulted for during review process especially for those interact directly with the activities at estate’s and mill’s workstation with assistance by Social & Environment</p>	<p>Complied</p>

		<p>Projects Unit, PSQM Department. The methodology of the assessment was through field interview with stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, officers from government authorities and internal workers. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community, education, safety and health, living condition, infrastructure and amenities and stakeholder engagement were assessed accordingly.</p>	
<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>The management plan implementation sighted latest stakeholders' consultation meeting was conducted together with Bukit Puteri POM on 29/03/2021. The meeting was attended by local authorities, local community representatives, neighbors, vendors and FFB suppliers. Additionally, the estate has conducted a meeting with cattle ranchers on 18/01/2022.</p> <p>For internal stakeholders, the mill conducted the Social Dialogue on Weekly Basis. Reviewed the Social Dialogue Action Tracker for Social Dialogue dated 24/02/2022, 09/02/2022, 26/01/2022, 19/01/2022 and 03/01/2022.</p> <p>Reviewed the implementation of the latest updated management plan dated 24/02/2022 as follows:</p> <ol style="list-style-type: none"> 1. Base on feedbacks in Social Dialogue, the workers request for salary increment from RM 1100 to RM 1200. The management informed the workers that the salary was based on Minimum Wages Act 2020. However, from March 2022, SDPB agreed to standardize all minimum salary for all operating units to RM 1200. The estate has conducted briefing on the salary increment on 20/02/2022. 	<p>Complied</p>

		<p>2. Base on feedbacks in Social Dialogue, the workers request for increment of advance rate from RM 150 to RM 300. The management have agreed with the request and started from February 2022; the advance rate was at RM 300. Briefing on the increment of advance rate has been conducted on 20/02/2022.</p> <p>3. The estate continuously conducted training to the workers on how to read the details in pay slips. Latest training was conducted on 19/02/2022.</p> <p>Base on feedbacks in Social Dialogue, the workers request to work on rest day. The management has brief the workers on 19/02/2022 that the work on rest day will be offered if there is any work available.</p> <p>For Environmental impacts, the management plan established base on operation with significant impact to the environment. The management plan was reviewed annually.</p> <p>Sighted In Bukit Puteri POM, The Environmental Management SOU 10 Period of 2022 stated the environmental issue, mitigation actions, monitoring plan and person responsible for monitoring implementation. The implementation action included:</p> <ul style="list-style-type: none"> • Disposal Industrial Waste (Scrap metal) • Waste utilisation (recyclable) EFB and POME. • Water quality monitoring at river/stream • Boiler smoke density reading operate below R/chart 2. 	
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.	The Human Resource Department in HQ has established Hiring of Local Workers procedure (Doc. No.: 01-12-19) dated 01/12/2019 and Workforce Management Unit Liaison & Recruitment procedure (WMU/LR-SOPP/MARCH2016, Rev. 0 dated 30/03/2016) to explain	Complied

	- Minor Compliance -	the recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried out by the HQ through appointed agents in respective countries.	
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Application form, employment interview assessment form, medical check-up report and employment contract was sighted for new recruited employees. The latest recruitment of workers in Bukit Puteri Oil Mill was on 11/2/2022. A copied of identification card was kept as record. Interviewed with the clerk confirmed that if there is any job vacancy available, they will publish a job vacancy advertisement at the places nearby the villages. Seen the job vacancy notice for Mill Operator, harvester, and others. The personal file and employment contracts for new workers was sighted.	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. - Critical (Major) compliance -	Sime Darby Plantation Berhad have established the Group Policy on Health, Safety & Environment (HSE) Policy Statement signed by the CEO on 1/6/2020. The policy has been communicated to the staffs and workers through induction training for new workers, morning briefing and displayed at various notice boards within the estate. Risk assessments are based on the established Standard Operating Procedure for Risk Assessment and documented in EQMS/SOM subsection 5.4, Appendix 5.4.1a. Bukit Puteri Estate has conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The assessment covers all main operations and support operations. Among the activities verified in the HIRARC included Manuring, Harvesting, Spraying, etc. HIRARC is reviewed on annually and as and when there are any accidents that occur in the estate.	Complied

		<p>For Bukit Puteri POM, the risk assessment was guided by the documented procedure UM HSE Management System; OSH Risk Management Procedure; Doc Number: HSE/SP/01; Dated: 2021. HIRARC was available for all operations within the Mill to identify the hazards, assess and recommended control measures to minimize the risks. Among the HIRARC sampled were Effluent Treatment Plant, Kernel Station, Boiler Station and Processing. HIRARCs have been recently reviewed due to accidents that occur in regard to the related activity.</p> <p>Both Bukit Puteri POM and Bukit Puteri Estate established the Safety and Health Management Plan documented in Environment, Safety and Health Plan FY 2022. The management plan includes the ESH Risk Management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring and Health Monitoring.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>Effectiveness of the H&S plan to address health and safety risks to people is monitored, amongst all including the following:</p> <p>Bukit Puteri Estate:</p> <ul style="list-style-type: none"> - Chemical Health Risk Assessment Report for Bukit Puteri Estate Sime Darby Plantation; By: Azhar Hazardous Chemical Consultancy; Assessor name: Mohamad Khairil Azhar Bin Mohd Salim; DOSH Reg. # HQ/14/ASS/00/358; Report Ref. # HQ/14/ASS/00/00001-2020/13; Assessment date: 10/6/2020 - Baseline Noise Risk Assessment Report; Sime Darby Plantation Berhad Ladang Bukit Puteri; DOSH Reg. # PH/04/04/556; Date of monitoring: 24/9/2021; Noise Risk Assessor: Mohd Hazry Bin Yusof; DOSH Registration: HQ/09/PEB/00/97 <p>Bukit Puteri POM:</p> <ul style="list-style-type: none"> - Chemical Health Risk Assessment Report for Bukit Puteri Palm Oil Mill Sime Darby Plantation; By: Azhar Hazardous Chemical 	Complied

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

		<p>Consultancy; Assessor name: Mohamad Khairil Azhar Bin Mohd Salim; DOSH Reg. # HQ/14/ASS/00/358; Report Ref. # HQ/14/ASS/00/00001-2020/8; Assessment date: 10/6/2020</p> <ul style="list-style-type: none"> - Medical Surveillance Report 2021; 10/3/2021 – 22/4/2021; Bukit Puteri Palm Oil Mill; N-Hexane & Manganese Welding Fumes Document for DOSH by Dr. Affendy Bin Bapokutty; OHD Reg. # HQ/14/DOC/00/369; Klinik Sulaiman Kuala Lipis - 2022 Annual Medical Surveillance already planned to be conducted as per Purchase Order award to Klinik Sulaiman; Contract Form # 4300578515; Date: 18/3/2022 - Local Exhaust Ventilation Annual Inspection, Examination and Testing Report August 2021 for Bukit Puteri Palm Oil Mill; Report Ref. # HQ/16/JHII/00/214; Monitoring Date: 6/8/2021 by Alam Hijau Integrasi (M) Sdn. Bhd. - Audiometry Report 2022 Bukit Puteri Palm Oil Mill by Dr. Muhammad Zafri Zainuddin; Klinik Sulaiman; DOSH Reg. # JKPP HQ/15/DOC/00/390 - Noise Risk Assessment Report; Bukit Puteri Oil Mill; Prepared by: Hitec Iesh Holding (M) Sdn. Bhd.; Report # HQ/11/PEB/00/118-OM; Monitoring date: 4/7/2020 & 2/2/2021. 	
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>Documented programme that provides training is in place based on the training need analysis conducted annually for management personnel, employees and stakeholders.</p> <p>Annual training programmes established for identified trainings covers the aspects of company sustainability policies and procedures that include occupational safety and health, environmental and social mainly for all employees.</p>	<p>Complied</p>

		For stakeholders, other than company sustainability policies and procedures, there are specific trainings such as OHS, discipline and waste management for contractors. The recent COVID-19 pandemic topic also covered in the trainings mainly on the SOP awareness such as social distancing, regular sanitization and use of PPE (Face Mask).																																								
3.7.2	Records of training are maintained. - Minor Compliance -	<p>Records of training are maintained by both Bukit Puteri POM and Bukit Puteri Estate as per sample as following:</p> <table border="1"> <thead> <tr> <th>Trainings</th> <th>Attendance</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Sexual Harassment Awareness</td> <td>All employees</td> <td>12/3/2022</td> </tr> <tr> <td>Sustainability Policies & Procedures</td> <td>External stakeholders</td> <td>29/3/2022</td> </tr> <tr> <td>Briefing on Child Labour</td> <td>All employees</td> <td>28/3/2022</td> </tr> <tr> <td>Code of Business Conduct</td> <td>All employees</td> <td>30/3/2022</td> </tr> <tr> <td>HCV Briefing</td> <td>All employees</td> <td>26/2/2022</td> </tr> <tr> <td>Ear Plug Usage</td> <td>All employees</td> <td>3/11/2021</td> </tr> <tr> <td>Code of Business Conduct</td> <td>Contractors</td> <td>1/4/2022</td> </tr> <tr> <td>Vacation Leave Pay</td> <td>All employees</td> <td>28/3/2022</td> </tr> <tr> <td>LOTO Refresher Training</td> <td>All employees</td> <td>7/2/2022</td> </tr> <tr> <td>Safety Briefing by DOSH</td> <td>All employees</td> <td>21/2/2022</td> </tr> <tr> <td>Complaints Channel for Workers</td> <td>All employees</td> <td>23/12/2021</td> </tr> <tr> <td>Hearing Conservation Training</td> <td>All employees</td> <td>16/1/2021</td> </tr> </tbody> </table>	Trainings	Attendance	Date	Sexual Harassment Awareness	All employees	12/3/2022	Sustainability Policies & Procedures	External stakeholders	29/3/2022	Briefing on Child Labour	All employees	28/3/2022	Code of Business Conduct	All employees	30/3/2022	HCV Briefing	All employees	26/2/2022	Ear Plug Usage	All employees	3/11/2021	Code of Business Conduct	Contractors	1/4/2022	Vacation Leave Pay	All employees	28/3/2022	LOTO Refresher Training	All employees	7/2/2022	Safety Briefing by DOSH	All employees	21/2/2022	Complaints Channel for Workers	All employees	23/12/2021	Hearing Conservation Training	All employees	16/1/2021	Complied
Trainings	Attendance	Date																																								
Sexual Harassment Awareness	All employees	12/3/2022																																								
Sustainability Policies & Procedures	External stakeholders	29/3/2022																																								
Briefing on Child Labour	All employees	28/3/2022																																								
Code of Business Conduct	All employees	30/3/2022																																								
HCV Briefing	All employees	26/2/2022																																								
Ear Plug Usage	All employees	3/11/2021																																								
Code of Business Conduct	Contractors	1/4/2022																																								
Vacation Leave Pay	All employees	28/3/2022																																								
LOTO Refresher Training	All employees	7/2/2022																																								
Safety Briefing by DOSH	All employees	21/2/2022																																								
Complaints Channel for Workers	All employees	23/12/2021																																								
Hearing Conservation Training	All employees	16/1/2021																																								
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor Compliance -	Training conducted from time to time to all personnel critical in SCCS effective implementation. Latest training was conducted by Regional Sustainability & Quality Management (RSQM) personnel, Puan. Raanon Gandon attended Bukit Puteri Mill Manager,	Complied																																							

