

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

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

<b>SIME DARBY PLANTATION BERHAD</b>
Client Company / Parent Company Address: Level 3A, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7 47301 Ara Damansara Selangor, Malaysia
Certification Unit: <b>Strategic Operating Unit (SOU 4) – Flemington Palm Oil Mill</b>
Location of Certification Unit: Lot 5138, Jalan Sg Dulang, Sungai Sumun, 36309 Teluk Intan, Perak, Malaysia
Date of Final Report: 17/11/2022

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## Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	Sime Darby Plantation Berhad		
<b>RSPO Membership Number</b>	1-0008-04-000-00	<b>Membership Approval Date</b>	07/09/2004
<b>Address</b>	Level 3A, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7 47301 Ara Damansara Selangor, Malaysia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Strategic Operating Unit (SOU 4) – Flemington Palm Oil Mill		
<b>Location / Address</b>	Lot 5138, Jalan Sg Dulang, Sungai Sumun, 36309 Teluk Intan, Perak, Malaysia		
<b>Website</b>	<a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a>		
<b>Management Representative</b>	Shylaja Devi Vasudevan Nair (Head, Sustainability Unit GSQM) Abd Ghafar Sulaiman (SOU 4 Representative)	<b>E-mail</b>	<a href="mailto:shylaja.vasudevan@simedarbyplantation.com">shylaja.vasudevan@simedarbyplantation.com</a> <a href="mailto:kks.flemington@simedarbyplantation.com">kks.flemington@simedarbyplantation.com</a>
<b>Telephone</b>	+(603) 78484379 +(605) 6489198 (Mill)	<b>Facsimile</b>	-

2. Certification Information			
<b>Certificate Number</b>	RSPO 590802	<b>Certificate Start Date</b>	05/10/2021
<b>Date of First Certification</b>	05/10/2011	<b>Certificate Expiry Date</b>	04/10/2026
<b>Scope of Certification</b>	Production of Palm Oil and Palm Kernel		
<b>Visit Objectives</b>	The objective of the assessment was to conduct an annual surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by Flemington POM and Supply Base's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives.		
<b>Assessment Cycle</b>	<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		
<b>Applicable Standards / Normative Reference</b>	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		

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<b>Supply Chain Module</b>	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	60 mt/Hour
<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 682042	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	08/02/2023
MSPO 690017	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3		08/02/2023
MSPO 714138	MSPO Supply Chain Certification: 2018		17/09/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Flemington POM	Lot 5138, Jalan Sg Dulang, Sungai Sumun, 36309, Teluk Intan, Perak	3° 55' 40.71" N	101° 51' 26.60" E
Flemington Estate	Location: Lot 4672, Ulu Bernam, 36500 Perak	3° 44' 57.76" N	101° 08' 51.93" E
Bagan Datoh Estate	Lot 3710, Bagan Datuk 36100 Perak	3° 45' 33.77" N	101° 00' 25.12" E
Sabak Bernam Estate	Lot 2094, Jalan Haji Suhaimi, 45307 Sabak Bernam, Selangor	3° 59' 33.72" N	101° 47' 24.66" E
Sungai Samak Estate	Lot 4541, Jln Simpang Empat- Bagan Datuk, 36309, Teluk Intan, Perak	3° 53' 27.53" N	101° 52' 50.43" E

5. Description of Supply Base					
<b>New Planting Development</b>	<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
Flemington Estate	1,693.81	7.38	205.65	1,906.84	88.81
Bagan Datoh Estate	3,574.83	2.00	205.03	3,781.86	93.32
Sabak Bernam Estate	2,344.36	1.24	166.19	2,511.79	93.35
Sungai Samak Estate	2,766.43	7.81	251.50	3,025.74	91.65
<b>Total</b>	<b>10,379.43</b>	<b>18.43</b>	<b>828.37</b>	<b>11,226.23</b>	

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<b>6. Plantings &amp; Cycle</b>						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Flemington	400.35	875.11	418.35	-	1,293.46	400.35
Bagan Datoh Estate	640.89	2431.23	198.75	303.96	2,933.94	640.89
Sabak Bernam Estate	-	833.98	1,176.12	756.33	2,766.43	-
Sungai Samak Estate	551.44	1737.46	55.46	-	1,792.92	551.44
<b>Total (ha)</b>	<b>1,592.68</b>	<b>5,877.78</b>	<b>1,848.68</b>	<b>1,060.29</b>	<b>8,786.75</b>	<b>1,592.68</b>

<b>7. Summary of Certified Tonnage of FFB (Own Certified Scope)</b>				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 21 – Sept 22)	Actual (July 2021 – July 2022)		Forecast (Oct 22 – Sept 23)
		Previous license period (July 21 – Sept 21)	Current license period (Oct 21 – July 22)	
Flemington Estate	37,941.00	7,357.88	21,579.67	41,610.81
Bagan Datuk Estate	77,405.00	10,803.57	33,453.27	52,198.00
Sungai Samak Estate	68,488.71	15,784.73	31,803.95	49,092.16
Sabak Bernam Estate	51,000.00	7,545.82	23,608.82	76,685.80
<b>Total</b>	<b>234,834.71</b>	<b>151,937.71</b>		<b>219,586.77</b>

<b>8. Summary of Certified Tonnage of FFB (from other certified unit(s))</b>				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 21 – Sept 22)	Actual (July 2021 – July 2022)		Forecast (Oct 22 – Sept 23)
		Previous license period (July 21 – Sept 21)	Current license period (Oct 21 – July 22)	
Seri Intan		-	138.960	
Sabrang		240.620	596.27	
Sungai Wangi		3,512.87	176.57	
Sogomana		2,280.52	237.12	
Sg.Buloh		875.45	-	
Bukit Talang		603.24	-	
<b>Total</b>		<b>8,661.62</b>		

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<b>9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 21 – Sept 22)	Actual (July 2021 – July 2022)		Forecast (Oct 22 – Sept 23)
		Previous license period (July 21 – Sept 21)	Current license period (Oct 21 – July 22)	
Kuala Perak	-	229.165	-	-
<b>Total</b>	-	<b>229.165</b>	-	-

<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	July 2021	17,291.61	229.165	17,520.77
2	August 2021	15,164.75	-	15,164.75
3	September 2021	16,548.34	-	16,548.34
4	October 2021	11,875.58	-	11,875.58
5	November 2021	11,674.80	-	11,674.80
6	December 2021	12,112.04	-	12,112.04
7	January 2022	7,104.75	-	7,104.75
8	February 2022	12,718.30	-	12,718.30
9	March 2022	14,618.74	-	14,618.74
10	April 2022	12,331.35	-	12,331.35
11	May 2022	10,397.77	-	10,397.77
12	June 2022	6,202.23	-	6,202.23
13	July 2022	12,559.07	-	12,559.07
	<b>TOTAL</b>	<b>160,599.33</b>	<b>229.165</b>	<b>160,828.49</b>

<b>10. Summary of Certified Tonnage (MT) (not applicable for ISS)</b>			
Estimated last year (Oct 21 – Sept 22)	Actual (July 2021 – July 2022)		Forecast (Oct 22 – Sept 23)
	Previous license period (July 21 – Sept 21)	Current license period (Oct 21 – July 22)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
234,834.71 mt	49,004.70 mt	111,594.63 mt	219,586.77 mt
	<b>TOTAL</b>	160,599.33 mt	
<b>CPO (OER: 21.15 %)</b>	<b>CPO (OER: 20.04 %)</b>		<b>CPO (OER: 20.42 %)</b>

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49,667.55 mt	8,267.31 mt	21,992.03 mt	44,839.62 mt
	<b>TOTAL</b>	30,259.34 mt	
<b>PK (KER: 4.75 %)</b>	<b>PK (KER: 4.54 %)</b>		<b>PK (KER: 4.78 %)</b>
11,154.65 mt	1,905.90 mt	4,993.05 mt	10,496.25 mt
	<b>TOTAL</b>	6,898.95 mt	