		Assistant Mill Manager, Lab Supervisor, Lab Despatch Operator, Weighbridge Clerk and Auxiliary Police.	
Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C) . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	Bukit Puteri POM is under mass balance module. Thus, this indicator is not applicable.	Not Applicable
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Bukit Puteri POM receives and process both certified and noncertified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage	All figures are reported in Table 10 Summary of Certified Tonnage (MT) section of this report.	Complied

	produced shall then be recorded in each subsequent annual surveillance report.												
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>The mill meet all registration requirements of RSPO PalmTrace with information as following:</p> <table border="1" data-bbox="1153 517 1928 751"> <tr> <td>Member Name</td> <td>Bukit Puteri Oil Mill</td> </tr> <tr> <td>Member ID</td> <td>RSPO_PO1000000192</td> </tr> <tr> <td>RSPO Membership Number</td> <td>1-0008-04-000-00 (Sime Darby Plantation Berhad)</td> </tr> <tr> <td>Type of Business</td> <td>Oil mill</td> </tr> <tr> <td>Issued On</td> <td>06-09-2021</td> </tr> </table>	Member Name	Bukit Puteri Oil Mill	Member ID	RSPO_PO1000000192	RSPO Membership Number	1-0008-04-000-00 (Sime Darby Plantation Berhad)	Type of Business	Oil mill	Issued On	06-09-2021	Complied
Member Name	Bukit Puteri Oil Mill												
Member ID	RSPO_PO1000000192												
RSPO Membership Number	1-0008-04-000-00 (Sime Darby Plantation Berhad)												
Type of Business	Oil mill												
Issued On	06-09-2021												
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. 	Established as Sustainability Plantation Management System (SPMS) Appendix 15; Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability; Version 2; Issue # 5; Issue date: April 2019	Complied										

<p>3.8.6</p>	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports. 	<p>SCCS internal audit was conducted based on the SPMS Appendix 15 SOP for Sustainable Supply Chain and Traceability; Version 2; Issue # 5; Issue date: April 2019. Latest SCCS internal audit for SOU 10 Bukit Puteri POM was conducted on 3/3/2022. 3 Major NCs raised by internal auditors were verified closed on 5/4/2022.</p> <p>Prior to NC closure, management review meeting were conducted on 22/3/2022 to discuss further issue on internal audit findings corrections and corrective actions. Sighted the minutes of meeting for management review meeting of SOU 10 meeting FY 2022.</p>	<p>Complied</p>
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>Purchasing and Goods In documents maintained as per sample verified as following:</p> <ul style="list-style-type: none"> i) Bukit Puteri POM received RSPO certified FFB only from Bukit Puteri Estate as per sample sighted as following: ii) Certified FFB: FFB Receive Ticket # 141199; Date: 6/4/2022; Supplier: E297 – E-Bukit Puteri; Transporter: Mahu Berjaya Enterprise; Product: 0001 – FFB A Crop; Nett weight: 4,310 kg; C/N # 143640; Cert. # RSPO 745403 iii) Uncertified FFB: FFB Receive Ticket # 139389; Date: 31/1/2022; Supplier: Agarwal Oil Palm; Transporter: Noor Azlan Kasmani; Product: 0002 – FFB B Crop; Nett weight: 5,740 kg; C/N # AOP00088 	<p>Complied</p>
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The</p>	<p>Sales and Goods Out documents maintained as per sample verified as following:</p> <p>Certified CPO:</p>	<p>Complied</p>

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

	<p>information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<ul style="list-style-type: none"> - Buyer: SDOPKR – Sime Darby Plantation Berhad; Nuri Edible Oil (NEO) Complex, Lot 27, PT 234 Lebu Sultan Mohamed 1, Kawasan Perusahaan PKNS Fasa II, Bandar Sultan Sulaiman, Pelabuhan Klang, 42000, Selangor - Seller: Sime Darby Plantation Sdn. Bhd. Bukit Puteri Palm Oil Mill, Peti Surat 31, 27750, Sg. Koyan, Raub, Pahang Darul Makmur - Despatch Ticket # 005432; Date: 22/3/2022 - RSPO Cert. # RSPO 745403 - Product: 0007 – Crude Palm Oil (CPO) – RSPO MB - Nett weight: 38,520 kg - Vehicle # NDF2161 - Palm oil despatch note # 4720 <p>Certified PK:</p> <ul style="list-style-type: none"> - Buyer: SDO Carey KCP – SDP Nuri KCP (NK); Kernel Crushing Plant Pulau Carey, Lot 2666, East Estate, Carey Island, Kuala Langat, Selangor - Seller: Sime Darby Plantation Sdn. Bhd. Bukit Puteri Palm Oil Mill, Peti Surat 31, 27750, Sg. Koyan, Raub, Pahang Darul Makmur - Despatch Ticket # 005438; Date: 26/3/2022 - RSPO Cert. # RSPO 745403 - Product: 0008 – Palm Kernel – RSPO MB - Nett weight: 39,460 kg - Vehicle # SMD5943 - Palm kernel despatch advice chit # 1686 	
--	---	---	--

<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>Based on Sime Darby Plantation Sdn. Bhd. COP Transportation Standard Operating Procedures (Peninsular Malaysia) Issue date: 1/12/2008. As per sample as following:</p> <ul style="list-style-type: none"> - Agreement between Sime Darby Plantation Berhad and Nashreena International (M) Sdn. Bhd. – Agreement on the Transportation of Crude Palm Oil (CPO) for Sime Darby Plantation Berhad’s Peninsular Malaysia Oil Mills; Initial term: 3 years commencing from 1/11/2020 and expiring on 31/10/2023 <p>SCCS training to tanker driver provided by RSQM personnel Pn. Raanon Gandon on 16/3/2021.</p>	<p>Complied</p>
<p>3.8.10</p>	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>The list of outsourced contractors was sighted, “list of stakeholders” to include the transport contractor for CPO and PK i.e. Nashreena International (M) Sdn. Bhd. The independent third parties involve in Mill operation is only transportation services for CPO and PK.</p>	<p>Complied</p>

3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	No new contractor used for the processing or physical handling of RSPO certified oil palm products transportation.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>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>Accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements available for verification. As spelt out in its supply chain procedure, Clause 5.4, records are to be maintained minimum of two years for sample records as per following:</p> <ul style="list-style-type: none"> - Mass Balancing Records for Oil Mills; Mill name: KKS Bukit Puteri - Daily Production Summary Report - Monthly Production Summary Report <p>Based on mass balance sheet latest dated end of March 2022, no negative stock recorded.</p>	Complied
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</p>	The oil extraction rate (OER) and the kernel extraction rate (KER) for Bukit Puteri POM is determined and set their own extraction	Complied

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

	PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	rates based upon past experience, documented and applied consistently.	
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	For the last review period from April 2021 to March 2022 the OER: 20.97% and KER: 4.54% were reported.	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	Not applicable for mass balance module.	Not Applicable
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	Shipping Announcement in the RSPO IT platform carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not within three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.	Complied
3.8.17	Claims 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.	There is no claim on RSPO SCCS by Bukit Puteri POM.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Bukit Puteri POM and verified through document and site review (notice board, business card,	Complied

		shipping documentation, procurement/ purchasing document and promotional material etc).	
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member’s history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org ’ where the link must lead to the member’s profile page.	Not applicable since no off-product claim made by Bukit Puteri POM since last audit.	Not Applicable
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable since no off-product claim made by Bukit Puteri POM since last audit.	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 since no off-product claim made by Bukit Puteri POM since last audit.	Not Applicable
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Bukit Puteri POM and verified through document and site review (notice board, business card, shipping documentation, etc.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication was demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the	As per interview with weighbridge operator, she said that the weighbridge ticket will be stated the info i.e: product/commodity	Complied

	supply chain model and certificate number under which the claim is being made.	with SCC model (Crude Palm Oil RSPO MB) and will stamp the RSPO certificate number. Verified the documents found that the supply chain model and certificate number were stated on the ticket.	
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	Not applicable since Bukit Puteri POM is a mill and not distributor or wholesaler category.	Not Applicable
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.	Not applicable since Bukit Puteri POM not producing consumer products or use business to consumer communication.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Not applicable since Bukit Puteri POM not producing consumer products or use business to consumer communication.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Not applicable since Bukit Puteri POM not producing consumer products or use business to consumer communication.	Not Applicable

6.4	Business to consumer communication shall not include information about the claimant’s RSPO membership status.	Not applicable since Bukit Puteri POM not producing consumer products or use business to consumer communication.	Not Applicable
6.5	Members shall not communicate to consumers’ information about their suppliers’ RSPO membership status.	Not applicable since Bukit Puteri POM not producing consumer products or use business to consumer communication.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	Not applicable since Bukit Puteri POM not producing consumer products or use business to consumer communication.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Not applicable since Bukit Puteri POM not producing consumer products or use business to consumer communication.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org .	Not applicable since Bukit Puteri POM not producing consumer products or use business to consumer communication.	Not Applicable