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	July 2021	3,509.62	828.51
2	August 2021	1,287.26	299.43
3	September 2021	3,470.42	777.96
4	October 2021	2,522.90	516.70
5	November 2021	2,419.21	498.58
6	December 2021	2,463.36	536.97
7	January 2022	1,234.64	271.91
8	February 2022	2,606.52	583.50
9	March 2022	2,827.23	665.86
10	April 2022	2,443.56	623.65
11	May 2022	1,839.47	437.07
12	June 2022	997.17	247.34
13	July 2022	2,637.96	611.49
<b>TOTAL</b>		<b>30,259.33</b>	<b>6,898.95</b>

11. Summary of Actual Volume sold					
Current License period (Oct 2021 – Jul 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	10,278.58	-	-	11,141.58	21,420.16
<b>PK (MT)</b>	4,976.98	-	-	-	4,976.98
<b>Credits</b>	-	-	-	-	-
Previous License period (July 2021 – Sept 2021)					
<b>CPO (MT)</b>	-	-	-	4,499.42	4,499.42
<b>PK (MT)</b>	307.45	-	-	634.25	941.70
<b>Credits</b>	-	-	-	-	-

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**Note:**

1. 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.	XXX	P/XXX/XXXX/CPOXXXX	3,3414.03	-
2.	XXX	P/XXX/XXXX/CPOXXXX	6,864.55	-
3.	XXX	P/XXX/XXXX/PKXXXXX	-	5,284.43
<b>TOTAL</b>			<b>10,278.58</b>	<b>5,284.43</b>

**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)
-	-	-	-	-
-	-	-	-	-
<b>TOTAL</b>				

**11C. Records of CPO & PK Sold as conventional since the last audit (if any)**

No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	AAA	5,332.40	199.90
2	BBB	5,213.29	174.28
3	CCC	5,095.31	260.07
<b>TOTAL</b>		<b>15,641.00</b>	<b>634.25</b>

**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
-	-	-	-
-	-	-	-
<b>TOTAL</b>			<b>-</b>

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12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Oct 21 – Sept 22)			Actual (July 2021 – July 2022)			Forecast (Oct 22 – Sept 23)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			-			-			-
IS-CSPO	-	-		-	-		-	-	
IS-CSPKO	-	-		-	-		-	-	
IS-CSPKE	-	-		-	-		-	-	
CSPK	-	-		-	-		-	-	

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

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
<b>Current License period (Oct 2021 – July 2022)</b>							
Credits				-	-	-	-
Physical	-	-	-				
<b>Previous License period (July 2021 – Sept 2021)</b>							
Credits				-	-	-	-
Physical	-	-	-				

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)
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
<b>TOTAL</b>							

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: Dr Chaipayorn Seekao ([Chaipayorn.Seekao@bsigroup.com](mailto:Chaipayorn.Seekao@bsigroup.com))

Website: [www.bsigroup.com](http://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 **15/08/2022 – 19/08/2022**. 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 on **07/10/2022 & 03/11/2022**. The audit programs are included in Section 2.3.

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

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

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each 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.

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

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification2)</b>	<b>Year 2 (ASA 2_1)</b>	<b>Year 3 (ASA 2_2)</b>	<b>Year 4 (ASA 2_3)</b>	<b>Year 5 (ASA 2_4)</b>
Flemington POM	✓	✓	✓	✓	✓
Flemington Estate	✓	✓	✓	✓	✓
Bagan Datoh Estate	✓	✓	✓	✓	✓
Sabak Bernam Estate	✓	✓	✓	✓	✓
Sungai Samak Estate	✓	✓	✓	✓	✓