MODULE B – MASS BALANCE SPECIFIC RULES

Minimum Mass Balance content

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

	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>No messaging involved since Bukit Puteri POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>Complied</p>
<p>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has established Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & no exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC). The HRC was last revised on August 2020. They promote the human rights, safeguard democracy and its institutions and not violate the rights of others. They also recognize the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, they are committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration and</p>	<p>Complied</p>

		<p>response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as respond to complaints on any alleged threats made to them. Refer to Policy on the Protection of Human Rights Defenders (HRDs) dated 25/03/2020 for more information. Policy on the Protection of HRDs_FINAL.pdf (sime-darbyplantation.com).</p> <p>The policies were communicated to stakeholders during stakeholder meetings. Besides, the briefing of the policies was conducted on 12/3/2022 in Bukit Puteri Oil Mill and 29/3/2022 in Bukit Puteri Estate.</p>	
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>Sime Darby Plantation prohibits any form of harassment in their operation as per the policies above. Interviewed with the workers confirmed that no harassment by the management.</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>Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they believe everyone has the responsibility to promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognise the important role Human Rights Defenders, whistle-blowers, complainants and community spokespersons play by lodging complaints in confidence. Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008.</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>Sime Darby have established system to handled issue regarding to social as per below;-</p> <ul style="list-style-type: none"> - <u>Social dialogue tool kit</u> <p>This session is about management and workers engagement between representative of workers, and employer (operating unit management) to resolve workplace and living condition</p>	Complied

		<p>issues through social dialogue. This dialogue frequency will handle every 2 weeks once. The issue that been raised during this dialogue will be recorded under tracker. This tracker will be captured in the dashboard and available to RGM, RCEO, ILO WG. This system rolls out on 22/12/2021 (Phase 3 & Phase 4) to operating unit. Social Dialogue dated 24/02/2022, 09/02/2022, 26/01/2022, 19/01/2022 and 03/01/2022.</p> <p>- <u>Oil Palm Pal (OPP)</u> Establish and start been using on 4/12/2021 in SOU Bukit Puteri. This OPP was a digitalized data management to capture all complaint/request for repair of workers houses and monitor progress of repair works to completion. The latest record of OPP in Bukit Puteri estate was on 29/3/2022 regarding to door of their house was need repair. The issue raised on 29/3/2022 and solved on 30/3/2022. From the previous record no issue was solved more than 3 days.</p> <p>The management also briefed during Gender meeting, stakeholder meeting and Union meeting. Latest Gender meeting conducted on 18/2/2022. For Social Dialogue meeting conducted on 25/3/2022.</p>	
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Based on complaints in Oil Palm Pal sighted, no grievances have been filed against Bukit Puteri Mill and its supply base. Records of complaints can only be seen from housing defects at the linesite. Reports of repairs that needed to be carried out also contained status of repair works done and acknowledged by the complainants. The repair works were carried out within a reasonable timeframe of less than one week.</p>	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to</p>	<p>Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the</p>	Complied

	<p>choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in https://www.simedarbyplantation.com/corporate/whistleblowing. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p>	
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
<p>4.3.1</p>	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Latest contributions to community by the management are the vaccination programs (PICK-B) to their workers as per letter Bil(6) (OPD) dated 7 /2/2022. This vaccination programme conducted on 12/2/2022, this programme was collaboration between Sime Darby and Klinik Kesihatan Bukit Betong.</p>	<p>Complied</p>
<p>Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
<p>4.4.1</p>	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Bukit Puteri Oil Mill is located on the land of Bukit Puteri Estate under Land Title# HSD 30, Lot No.: PT 856.</p> <p>There are total 7 land titles in Bukit Puteri Estate and the estate able to show legal ownership on the use of land. Sampled the land title as below:</p> <ul style="list-style-type: none"> - Land Title : Lot 2488 with total area 607.3 ha - Land Title : PT 976 with total area 1092.6495 ha - Land Title: PT 1277 with total area 728.433 ha 	<p>Complied</p>

4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land. Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.	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 related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land. Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.	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 related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land. Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust	Complied

		free, prior and informed consent (FPIC) process to any new developed.	
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 related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	There is neither customary rights nor land dispute in Bukit Puteri Estate. Boundary stone was identified and marked in the GPS surveyed map. Trenches were available to demarcate the boundary and this has confirmed by interviewed with the neighbouring smallholder and local community.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied

Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	Not applicable since no new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	Not applicable since no new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is</p>	Not applicable since no new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable

	independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -		
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	Not applicable since no new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	Not applicable since no new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	Not applicable since no new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied

4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>The same developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008 includes the procedure for calculating and distributing fair compensation if any.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
<p>Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p>	Complied

4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>The same developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008 includes the procedure for calculating and distributing fair compensation if any.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>There was no community that have lost access and rights to land for plantation expansion as the operating units expands the planting area under certified area.</p>	Complied
<p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>Not applicable since based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Bukit Puteri POM and its supply base were not newly acquired units.</p>	Not Applicable
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use</p>	<p>Not applicable since based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Bukit Puteri POM and its supply base were not newly acquired units.</p>	Not Applicable

	rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -		
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	Not applicable since based on documents sighted and interviews conducted with stakeholders, there was no evidence of any dispute with any previous owner or occupants. Bukit Puteri POM and its supply base were not newly acquired units.	Not Applicable
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 period prices paid for FFB are publicly available and accessible by smallholders and all OCP suppliers as displayed on the mill weighbridge counter.	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 -	Based on sample FFB Purchase Agreement between Bukit Puteri POM and OCP, all contracts signed between OCP and Bukit Puteri POM were attached with evidence that the mill explains the FFB pricing as per sighted for sample as following: - Nor Azlan Bin Kasmani; Agreement # P/C/1221/FFB03307L; MPOB License # 617406015000; Expired date: 31/5/2022 - Pertiwi Palms Sdn. Bhd.; Agreement # P/C/1221/FFB03309L; MPOB License # 535662115000; Expired date: 31/1/2023 - MXF Gemilang Enterprise; Agreement # P/C/1221/FFB03313L; MPOB License # 618974002000; Expired date: 31/1/2023 - Tee Chin Keong; Agreement # P/C/1221/FFB03310L; MPOB License # 816411001022; Expired date: 31/5/2025	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.	Based on sample FFB Purchase Agreement between Bukit Puteri POM and OCP, all contracts signed between OCP and Bukit Puteri	Complied

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

	- Critical (Major) compliance -	<p>POM were attached with the calculation of FFB pricing which is fair to both the OCP and the mill as per sighted for sample as following:</p> <ul style="list-style-type: none"> - Nor Azlan Bin Kasmani; Agreement # P/C/1221/FFB03307L; MPOB License # 617406015000; Expired date: 31/5/2022 - Pertiwi Palms Sdn. Bhd.; Agreement # P/C/1221/FFB03309L; MPOB License # 535662115000; Expired date: 31/1/2023 - MXF Gemilang Enterprise; Agreement # P/C/1221/FFB03313L; MPOB License # 618974002000; Expired date: 31/1/2023 - Tee Chin Keong; Agreement # P/C/1221/FFB03310L; MPOB License # 816411001022; Expired date: 31/5/2025 	
5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>Based on sample FFB Purchase Agreement between Bukit Puteri POM and OCP, all contracts signed between OCP and Bukit Puteri POM were attached with supplemental Vendor Integrity Pledge and COBC which include the specific clauses on meeting applicable legal requirements sighted for sample as following:</p> <ul style="list-style-type: none"> - Nor Azlan Bin Kasmani; Agreement # P/C/1221/FFB03307L; MPOB License # 617406015000; Expired date: 31/5/2022 - Pertiwi Palms Sdn. Bhd.; Agreement # P/C/1221/FFB03309L; MPOB License # 535662115000; Expired date: 31/1/2023 - MXF Gemilang Enterprise; Agreement # P/C/1221/FFB03313L; MPOB License # 618974002000; Expired date: 31/1/2023 - Tee Chin Keong; Agreement # P/C/1221/FFB03310L; MPOB License # 816411001022; Expired date: 31/5/2025 	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Based on sample FFB Purchase Agreement between Bukit Puteri POM and OCP, all contracts signed between OCP and Bukit Puteri POM were attached with supplemental Vendor Integrity Pledge and COBC which are fair, legal and transparent and have an agreed timeframe sighted for sample as following:</p>	Complied

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

		<ul style="list-style-type: none"> - Nor Azlan Bin Kasmani; Agreement # P/C/1221/FFB03307L; MPOB License # 617406015000; Expired date: 31/5/2022 - Pertiwi Palms Sdn. Bhd.; Agreement # P/C/1221/FFB03309L; MPOB License # 535662115000; Expired date: 31/1/2023 - MXF Gemilang Enterprise; Agreement # P/C/1221/FFB03313L; MPOB License # 618974002000; Expired date: 31/1/2023 - Tee Chin Keong; Agreement # P/C/1221/FFB03310L; MPOB License # 816411001022; Expired date: 31/5/2025 	
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Based on consultation made with the sample OCP suppliers, the payments were always made on time as per payment terms stated in the OCP contract agreement under section 9. Payment and set out in Section 5 of the First Schedule.</p> <p>Reviewed the sampled payment for Noor Azlan bin Kasmani (contract no. BPOM/ITQ/OPEX0001/2022) as per invoice no. IV00312 and payment voucher no. 160000951 dated 05/04/2022.</p>	Complied
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>The mill and estate conducted the weighbridge calibration on annually basis base on applicable laws and regulations. Reviewed the latest calibration and stamping Bukit Puteri POM with serial no. B737684825 dated 10/01/2022.</p>	Complied
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	<p>Based on sample FFB Purchase Agreement between Bukit Puteri POM and OCP, all contracts signed between OCP and Bukit Puteri POM were attached with supplemental Vendor Integrity Pledge and COBC which include the specific clauses on meeting applicable legal requirements sighted for sample as following:</p> <ul style="list-style-type: none"> - Nor Azlan Bin Kasmani; Agreement # P/C/1221/FFB03307L; MPOB License # 617406015000; Expired date: 31/5/2022 - Pertiwi Palms Sdn. Bhd.; Agreement # P/C/1221/FFB03309L; MPOB License # 535662115000; Expired date: 31/1/2023 	Complied

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

		<ul style="list-style-type: none"> - MXF Gemilang Enterprise; Agreement # P/C/1221/FFB03313L; MPOB License # 618974002000; Expired date: 31/1/2023 - Tee Chin Keong; Agreement # P/C/1221/FFB03310L; MPOB License # 816411001022; Expired date: 31/5/2025 	
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>	No grievance received from external FFB suppliers since the last audit. Sime Darby Plantation Mill Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 1, issue date 01/04/2008) established to handle if there is any external complaint. Interviewed with the FFB supplier and he is able to show the understanding on the complaint mechanism.	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	<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>	There was an OCP Engagement Program latest conducted on 29/03/2021 to involve the smallholders and collection centre to explain the sustainability and RSG to the smallholders. The program has involved MPOB officers to explain on the certification as well.	Complied
5.2.2	<p>The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).</p> <p>- Minor compliance -</p>	Sime Darby Plantation as a group has developed Standard Operating Procedure for Responsible Sourcing Guidelines (RSG) with Doc. No.: SD/SDP/GS/001 dated June 2020 in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers. There was a OCP Engagement Program conducted on 29/03/2021 to involve the smallholders and collection centre to explain the sustainability and RSG to the smallholders.	Complied
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	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	Complied

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

		reproductive and maternal rights. The policy could be downloaded from https://www.simedarbyplantation.com/sustainability/humanrights-charter .	
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>	Interviewed with the workers comprises of different gender and nationalities as well as the parolees confirmed that no discrimination has reported. The management treated all equally such as provided free accommodation and medical to all the workers, no charging of recruitment fees for the foreign workers and offered job based on capability. The worker can request for job transfer if they found they unfit for the job assigned to them.	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>	Sime Darby Plantation has developed a Career Progression for Workers Level (both local and foreign workers), Doc. No.: SDP/HRUM/2020/SOP01 where the promotion of workers is based on the work performance, suitability, and the leadership quality of the worker. The recruitment of foreign workers is through Human Resource Department in HQ based the regulation requirements. The company also posting at all social media for their recruitment example as per latest banner dated 16/3/2022, stated that company in progress to hire harvester, tractor driver, mechanic and mill operator and this recruitment was open to all Malaysian.	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	Interviewed with the female employees in Bukit Puteri Oil Mill and Bukit Puteri Estate confirmed that pregnancy testing is not conducted prior to work. They still will be able to offer for work if they are pregnant.	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	Gender Committee was established in both Bukit Puteri Oil Mill and Bukit Puteri Estate. Seen the appointment letters of the committee from Bukit Puteri Oil Mill and Bukit Puteri Estate.	Complied

		<p>Gender Committee has organized meeting and the last meetings were conducted on 18/2/2022 in Bukit Puteri Estate. There was no issue raised in Bukit Puteri Oil Mill and Bukit Puteri Estate. Interviewed with the Chairman of Gender Committee in Bukit Puteri Oil Mill and Bukit Puteri Estate confirmed no case of sexual harassment or violence reported. Activity such as hiking was organized by the committee which involved the family members as well.</p> <p>The gender committee have been appointed by management as per verification on appointment letter dated 19/2/2022.</p> <p>Sexual harassment training already been conducted dated 12/3/2022 as per record verification. All workers have been join the training including male workers.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Reviewed total 23 payslips in Bukit Puteri Oil Mill and Bukit Puteri Estate which consists of male and female workers found that their salary is the same for the same job scope. They were paid according to the Minimum Wage Order 2020 without any discrimination. Interviewed with both the female and male workers confirmed that no discrimination has occurred.</p>	Complied
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby has sign the Collective Agreement with National Union of Plantation Workers (NUPW). Sample of employment contracts are reviewed, and the agreements are signed in both English and home country language (i.e. Hindi, Bahasa Malaysia/Indonesia). Upon the foreign workers arriving to the estate, they will be inducted for the terms and conditions of employment contract and briefed on the company's policies. This has confirmed by interviewed with the</p>	Complied

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

		foreign workers. Latest NUPW meeting conducted on 12/1/2022 the record was available as per verification.	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Reviewed total 23 employment contracts in Bukit Puteri estate and Bukit Puteri POM, and the contracts are signed in their dual language which is English and their home country language such as Hindi, Bahasa Malaysia/Indonesia/Nepalese. The terms and conditions such as working hours, deduction, overtime, sick leave, holiday entitlement, reason of dismissal and period of notice were outlined in the contract. The extension contract has outlined the terms and condition according to the Employment Act 1955 and Minimum Wage Order 2020. Version of extension contract, "Employment Contract Extension for Foreign Worker (Peninsular – Indonesia/ Nepalese) – ECE1 was sighted.</p>	Complied
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>Based on review of workers' sampled punch cards, employment contracts and payslips, evidence was available that Bukit Puteri Mill and its supply base were able to demonstrate compliance with Employment Act 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCSO, EPF, EIS) and non-statutory deductions (e.g. sports and recreation club, <i>surau</i> funds, electricity bills, union membership, etc) in accordance with the relevant laws and Labour Office permits.</p> <p>From the verification on estate and mill for 23 workers payslip in Bukit Puteri Estate and Bukit Puteri Mill showed that no recurrence issue regarding to reimbursement of RM 3 made to the worker as per MAPA/NUPW Circular No. 22/2015 dated 4/8/2015. As per sampling all workers that join NUPW have reimbursement of RM 3.</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</p>	<p>From the Bukit Puteri estate and Mill showed that the Estates were able to demonstrate that they provided free adequate housing with sanitation facilities, free water and electric supplies, houses of</p>	Complied

	<p>or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>worship, recreational amenities such as football fields, canteen, sundry shop, multi-purpose hall and medical facilities which could be enjoyed by all works and their dependents.</p> <p>Houses have between 2 to 3 bedrooms with between 1 to 2 occupants per house. The areas surrounding the housing area are generally clean and well maintained, and houses were generally in good state of repair and grass kept reasonably short, domestic waste bins are emptied twice weekly and perimeter drains are clear of any blockages. The MA in estate also have conducted the linesite inspection weekly basis for Mill and estate workers housing at 30/3/2022, 18/3/2022 and 12/3/2022.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>All the workers have provided with 10kg of rice once every two months and water subsidy 35 gallon as per company’s policy. Seen the records of distribution of rice for January 2021. Interviewed with the workers confirmed that they are easily access to adequate, sufficient, and affordable foods where the mill and estate are neighbouring to the small town where they can easily access.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to</p>	<p>SOU 10 Bukit Puteri has established the prevailing wage calculation to include all the in-kind benefits provided to the workers. Sampled the prevailing wages for benefit of Maintenance & utilities – RM 67.53 for local workers and foreign workers, creche maintenance cost - RM 23.22 for local workers and phone reload – RM 5 for both local workers and foreign workers. The prevailing wages is more than the Minimum Wage Order 2020. No changes as per previous year.</p>	Complied

<p>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	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>All the core works are performed by permanent and full-time employees in SOU 10 Bukit Puteri Oil Mill and supply bases. No contract worker was employed. The estate has appointed contractor for FFB transporter and the workers are permanently working in the estate.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter where they respect Freedom of Association by respecting the rights of employees to form and join unions and bargain collectively. In jurisdictions where this right is limited, they will provide alternative means of employee engagement and grievance redressal.</p> <p>The policy was communicated to the workers conducted on 11/01/2021 in Bukit Puteri Oil Mill and 24-25/03/2021 in Bukit Puteri Estate.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>SDPB has incorporated its policy on freedom of association in the "Group Sustainability & Quality Policy Statement" mention in Indicator 4.1.1.2 where the management is committed and respect the rights of all personnel to join or form any organizations of their choice and to bargain collectively. The mill management allowed their workers to form or join any association such as NUPW. Document reviewed on their payslip found that they are deducted for the NUPW subscription fees of RM 8 monthly.</p> <p>Latest meeting between Mill Management and NUPW representative was conducted on 15/02/2022 to discuss issues related to workers. The minutes of meeting were available for verification and found properly documented. Additionally, the NUPW representative was members of Social Dialogue committee as workers representative.</p>	Complied

		Noted during interview with the workers confirmed that they can join any trade union freely.	
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 -	Interviewed with the NUPW representatives and the workers confirmed that the election of the representatives were elected freely by the workers without any interference of management.	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 -	Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They recognize that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography. They are eradicating child labour in all their supply chain and not employ anyone underage of 18 years. All the contractors have to read through Vendor COBC before they signed on the Vendor Integrity Pledge. Under Clause 5.8, vendor shall not employ anyone under the age of 18 or the applicable minimum legal age in the countries they operate. Verified as per sampling on Mahu Berjaya Enterprise (Registration: CA0064653H) dated 22/1/2022. This LOA (Letter of Awards) was valid until 31/12/2023.	Complied
6.4.2	(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.	Workforce Management Unit has developed SOPP under Clause 3.1.13 LR13 – Recruitment Drive & Interview/ Selection of Foreign Workers where the minimum requirement of the age is 18 years old. Besides, Guideline on the Recruitment of Local Workers dated	Complied

	- Critical (Major) compliance -	07/12/2020 has stated the applicant of workers must be above 18 years of age. Age screening is based on identification documents and/ or passport and from the stated date of birth. The local employees have to submit a photocopy of identification card during.	
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Employee Master Listing and through interviewed with the stakeholders.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	The management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders. Latest Training to workers was conducted on 13/1/2022	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter where they create a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict. This policy have been communicated to workers on 11/3/2022 included with male workers.	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They facilitate opportunities for advancement for their employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The Policy provides protection of reproductive rights of all workers. The Labour Standard specifies that the Company recognizes the rights of employees to	Complied