**Tentative Date of Next Visit: August 14, 2023 - August 18, 2023**

**Total Number of Mandays: 15 Mandays**

**2.2 BSI Assessment Team**

<b>Name</b>	<b>Role</b>	<b>Competency</b>
Vijay Kanna Pakirisamy (VKP)	Team Leader	<p><b>Education:</b> Bachelor’s Degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010.</p> <p><b>Work Experience:</b> He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad prior to joining BSI as a Client Manager.</p> <p><b>Training attended:</b> He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, Endorsed RSPO P&amp;C Lead Auditor Course in October 2019, Endorsed RSPO SCCS Lead Auditor Course in August 2020, Endorsed MSPO Lead Auditor Course in November 2019 and attended SMETA Requirements Training in April 2021.</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of Occupation Health Safety requirement, HIRARC, training, GAP and RSPO supply chain requirements.</p> <p><b>Language proficiency:</b></p>

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		He is fluent in English, Bahasa Malaysia, Tamil languages.
Mohamed Hidhir bin Zainal Abidin (MHZ)	Team Member	<p><b>Education:</b> He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006.</p> <p><b>Work Experience:</b> He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He had been involved in RSPO auditing since May 2012 for various companies in Malaysia.</p> <p><b>Training attended:</b> ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO P&amp;C and SCCS. Completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&amp;C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. Attended SMETA requirements training in April 2021.</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of legal, social, and stakeholder engagement.</p> <p><b>Language proficiency:</b> He is fluent in Bahasa Malaysia and English languages.</p>
Amir Bin Bahari (AB)	Team Member	<p><b>Education:</b> He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 &amp; Diploma in Palm Oil Milling Tech/Management MPOB 1996.</p> <p><b>Work Experience:</b> He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates.</p> <p><b>Training attended:</b> During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001, Endorsed RSPO P&amp;C Lead Auditor Course (2019) and HCV Auditing for RSPO &amp; MSPO course (2016)</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, Smallholders inclusion, legal requirements, environmental aspects and HCV requirements.</p> <p><b>Language proficiency:</b> He is fluent in both verbal/written in Bahasa Malaysia and English.</p>

**Accompanying Persons:**

Name	Role
-	-

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**1.3 Assessment Plan**

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

Date	Time	Subjects	VKP	MHZ	AB
Sunday, 14/08/2022	1500 - 1900	Auditors travel to Teluk Intan.	✓	✓	✓
Monday, 15/08/2022	0800 - 0900	Travel from Teluk Intan to <b>Sungai Samak Estate</b>	✓	✓	✓
	0900 - 0930	Opening Meeting: - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation).	✓	✓	✓
	0930 - 1230	<b>Sungai Samak Estate</b> 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.	✓	✓	✓
	1230 - 1330	LUNCH BREAK			
	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Tuesday, 16/08/2022	0900 - 1230	<b>Sabak Bernam Estate</b> 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.	✓	✓	✓
	1230 - 1330	LUNCH BREAK			

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	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder, workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Wednesday, 17/08/2022	0900 - 1230	<b>Flemington Palm Oil Mill</b> Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, Lab, weighbridge and palm product storage area, etc.	✓	✓	✓
	1000 - 1200	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	-	✓	-
	1230 - 1330	LUNCH BREAK			
	1330 - 1630	Document review P1 – P7: Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCCS general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
	Thursday, 18/08/2022	0900 - 1230	<b>Bagan Datoh Estate</b> 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.	✓	✓
1230 - 1330		LUNCH BREAK			

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	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder, workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Friday, 19/08/2022	0900 - 1230	<b>Flemington Estate</b> 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.	✓	✓	✓
	1230 - 1330	LUNCH BREAK			
	1330 - 1600	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder, workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1600 - 1630	Verify any Outstanding Issues and Preparation for Closing Meeting	✓	✓	✓
	1630 - 1700	Closing Meeting	✓	✓	✓

**Critical Non-Conformity Close Out Assessment Plan**

Date	Time	Subjects	VKP
Friday, 07/10/2022	0900 – 0930	Opening Meeting at <b>SOU 4 Flemington POM:</b> - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan	✓
	0930 – 1230	1. Verification on Critical NC: - 2235531-202208-M1 - 2235531-202208-M2 2. Site observation, workers interview 3. Document review – implemented evidence	✓
	1230 – 1300	Closing Meeting	✓

❖ Pending Document Evidence for Critical NC 2235531-202208-M1 was provided on 03/11/2022 and accepted by the auditor.