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

		<p>reproduction and reproductive health, including the right to make decision on reproduction.</p> <p>Interviews with female employees also show that this Standard is being implemented where female workers are entitled to 60 days paid maternity leave, and pregnant women are given light work to do. This Standard was communicated to all levels of workforce during briefings on Company policies was on 11/1/2021 and 1/4/2022.</p>	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Briefing of the new mother assessment was conducted during the Gender Committee meeting in Bukit Puteri Oil Mill and Bukit Puteri Estate.</p> <p>A census form to assess the needs of new mothers is available. This form enables the assessment to be done of new mothers' needs for creche/childcare, antenatal, vaccination, maternity and paternity, postpartum care, prenatal check-up, breastfeeding facilities, awareness and counselling.</p> <p>There was assessment for new mothers conducted on 5/1/2022 in Bukit Puteri Estate for new mothers who are have a child (1 Year old). They do not have specific needs during their pregnancy period however the management change the job from nursery into Office gardener. For Mill there are 1 new mother available, the management have given 1 hour break time for the new mother (For breast feeding their child) as per required referred in assessment. Interviewed with the both mothers confirmed that the committee has consulted their needs as a new mother.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>On 15-24 December 2014, the Gender committee establish the Incident report template, the Flowchart and Procedure on Handling Social Issues, version 2, dated 24/12/2014 was implemented as well. There also emergency line such as Talian Nur for issue regarding to Domestic violence. Besides, the company has</p>	Complied

		<p>implemented Whistleblowing Channels where the eForm, email address and toll free number/ hotline can be found in http://www.simedarbyplantation.com/corporate/governance/whistleblowing. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p> <p>A Complaint Form for sexual harassment was implemented in Bukit Puteri Oil Mill to monitor if there was any cases reported.</p>	
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Bukit Puteri Estates were able to demonstrate that all workers have entered into employment voluntarily. This was further confirmed from interviews conducted with the workers themselves.</p> <p>For Passports, Workers are given the option of either keeping their own passports, or to keep their passports at the management office for safety reasons. As per interview with workers in estate they confirm that they keep the passport at their own.</p> <p>Involuntary overtime based on documents signed by workers on overtime, and based on interviews conducted, there is no evidence of involuntary overtime within the Estates.</p> <p>Lack of freedom of workers to resign & penalty for termination of employment, Clause 5 of employment contracts allow for early termination of contract by giving of 2 months' notice (upon confirmation) and 2 weeks' notice (on probation). There is no mention of any penalty payable.</p>	<p>Complied</p>

		Debt bondage & withholding of wages, based on payslips sighted and interview with workers, there was no evidence of any debt bondage and withholding of wages.	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB has implemented a Sime Darby’s Human Rights Charter revised 2020 and can be access via company’s web portal i.e. https://simedarbyplantation.com/wp-content/uploads/2021/12/HRC-2020-1.pdf where they committed as below:</p> <ul style="list-style-type: none"> - Providing equal opportunity - Respecting freedom of association - Eradicating any form of exploitation - Providing decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs - Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution. <p>All the foreign workers will be provided with induction training prior to work. Besides, they were provided with decent living condition and free from any discrimination. The workers informed that they were treated equally without any discrimination and allow joining NUPW freely. No contract substitution has occurred through interviewed with the workers.</p>	Complied
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.</p>	<p>The Mill Manager, Mr. Mohd Aerman Bin Ahmad was appointed to be the Chairman of OSH Committee at the Mill as stated in the appointment letter dated 01/11/2021 undersigned by the Regional CEO (Central Region Region). Identified Bukit Puteri Estate</p>	Complied

	<p>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>Occupational Safety and Health Committee Chairman 2022 is Mr. Mohd. Safirus Bin Hailani, Senior Manager as per Appointment Letter for Occupational Safety and Health Committee Chairman from Regional CEO dated 1/11/2021. Secretary is Mr. Vijayan A/L Santasekaran. Sighted the Safety and Health Management Policy and Committee Organization Chart in the Occupational Safety and Health/JKKP (BPE13) file. Committee members consist of 10 employer representative, 10 employee representative and 5 invitational representatives selected among vendors, HQ personnel, Regional department and community representatives.</p> <p>Latest Occupational Safety and Health Committee meeting for Bukit Puteri Estate was conducted on 21/3/2022 attended by 22 committee members including chairman. Meeting agenda includes the following:</p> <ul style="list-style-type: none"> - Matters arising - Latest accident case report/accident statistic - Training/courses - Work place inspection report - Sime Card - HIRARC monitoring - DOSH monitoring - Environmental issue - Social/health activities - Complaints/feedbacks among members - Other matters <p>Previous meeting was conducted on 9/12/2021, 14/6/2021 and 16/3/2021.</p>	
--	---	--	--

<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency procedures are available in the ESH Management System Manual; Emergency Preparedness & Response Guidelines and Procedures; Doc No: SD/SDP/SQM (ESH)/001-2-6; Revision:0; Date 1/7/2012 with sample assigned operatives and response team as following:</p> <ul style="list-style-type: none"> - Emergency Response Team (ERT) Bukit Puteri Estate 2021 - Response Flow Chart to Trauma Accident Bukit Puteri Estate <p>The mill has established Emergency Response Team lead by the Mill Engineer. Fire Drill was conducted on 22/01/2022 at the mill. The estate has established Emergency Response Team lead by the Estate Managers. The ERT chart and Fire Extinguisher Map was also available and verified. Emergency Response Training was conducted as Fire Extinguisher and Fire Fighting Training dated on 27/01/2022.</p> <p>Accident records are recorded and maintained in the mill and discussed during the quarterly held JKPP Meetings. There was no reported accident for the year 2021 in the workplace. Sighted the JKPP 8 form submission to JKPP for the year 2021, submitted on 19/01/2022. 2 accident cases were reported for the year 2022 as of to date. The JKPP6 forms have been submitted to DOSH accordingly and were available for verification i.e. Akuan Penerimaan Pendaftaran JKPP 8; Syarikat: The China Engineers (Malaysia) Sdn. Bhd.; Ref. # JKPP 8/08556/2022; Date: 11/1/2022.</p> <p>Bukit Puteri Estate recorded all accidents reports and reported to HQ using the PSQM-ESH Monthly update form via online through GSQM ESH Portal. The accident occurred was reviewed on quarterly basis during OSH committee meeting. There were 1 accident (133 Days LTA) case for the year 2021 reported in the estate. The JKPP 8 form has been submitted to DOSH for the year ending 2021 on</p>	<p>Complied</p>
--------------	--	---	-----------------

		11/01/2022 and documents available for verification. For the year 2022 there were no accident cases reported as of to date.	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The mill has provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC and Pictorial Safety Standard (PSS) Palm Oil Mill dated 17/03/2008. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p> <p>PPE provided for free to all workers as per PPE issuance records sighted for Bukit Puteri Estate; PPE: Rubber Boot, Nitrile Glove, Cotton Glove, Mask 8210, Dupont Apron; Date: 16/3/2022 for sample Workers ID # 24118; ID # 107022; ID # 151075 & ID # 139074.</p>	Complied
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>First aiders were assigned to various workstation in the estates field and the mill such as ramp, boiler station and workshop. The mandores and staffs were responsible for first aid boxes at each workstation assigned to them by the management. The first aid box was recently replenished with all stated items available in the box. Trainings were conducted regularly with sample latest First Aid Training; Date: 31/3/2021.</p>	Complied
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Based on the DOSH NADOPOD reports, occupational injuries are recorded using Lost Time Accident (LTA) metrics as per sample for Bukit Puteri Estate as following:</p> <p>Total accident: 1 Total lost day: 133 Total manhours 2022: 628,000.00 Average workers: 250</p>	Complied

Principle 7: Protect, conserve and enhance ecosystems and the environment

Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 10 has established and implemented IPM to ensure effective pest management. Found documented in Agriculture Reference Manual. Bukit Puteri Estates implemented biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators.</p> <p>Sampled in Management Plan for IPM Implementation FY 2022:</p> <ul style="list-style-type: none"> • Intensive planting of beneficial plants in immature area. • Intensive planting of beneficial plant area prone to bagworm attack. • IPM Bagworm refreshment training. • Fixing barn owl box achieve target ratio 1:10. 	Complied
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>In SOU 10, as in Summary of species invasiveness of Bukit Puteri, the beneficial plant used for IPM such as Tunera subulata, Cassia coboanensis, and Antigonan leptopus.</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>No evidence and records of fire usage for pest control at all estate visited. Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2.</p> <p>Zero tolerance of the use of fire within our land boundaries and conservation areas, and the establishment of effective monitoring</p>	Complied

		and prevention systems, as well as protective firefighting measures in and around estate operation.”													
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.															
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The justification of pesticides used found clearly stated in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue 1, version 03, dated 01/07/11.</p> <p>Selected products are specific to the target pest, weed and disease. Some of recommended pesticides are:</p> <p>Immature planting (sample)</p> <ul style="list-style-type: none"> • General weeds : Glyphosate • Pennisetum polystachion : Metsulfuron Methyl • Stenochlaena palustris : Sodium chlorate Mature planting • Grass weed and Asystasia : Glyphosate & 2,4-D amine <p>The selection is also evaluated by the agronomist during his visit to the estate</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>Bukit Puteri Estate has maintained a 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).</p> <table border="1"> <thead> <tr> <th>Pesticides</th> <th>Active ingredient</th> <th>Ai (%)</th> </tr> </thead> <tbody> <tr> <td>Tri-Esther 32</td> <td>Triclopyr butoxy</td> <td>32</td> </tr> <tr> <td>Canyon</td> <td>metsulfuron</td> <td>20</td> </tr> <tr> <td>Hextar Cyper</td> <td>Cypermethrin</td> <td>5.50</td> </tr> </tbody> </table>	Pesticides	Active ingredient	Ai (%)	Tri-Esther 32	Triclopyr butoxy	32	Canyon	metsulfuron	20	Hextar Cyper	Cypermethrin	5.50	Complied
Pesticides	Active ingredient	Ai (%)													
Tri-Esther 32	Triclopyr butoxy	32													
Canyon	metsulfuron	20													
Hextar Cyper	Cypermethrin	5.50													

		<table border="1"> <tr> <td>Racumin Wax Block</td> <td>coumatetralyl</td> <td>0.0375</td> </tr> <tr> <td>Ebor 401</td> <td>bromadiolone</td> <td>0.0375</td> </tr> <tr> <td>Tarang</td> <td>glufosinate ammonium</td> <td>0.0050</td> </tr> <tr> <td>Ancom Sodium Chlorate</td> <td>sodium chlorate</td> <td>98.00</td> </tr> <tr> <td>Supremo</td> <td>glyphosate isopropylammonium</td> <td>41.00</td> </tr> </table> <p>A records of pesticides usage were sighted and maintained for FY 2021 and FY2022 with area treated and application as required.</p>	Racumin Wax Block	coumatetralyl	0.0375	Ebor 401	bromadiolone	0.0375	Tarang	glufosinate ammonium	0.0050	Ancom Sodium Chlorate	sodium chlorate	98.00	Supremo	glyphosate isopropylammonium	41.00	
Racumin Wax Block	coumatetralyl	0.0375																
Ebor 401	bromadiolone	0.0375																
Tarang	glufosinate ammonium	0.0050																
Ancom Sodium Chlorate	sodium chlorate	98.00																
Supremo	glyphosate isopropylammonium	41.00																
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>	The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5 to minimize and eliminated where possible accordance to IPM plans.	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>	No evidence of prophylactic use of pesticides in the estates visited as per Register of Chemicals Hazardous to Health dated 01/01/2021.	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> <p>a) Judgment of the threat and verify why this is a major threat</p> <p>b) Why there is no other alternative which can be used</p>	As stated in Sime Darby Plantation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter stated commitment to protect and disclose environmental impacts and minimise resource use. Sime Darby Plantation will implement integrated pest management programs, with no use of paraquat or chemicals classed as hazardous under the WHO 1A and will phase out the WHO 1B and those additional chemicals listed in the Stockholm or Rotterdam Conventions.	Complied															

	<p>c) Which process was applied to verify why there is no other less hazardous alternative</p> <p>d) What is the process to limit the negative impacts of the application</p> <p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>		
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Training for pesticide handler/sprayers were conducted as training record from Mycrop for Bukit Puteri Estate (B Division) on 04/05/21 which attended by 9 Spray Operator, mandore, staff, MA and Assistant Manager.</p> <p>Observed in Pesticides wash room and Emergency Shower area, the improvement can be made for waste water that exposed to chemicals that have potential run off through an outlet to a drain and to surrounding area. Refer to SDS for Glyphosate-isopropylammonium (Supremo) dated rev. 27/03/19 under Section 13 Disposal Consideration stated: Do not flush to surface water or sanitary sewer water system. Another one Alion date rev. 23/06/18 which highly toxic to aquatic live and in Section 16 Accidental Release Measure stated do not let a disperse to water surface, drain or underground water. Hence, an OFI has been raised on the matter.</p> <p>Sighted in CAPEX FY 2022 Bukit Puteri Estate has a plan to upgrade the facility of Chemical Pre-Mixing Area (16 ft X 25 ft) 400 S/foot costing RM 72,000. To further make arrangement of implementing the plan of upgrading the facility to further improve mitigation of chemicals disperse to water surface, drain or underground water.</p>	OFI
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Sampled Chemical Store in Bukit Puteri Estate, found well ventilated, lock, banded and allocated with spill kit, SDS maintained</p>	Complied

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

		with 5 years revision. Sighted clear signages with chart of pesticides class and color band codes.	
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	Pesticides containers as sampled in Scheduled Waste Store under SW 409 found properly labelled and clearly stated the generation date 13/12/21. Others found properly managed and disposed.	Complied
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	No aerial spray activities conducted in Bukit Puteri Estate as explained and interview conducted with sprayers during site visit.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	Medical surveillance was conducted for chemicals/pesticides handlers and operators as Medical Surveillance report 2021 as reported by Clinic Chung, Kuala Lipis on 28/04/21. Covering: <ul style="list-style-type: none"> • 3 Mixing Operator-pesticides (organophosphates, glyphosate, triclopyr, cypermethrin, dimethylamine) • 1 Fogging Operators -(organophosphates) • 1 Workshop Operators-maganese, mineral oils. • Results showing no sign of ill effects and fit to work. For FY 2022 sighted a letter from Sr. Estate of Bukit Puteri Estate to Clinic Chung dated 26/02/22. List of workers for Medical Surveillance 2022-Bukit Puteri Estate (appendix 1) attached. 44 workers comprise of Store Clerk, Workshop, Fogging, sprayers/manurers, mandore sprayers, mandore manuring, rat bait, rait bait mandore.	Complied
7.2.11	(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.	Sampled list of workers of Bukit Puteri Estate 2022 found no person under age of 18 employed. No pregnant or breastfeeding women	Complied

	- Critical (Major) compliance -	engaged with pesticides operation as sampled with sprayers and manurers.	
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. - Minor compliance -	Waste Management Plan 2022 SOU 10 Bukit Puteri Estate was documented and implemented as sampled containing: <ul style="list-style-type: none"> • Scheduled Waste (Lubricant-SW 306, Empty Pesticides Container-SW 409, Contaminated Filter/Rag-SW 410. • Domestic Waste (Rubbish from line site, office, workshop, store, shop) • Recycle Waste (EFB, empty container) • Clinical Waste (Syringe-SW 404) In Bukit Puteri POM, Waste Management Action Plan FY 2022 established and documented included: <ul style="list-style-type: none"> • Scheduled Waste (Used battery, Lubricant oil, Used rags, Oil filters, Used Lab chemicals, solvent) • Domestic Waste (Rubbish from line site, office, workshop, store, shop) and Sewage (Septic Tank). • Recycle Waste (Scrap iron) Action to be taken clearly identified for each type of waste with responsible person incharge.	Complied
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	General view from visit at site as in housing and landfill found acceptable with allocation of waste bins, proper management of waste.	Complied
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	As observed during site visit in housing and landfill and field found no use open fire for disposal. In Bukit Puteri POM sighted Inventory of Scheduled Waste for month of April 2022.	Complied

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

No.	SW Code	Wate Name	Balance (MT)	Qty Generated (MT)
1.	SW 102	Spent Batteries	0.00	0.00
2.	SW 110	Spent Electrical/Electronics	0.00	0.00
3.	SW 305	Spent Lubricating Oil	0.00	0.00
4.	SW 306	Spent Hydraulic Oil	0.914	0.00
5.	SW 322	Spent Hexane/IPA	0.947	0.228
6.	SW 409	Spent Bags/Containers/Equipment	0.0760	0.0160
7.	SW 410	Spent Rags/Oils/Filters	0.0430	0.00

Sighted available and consistently maintained an inventory for month of March, February, January (2022), December, November, October (2021) as verified. Sighted:

- Consignment Note No. 2021102916WMQ1BD for disposal of SW 409 Spent Carboy (Containers/Bags/Equipment) on 29/10/21 to Kualiti Alam S/B (0.0920 MT)
- Consignment Note No. 2021102916FLQREO for disposal of SW 410 Spent Rags, Oil filters, plastics, papers on 29/10/21 to Kualiti Alam SB (0.0547 MT)

		<ul style="list-style-type: none"> Consignment Note No. 2021102916R36SQ7 for disposal of SW 322 Spent Hexane/IPA on 29/10/21 to Kualiti Alam SB (0.2090 MT) 	
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>Sampled good agriculture practices which follows the Group Agriculture Manual which included Standard Operating Procedures to Ensure Soil Fertility is managed to a level that ensures optimal and sustained yield. The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents;</p> <ul style="list-style-type: none"> EQMS chapter B8 - Leguminous Cover Crops EQMS chapter B14 – Manuring <p>ARM Section 8 – Manuring</p>	Complied
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>As sampled in Bukit Puteri Estate, the Plant Nutrition and Protection Unit (PNU) of Sime Darby Plantation has prepared annual fertilizer recommendation base leaf analysis result. Leaf analysis show the nutrient level was used as the guidance for the recommendation. As per company SOP, the soil sampling analysis carried at 5 years interval. The leaf analysis and soil analysis report was made available for review. Latest soil analysis was conducted on 25/03/2019 as per test report no. S44/2019. Latest leaf sampling analysis was carried out in March 2020. The report was stated in the 2020/21 Agronomic and Fertilizer Recommendations Report dated 26/08/2020.</p>	Complied
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>The nutrient recycling strategy is in place and includes use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. The strategy as follows:</p> <ul style="list-style-type: none"> EFB applied at selected fields at the estates. 	Complied

		<ul style="list-style-type: none"> • Fibre and POM were use as compost material. • Palm residues after planting were left in the biomass row to decompose. <p>Sighted the sampled records for EFB application FY 2021 and 2022 in a record book maintained by Bukit Puteri Estate.</p>	
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Bukit Puteri Estate has maintained the records of fertilizer application as per recommendation by the agronomist. Observed application records as per agronomist recommendation. In 2022 as plan from Jan-June:</p> <p>Immature (Field 2020A & 2020B)</p> <p>February 2022 (CCM45): 25,978 Kgs</p> <p>May 2022 (CCM45): 30,308 Kgs</p> <p>Mature</p> <p>Division A: NKC (77)</p> <p>Division B</p>	Complied
<p>Criterion 7.5: Practices minimise and control erosion and degradation of soils.</p>			
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Maps identifying marginal and fragile soil, including steep terrain were available for verification. They were prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. No fragile soil identified in the estate. Among the soil series identified were:</p> <ul style="list-style-type: none"> • Chat (77.51%), • Bungor (8.18%), • Tebok (4.64%), • Gajah Mati (2.65%), • Gong Chenak (2.63%), • Kuala Brang (1.81%), 	Complied

		<ul style="list-style-type: none"> • Kerayong (1.03%), • Gol (0.84%) and Kuah (0.73%). 	
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Sime Darby has established Slope and River Protection Policy signed by the Managing Director dated 15/1/2015. In the policy clearly stated that:</p> <ul style="list-style-type: none"> • Slope of >25° must be excluded from any new planting development and replanting program. • Slope of 10°. Fields are established with cover crops such as mucuna and soft grasses and ferns. <p>Observed no replanting on steep slopes after the date of the policy and as sighted during site visit verification.</p>	Complied
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	No new planting conducted at all estates visited	Complied
<p>Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>			
7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>Soil series and topography map available for both estates visited. No fragile soil categorized in the estates visited as per soil map issued by R&D Precision Agriculture Unit. As sighted in Bukit Puteri Estate, the estate have taken into account the land terrain, drainage and road systems in planning the 2022 replanting.</p>	Complied
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest: "We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through: vii. No new development of peat areas, regardless</p>	Complied

		of depth or location. We will seek to rehabilitate existing plantings on peats where possible.	
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	The R&D Precision Agriculture conducted assessment and provided the Bukit Puteri Estates with Slop & Contour maps dated August 2014. Sampled topography information as follows: <ul style="list-style-type: none"> • 0-2 degree (9.07%) • 2-6 degree (29.68%) • 6-12 degree (35.81%) • 12-20 degree (22.50%) • 20-25 degree (2.51%) • >25 degree (0.43%) 	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	No planting on peat in the estate as no peat identified as per Soil Map prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. Thus, this indicator is not applicable.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	No planting on peat in the estate as no peat identified as per Soil Map prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. Thus, this indicator is not applicable.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	No planting on peat in the estate as no peat identified as per Soil Map prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. Thus, this indicator is not applicable.	Not Applicable