### Section 3: Assessment Findings

#### 3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	<p>Yes. SDP TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI):</p> <p><a href="http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations">http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</a></p>	Complied
<p>Have all the estates and mills certified within five (5) years after obtaining RSPO membership?</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021</p>	<p>Yes. All estates and mill has been certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate &amp; Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 1st Oct 2018, the mill has completed the selling off transaction.</p> <p>In Indonesia, PT Mitral Austral Sejahtera was sold and currently SDP have no control in the management.</p>	Complied
<p>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.</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.</p> <p><i>Note:</i></p>	<p>No. There is no new acquisitions as at latest TBP 2021.</p>	Complied

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<p>Any deviations from the maximum periods requires approval by the RSPO Secretariat.</p>	<p>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.</p>	<p>Complied</p>
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Yes.</p> <p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties was sold and currently Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019. Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate &amp; Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter:  <a href="http://www.rspo.org/certification/public-announcement">www.rspo.org/certification/public-announcement</a></p> <p>For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI):  <a href="http://www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations">www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations</a>.</p> <p>ACOP 2020 has been cross-referenced as below:  <a href="http://www.rspo.org/members/29">www.rspo.org/members/29</a></p>	<p>Complied</p>

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<p>Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised</p>	<p>Although there lapses has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised</p>	<p>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as these 2 assets were disposed.</p>	<p>Complied</p>
<p><b>Un-Certified Units or Holdings</b></p>		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&amp;C criterion 7.12.</p>	<p>Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units</p>	<p>Complied</p>
<p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification</p> <ol style="list-style-type: none"> <li>1. NBPOL (Poliamba Limited) 23/05/2020 – no comments  <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyplantation-berhad-nbpol-poliamba-limited">https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyplantation-berhad-nbpol-poliamba-limited</a></li> <li>2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments  <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-a-subsidiary-of-sime-darby-plantationbhd-guadalcanal-plain-palm-oil-ltd">https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-a-subsidiary-of-sime-darby-plantationbhd-guadalcanal-plain-palm-oil-ltd</a></li> <li>3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments  <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-ramuagri-industries-ltd">https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-ramuagri-industries-ltd</a></li> <li>4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments  <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-ramu-agri-industries-limited">https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-ramu-agri-industries-limited</a></li> <li>5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments  <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-higaturu-oil-palms">https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-higaturu-oil-palms</a></li> <li>6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO Website  <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamawan-png">https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamawan-png</a></li> </ol>	<p>Complied</p>

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	<p>7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO Website <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamendauen-png">https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamendauen-png</a></p> <p>8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-roka-mini-estate">https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-roka-mini-estate</a></p> <p>9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-j-estate">https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-j-estate</a></p> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-limited-higaturu-oil-palm">https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-limited-higaturu-oil-palm</a></p> <p>11. Sime Darby (Liberia) Plantation Inc 06/03/2012          – no comments captured in RSPO website <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc-new-planting-assessment">https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc-new-planting-assessment</a></p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012          – no comments captured in RSPO website <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment1">https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment1</a></p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012          – no comments captured in RSPO website <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment">https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment</a></p> <p>Management units for 11 – 13 above were disposed.</p>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria</p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as both sites was disposed.</p>	<p>Complied</p>

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<p>4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancy between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of 14/07/2021, 10 LUCAs were approved with 0 conservation liability and remaining 9 are still pending from RSPO.</p>	
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 4.2</p>	<p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>Sime Darby Plantation maintain corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&amp;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.</p>	<p>Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue are mainly awaiting for Land Titles. The last audit was conducted between July 2020 – August 2020.</p> <p>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.</p>	<p>Complied</p>
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&amp;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?</p>	<p>No any critical (Major) non-compliance raised against any of the RSPO P&amp;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.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company</p>	<p>Complied</p>

**3.2 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>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.</p>	<p>There is no scheme smallholders and/ or outgrowers included in the scope of certification.</p>	<p>Complied</p>

**Approved Time Bound Plan**

**SDP - RSPO Certification for Time Bound Plan - Malaysia Operations**

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

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

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

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

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

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

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

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

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

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		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						

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		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	-	

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	PT Indotruba Tengah	Sekunyr 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	-

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	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 – Nanggroe Aceh Darussalam	Certified	03/05/2013	-
		Tamiang (PT PPP) Estate						
		Batang Ara (PT PSK) Estate						
		Blang Simpo-01 Estate						
		Blang Simpo-02 Estate						
21	PT 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						

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		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 Two (2) Critical and Three (3) Minor nonconformities raised. The SOU 4 Flemington 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			
<b>NCR Ref #</b>	2235531-202208-M1	<b>Issued Date</b>	19/08/2022
<b>Due Date</b>	18/11/2022	<b>Closure Date</b>	03/11/2022
<b>Indicator &amp; Category (Critical / Minor)</b>	3.8.12 (Critical)		
<b>Statement of Nonconformity:</b>	Records does not tally with actual production, sales and carry forward volume.		
<b>Requirement Reference:</b>	Record keeping 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.		
<b>Objective Evidence:</b>	Flemington POM receives and processes only RSPO certified FFB. Therefore, it uses the Identity Preserved supply chain system. The records of all received FFB and deliveries of RSPO certified CPO and PK were not balanced and updated on a real time basis in the Mass Balance Sheet.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- To conduct briefing / training on new mass balance sheet to the PIC</li> <li>- To update mass balance sheet in accordance to RSPO palm trace system</li> </ul>		
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>- Mill using new mass balance sheet which provide by GSQM. Insufficient training on mass balance sheet.</li> <li>- Wrong data recorded in mass balance sheet during the initial transition from MB to IP.</li> </ul>		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- To conduct briefing / training on new mass balance sheet to the PIC on annual basis.</li> <li>- Monitoring of mass balance sheet on monthly basis and palm trace system</li> </ul>		
<b>Assessment Conclusion:</b>	<p><u>Critical Non-Conformity Close Out Verification.</u></p> <ol style="list-style-type: none"> <li>1. An RSPO SCCS Training &amp; New Balance Sheet Training has been conducted via Microsoft Teams by SDP SQM Department for the personals involved in supply chain in Flemington POM on 29/09/2022. Records of training was available for verification.</li> <li>2. Mass Balance records was accurately updated and maintained. Data verified to be tally with mill production records, despatch records and also Palm Trace Announcement Records.</li> </ol>		

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	The correction and corrective actions have been conducted and deemed to be appropriate to address the raised Critical Non-Conformity. Hence the Critical Non-Conformity is successfully closed on 03/11/2022.
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Non-conformity			
<b>NCR Ref #</b>	2235531-202208-M2	<b>Issued Date</b>	19/08/2022
<b>Due Date</b>	18/11/2022	<b>Closure Date</b>	07/10/2022
<b>Indicator &amp; Category (Critical / Minor)</b>	6.2.4 (Critical)		
<b>Statement of Nonconformity:</b>	Compliance with Employee's Minimum Standards of Housing, Accommodations and Amenities Act 1990 and was not effectively demonstrated		
<b>Requirement Reference:</b>	<p>The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>Normative reference: Section 23, weekly inspection of employee's housing - 1 (b): the perimeter drains around each dwelling or block of dwellings including all outlet drains are kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water.</p>		
<b>Objective Evidence:</b>	During site visit at line site (block D), common/main drain sighted with undergrowth which blocked the free flow of water. Based on social dialog tracker and OPP none of this issue highlighted. Observed at line site (block C), stagnant water was sighted at newly repaired outlet drain at the house backyard.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- The management has verified and removed the specific drain block which causing the stagnant water.</li> <li>- The management has removed all growth grass and saplings in all the main drain in housing complex.</li> <li>- To provide briefing to all Estate Working Group (EWG) to prioritize safety and cleanliness in housing area at their dedicated housing block.</li> </ul>		
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>- Inadequate monitoring by the estate management.</li> <li>- Insufficient training and refresher briefing to the block representative (EWG).</li> </ul>		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- The management has appointed contractor and awarded the contractor to do monthly cleaning to all main drain at housing area. This will be checked by Executive prior to payment before end of the month.</li> <li>- To provide briefing to all EWG to prioritize safety and cleanliness in housing area at their dedicated housing block on a monthly basis.</li> <li>- Executive to be involved in monthly EWG &amp; PIOA inspection</li> </ul>		