7.7.4	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	<p>No planting on peat in the estate as no peat identified as per Soil Map prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. Thus, this indicator is not applicable.</p>	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>No planting on peat in the estate as no peat identified as per Soil Map prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. Thus, this indicator is not applicable.</p>	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>No planting on peat in the estate as no peat identified as per Soil Map prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. Thus, this indicator is not applicable.</p>	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p>	<p>No planting on peat in the estate as no peat identified as per Soil Map prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. Thus, this indicator is not applicable.</p>	Not Applicable

- Critical (Major) compliance -																																							
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.																																							
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>SOU 10 certification unit had established its Water Management Plan for year 2022 which was developed to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. Government water is supplied to all housing within the certification unit. Own treated water was also used to support for any shortage of supply. Bukit Puteri POM established Water Management Plan FY 2022.</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Water Sources</th> <th>Usage</th> <th>Monitoring & Measurement</th> <th>Fequency</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Water catchment pond</td> <td>Mill processing & Office</td> <td> <ul style="list-style-type: none"> Flow meter records at WTP Water Quality monitoring by lab. </td> <td>Daily</td> <td>Lab Supervisor</td> </tr> <tr> <td>2.</td> <td>Perbadangan Pengurusan Air Pahang</td> <td>Domestic usage</td> <td> <ul style="list-style-type: none"> Flow meter records at overhead tank Water quality monitoring by KKM. </td> <td></td> <td>Lab Supervisor</td> </tr> </tbody> </table> <p>As sampled in Bukit Puteri POM water analysis test result for domestic water-treated water as sampled below:</p> <table border="1"> <thead> <tr> <th>Date Sampled</th> <th>pH (25°C)</th> <th>TDS (mg/L)</th> <th>Turbidity (NTU)</th> <th>Chloride (mg/L)</th> <th>Al (mg/L)</th> </tr> </thead> <tbody> <tr> <td>17/02/22</td> <td>7.5</td> <td>148</td> <td>6.8</td> <td>18</td> <td>0.293</td> </tr> <tr> <td>20/01/22</td> <td>7.7</td> <td>108</td> <td>4.3</td> <td>18.20</td> <td>ND</td> </tr> </tbody> </table>	No.	Water Sources	Usage	Monitoring & Measurement	Fequency	PIC	1.	Water catchment pond	Mill processing & Office	<ul style="list-style-type: none"> Flow meter records at WTP Water Quality monitoring by lab. 	Daily	Lab Supervisor	2.	Perbadangan Pengurusan Air Pahang	Domestic usage	<ul style="list-style-type: none"> Flow meter records at overhead tank Water quality monitoring by KKM. 		Lab Supervisor	Date Sampled	pH (25°C)	TDS (mg/L)	Turbidity (NTU)	Chloride (mg/L)	Al (mg/L)	17/02/22	7.5	148	6.8	18	0.293	20/01/22	7.7	108	4.3	18.20	ND	Complied
No.	Water Sources	Usage	Monitoring & Measurement	Fequency	PIC																																		
1.	Water catchment pond	Mill processing & Office	<ul style="list-style-type: none"> Flow meter records at WTP Water Quality monitoring by lab. 	Daily	Lab Supervisor																																		
2.	Perbadangan Pengurusan Air Pahang	Domestic usage	<ul style="list-style-type: none"> Flow meter records at overhead tank Water quality monitoring by KKM. 		Lab Supervisor																																		
Date Sampled	pH (25°C)	TDS (mg/L)	Turbidity (NTU)	Chloride (mg/L)	Al (mg/L)																																		
17/02/22	7.5	148	6.8	18	0.293																																		
20/01/22	7.7	108	4.3	18.20	ND																																		

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

		<table border="1"> <tr> <td>23/12/21</td> <td>6.9</td> <td>140</td> <td>2.2</td> <td>26.70</td> <td>ND</td> </tr> <tr> <td colspan="6" style="text-align: center;">Domestic Water-Housing</td> </tr> <tr> <td>Standard</td> <td>6.6-9.0</td> <td>1000</td> <td>5</td> <td>250</td> <td>0.2</td> </tr> <tr> <td>17/02/22</td> <td>7.6</td> <td>160</td> <td>4.6</td> <td>18</td> <td>0.088</td> </tr> <tr> <td>25/01/22</td> <td>7.7</td> <td>112</td> <td>5.3</td> <td>18.0</td> <td>0.025</td> </tr> <tr> <td>23/12/21</td> <td>6.9</td> <td>128</td> <td>1.9</td> <td>28.0</td> <td>ND</td> </tr> </table> <p>Bold: Not conform to NSDWQ for domestic use.</p> <p>Drinking water sampling:</p> <table border="1"> <thead> <tr> <th></th> <th>Total Coliform (MPN/100mL)</th> <th>E.coli (MPN/100m/L)</th> </tr> </thead> <tbody> <tr> <td>Date Sampled</td> <td>Absent in 100 mL sample</td> <td>Absent in 100 mL sample</td> </tr> <tr> <td>22/02/22</td> <td>ND(<2)</td> <td><2</td> </tr> <tr> <td>25/01/22</td> <td>ND(<2)</td> <td>ND(<2)</td> </tr> <tr> <td>29/12/21</td> <td>ND(<2)</td> <td>ND(<2)</td> </tr> </tbody> </table> <p>Conform to NSDWQ for domestic use.</p> <p>Sampled related SOP for Water Quality Monitoring.</p>	23/12/21	6.9	140	2.2	26.70	ND	Domestic Water-Housing						Standard	6.6-9.0	1000	5	250	0.2	17/02/22	7.6	160	4.6	18	0.088	25/01/22	7.7	112	5.3	18.0	0.025	23/12/21	6.9	128	1.9	28.0	ND		Total Coliform (MPN/100mL)	E.coli (MPN/100m/L)	Date Sampled	Absent in 100 mL sample	Absent in 100 mL sample	22/02/22	ND(<2)	<2	25/01/22	ND(<2)	ND(<2)	29/12/21	ND(<2)	ND(<2)	
23/12/21	6.9	140	2.2	26.70	ND																																																	
Domestic Water-Housing																																																						
Standard	6.6-9.0	1000	5	250	0.2																																																	
17/02/22	7.6	160	4.6	18	0.088																																																	
25/01/22	7.7	112	5.3	18.0	0.025																																																	
23/12/21	6.9	128	1.9	28.0	ND																																																	
	Total Coliform (MPN/100mL)	E.coli (MPN/100m/L)																																																				
Date Sampled	Absent in 100 mL sample	Absent in 100 mL sample																																																				
22/02/22	ND(<2)	<2																																																				
25/01/22	ND(<2)	ND(<2)																																																				
29/12/21	ND(<2)	ND(<2)																																																				
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p>	<p>Bukit Puteri Estate has been protecting 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</p>	Complied																																																			

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

	- Critical (Major) compliance -	Management (Management of River Reserve in Sime Darby Plantation dated April 2014).																																											
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 "Compliance Schedule", license no. 004160 (license period 1/7/20 – 30/06/21). Sighted quarterly report has been submitted to DOE by quarterly basis. Latest submission for to DOE on 14/1/21 for period October to December 2020. Latest monthly analysis done by Sime Darby Plantation Research Sdn Bhd for Nov 2021-Feb 2022 summarized as per below at Final Discharge-water course:</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th>Month (Sampled Date)</th> <th>pH (25°C)</th> <th>BOD (mg/L)</th> <th>SS (mg/L)</th> <th>TN (mg/L)</th> <th>AN (mg/L)</th> <th>O&G (mg/L)</th> </tr> </thead> <tbody> <tr> <td>17/02/22</td> <td>8.6</td> <td>23</td> <td>110</td> <td>36</td> <td><1</td> <td>4</td> </tr> <tr> <td>20/01/22</td> <td>8.7</td> <td>65</td> <td>170</td> <td>76</td> <td>54</td> <td>5</td> </tr> <tr> <td>16/12/21</td> <td>8.1</td> <td>60</td> <td>160</td> <td>118</td> <td>16</td> <td>4</td> </tr> <tr> <td>23/11/21</td> <td>7.9</td> <td>57</td> <td>120</td> <td>115</td> <td>31</td> <td>15</td> </tr> <tr> <td>Standard</td> <td>9-5</td> <td>100</td> <td>400</td> <td>200</td> <td>150</td> <td>50</td> </tr> </tbody> </table>	Month (Sampled Date)	pH (25°C)	BOD (mg/L)	SS (mg/L)	TN (mg/L)	AN (mg/L)	O&G (mg/L)	17/02/22	8.6	23	110	36	<1	4	20/01/22	8.7	65	170	76	54	5	16/12/21	8.1	60	160	118	16	4	23/11/21	7.9	57	120	115	31	15	Standard	9-5	100	400	200	150	50	Complied
Month (Sampled Date)	pH (25°C)	BOD (mg/L)	SS (mg/L)	TN (mg/L)	AN (mg/L)	O&G (mg/L)																																							
17/02/22	8.6	23	110	36	<1	4																																							
20/01/22	8.7	65	170	76	54	5																																							
16/12/21	8.1	60	160	118	16	4																																							
23/11/21	7.9	57	120	115	31	15																																							
Standard	9-5	100	400	200	150	50																																							
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis with the latest recording detailed sampled (water usage per MT in 2021 and 2022 of fresh fruit bunches (FFB) below:</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th>Month</th> <th>Water Usage (m3)</th> <th>FFB Processed (MT)</th> <th>Ratio of Water Used/FFB Processed</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Month	Water Usage (m3)	FFB Processed (MT)	Ratio of Water Used/FFB Processed					Complied																																		
Month	Water Usage (m3)	FFB Processed (MT)	Ratio of Water Used/FFB Processed																																										

	Jan	5,910	3,778.56	1.56
	Feb	5,702	3,452.06	1.65
	Mac	8,792	5,259.72	1.67
	Apr	12,076	6,282.81	1.92
	May	11,869	6,121.35	1.94
	Jun	12,009	6,536.70	1.83
	Jul	11,821	6,329.49	1.87
	Aug	15914	8,247.27	1.93
	Sep	11965	5,709.94	2.10
	Oct	12987	7,033.82	1.85
	Nov	1,373	706.47	1.94
	Dec	9,784	5,322.52	1.84

Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised

7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and documented under Environmental Management Plan SOU 10 Period 2022 contained plan to enhance efficiency of usage of non-renewable energy and renewable energy for transportation and vehicle in estate operation. Sampled Monitoring of Diesel Use Per Ton FFB for Bukit Puteri Estate 2021. Total used 88,467 Litres, FFB Produced 47,831 MT and Diesel Usage per FFB Produced 1.97. While in 2022, the monitoring data available from January-March. Sighted in Bukit Puteri POM a Monitoring Diesel Use per Tonne of FFB FY 2021 in monthly basis (Jan-Dec). Total of 8,797 Litres. FFB</p>	Complied
-------	--	---	----------

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

		Processed was 64,794.72 MT. Total of Diesel used per tonne FFB processed was 0.14.	
Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	(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. - Critical (Major) compliance -	GHG emission identified and assessed as reported using the RSPO PalmGHG.	Complied
7.10.2	(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). - Critical (Major) compliance -	There is no new development area in this certification unit. Other source of emission for assisting operation is reported using the RSPO PalmGHG.	Complied
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -	Sighted from Environmental Management Plan SOU 10 Period FY 2022 which link to maintain effectiveness of EAI/EIE. Plan to reduce and minimize covering usage of diesel for vehicles and transportation, pesticides for spraying activity, usage of water, waste disposal (domestic and schedule waste). In Bukit Puteri POM sighted Environmental Improvement Plan FY 2022. Among included: <ul style="list-style-type: none"> • Water Pollution • Air Pollution • High Water Usage • High Boiler Fuel Consumption Mitigation measures for each issues were clearly planned with PIC and time frame for completion in December 2022.	Complied

Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	No new planting in SOU 10 Bukit Puteri, there was no land preparation of existence or new planting in Bukit Puteri Estate by burning ever since Sime Darby Plantation practiced zero burning as per the policy stated in: <ul style="list-style-type: none">EQMS-SOP- Section B2 - Under felling/clearing & land preparation Carbon Policy	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Fire prevention and control measures has been established based on SDP Zero Burning Policy and Fire Prevention and Control Measures by GSQM.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Based on the last stakeholder meeting minute dated 29/03/22, fire prevention and control measures presented to the stakeholders. Adjacent stakeholders as attendance list that included Penghulu Mukim, Tok Empat Sg. Ular, LKPP Corporation. Sighted copy of the minutes dated 04/04/22 signed received by Ketua Balai Polis Ladang Tungku, Kampung Lubuk Kulit, Kampung Belitik, Kg Keledak.	Complied
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -	As verified with estate representative, no new development within SOU10 Bukit Puteri certification unit. The development was done back in 1983 by the previous company which now under Sime Darby Plantation Berhad.	Complied
7.12.2	(C) HCVs, HCS forests and other conservation areas are identified as follows:	SOU 10 Bukit Puteri has conducted a High Conservation Value (HCV) re-assessment which was carried out for Pahang Zone by PSQM	Complied

	<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). - Critical (Major) compliance -</p>	<p>Department which cover for 3 SOUs (SOU10 Bukit Puteri, SOU11 Kerdu and SOU12 Jabor). Sighted a Report version II dated March 2016. HCV area within SOU10 area in Bukit Puteri with total HCV Area with size of 21.36 Ha. such as: HCV 4: River Reserve (Sg. Telang)-17.77 Ha HCV 4: Water Catchment-2.81 Ha HCV 4: Pond-0.78 Ha</p>	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not Applicable	Not Applicable
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -</p>	No new planting after 15 November 2018 within SOU 10 Bukit Puteri.	Complied
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, 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.	No local communities have been identified in HCV areas, HCS forest after 15 November 2018 within SOU 10 Bukit Puteri.	Complied

	- Minor compliance -		
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>A programme to regularly educate the workforce about the status of RTE species is in place. Sighted Training Programme titled HCV Briefing to AP and Workers conducted on 26/02/22 as part of improvement to all Aps and Checkroll workers. Evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities were maintained and implemented. Signage was utilised as part of creating awareness among employees on the restriction of poaching/capturing/harming/collecting/killing the RTE species.</p>	Complied
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>HCV area, on-going monitoring was done on monthly basis. HCV management plan documented under Biodiversity Management Plan as part of Environmental Management Plan SOU 10 FY 2022. Action planned for competency and awareness training on how to manage HCV at estate (Management Implementation) by PSQM annually. Sighted a book titled HCV Monitoring which data started on 04/03/21 till 03/04/22.</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>As sampled and verified with representative of Bukit Puteri Estate, found no land clearing since without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018. Thus, this indicator is not applicable.</p>	Not Applicable

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2021 for Bukit Puteri Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2021 for Bukit Puteri Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.52
PKO	1.52

Extraction	%
OER	21.18
KER	4.35

Production	t/yr
FFB Process	64,770.72
CPO Produced	13,720.488
PKO Produced	2816.939

Land Use	Ha
OP Planted Area	14,316.42
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	0.00
Total	14,316.42

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	0.00	0.00	35,702.74	0.76	0.00	0.00	35,702.74	0.76
CO ₂ Emission from fertilizer	0.00	0.00	4,509.38	0.10	0.00	0.00	4,509.38	0.10
NO ₂ Emission	0.00	0.00	2,468.41	0.05	0.00	0.00	2,468.41	0.05
Fuel Consumption	0.00	0.00	155.54	0.00	0.00	0.00	155.54	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	0.00	0.00	-33,817.15	-0.72	0.00	0.00	-33,817.15	-0.72
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.00	0.00	9,018.93	0.19	0.00	0.00	9,018.93	0.19

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	12,696.16	0.20
Fuel Consumption	1.52	0.00
Grid Electricity Utilization	0.00	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	12,697.68	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

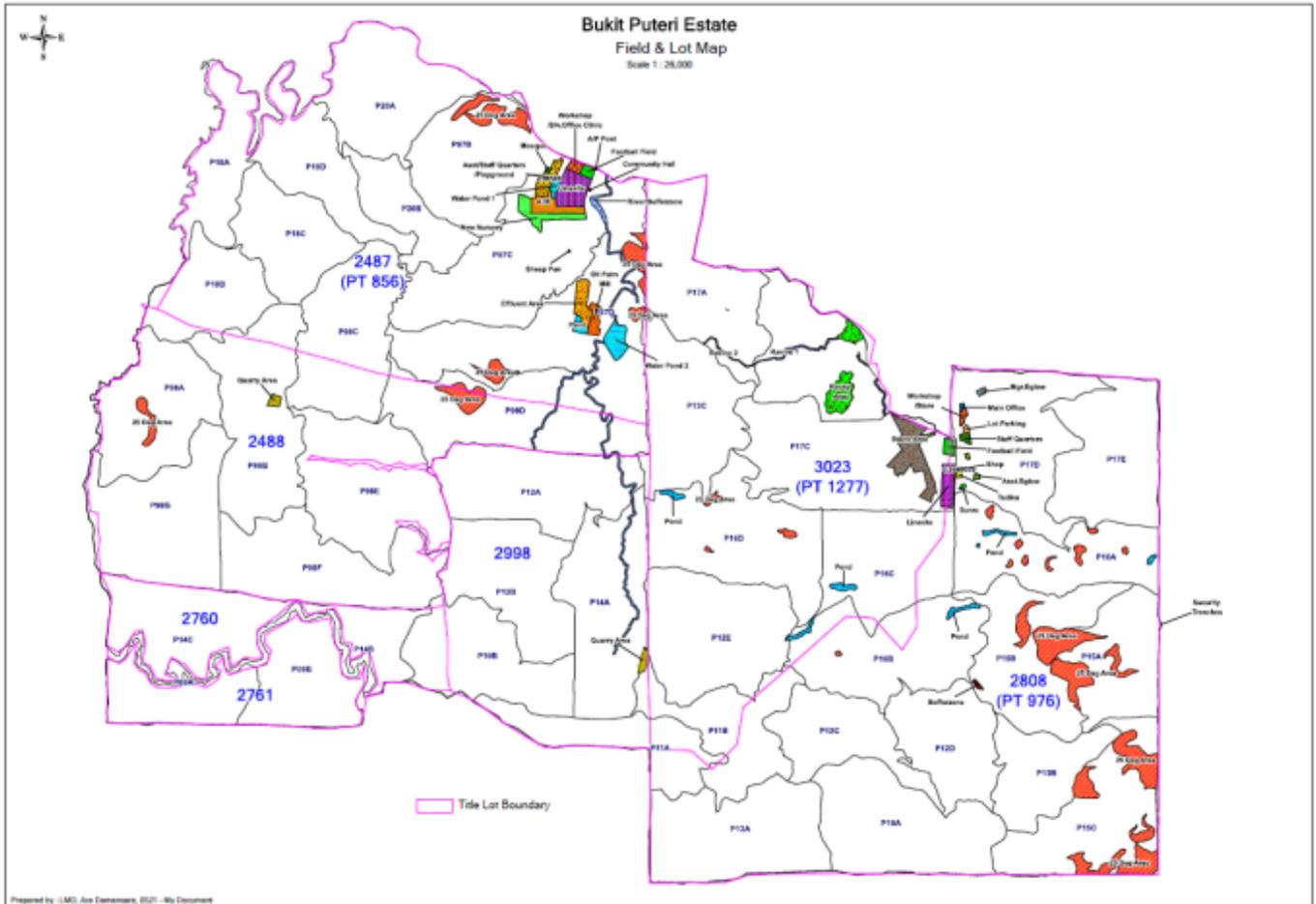
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0.00
Divert to anaerobic diversion (%)	100.00

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

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COBC	Code of Business Conduct
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
VCOBC	Vendor Code of Business Conduct