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	<ul style="list-style-type: none"> <li>– To do periodic flushing (3 months once) at all main drain using water tank / tide water to avoid mud/sludge to accumulate which causing water stagnant.</li> </ul>
<b>Assessment Conclusion:</b>	<p><u>Critical Non-Conformity Close Out Verification.</u></p> <ol style="list-style-type: none"> <li>1. The management has removed the drain block which was a unused vertical pipeline in the drain which was blocking the water from flowing. It was verified that there were no blockages and the water was flowing freely.</li> <li>2. All grasses that were grown in the drainage system has been removed. Verified that there were no blockages due to grasses in the drainage system.</li> <li>3. A briefing has been conducted on 12/09/2022 for the EWG on housing inspection and cleanliness. The briefing records was available for verification.</li> <li>4. Sungai Samak Estate has appointed a contractor, Perumalsamy A/L Ellumali on 01/09/2022 to conduct linesite and compound cleaning works which includes maintenance of all the drains in the linesite area. The contract agreement (Contract Agreement Number: 4300599032) was available for verification. Also verified the payment records for the month September 2022 for the linesite cleaning available for verification.</li> <li>5. The estate management has appointed En. Amir Hamzah Ahmad as the PIC to monitor the housing complex as stated in the appointment letter dated 25/09/2022 undersigned by the Estate Manager available for verification. Verified the Housing Complex Inspection records for the month of August and September 2022. The executives have verified each of the inspection forms.</li> <li>6. The estate have conducted flushing of all the main drains at the linesite using motor powered water tanks. Latest flushing was conducted on 20/09/2022 and 03/10/2022. Evidence of flushing was available for verification.</li> </ol> <p>The correction and corrective actions have been conducted and deemed to be appropriate to address the raised Critical Non-Conformity. Hence the Critical Non-Conformity is successfully closed on 07/10/2022.</p>

Non-conformity			
<b>NCR Ref #</b>	2235531-202208-N1	<b>Issued Date</b>	19/08/2022
<b>Due Date</b>	Next Surveillance Assessment	<b>Closure Date</b>	“Open”
<b>Indicator &amp; Category (Critical / Minor)</b>	3.3.2 (Minor)		
<b>Statement of Nonconformity:</b>	It was verified that there were lapses in the implementation of certain SOPs		
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures is in place.		
<b>Objective Evidence:</b>	<ol style="list-style-type: none"> <li>1. Sungai Samak Estate - The Mill Quality Management System under the Occupational Safety Health Manual, Chapter 9 (Chemical Safety Management) states under No. 6.0 Procedures for Handling, iii. Ensure that containers are properly labelled, not damaged and no spillage during handling.               <ul style="list-style-type: none"> <li>– During the visit to the Spraying Gang at Field 15A, it was sighted that there were Glyphosate and Wet &amp; Stick chemicals that were transferred and placed in containers that had no labels.</li> </ul> </li> </ol>		

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	<p>2. Sungai Samak Estate - Tatacara Kerja Selamat Keselamatan Penggunaan Racun with reference number SSE/SOP-03 Section 3 "Aktiviti campuran racun dan air (PREMIX) hanya boleh di lakukan di tempat yang telah disediakan khas. Campuran racun (PREMIX) hanya boleh dilakukan oleh pekerja yang di latih dan lantik sahaja"</p> <ul style="list-style-type: none"> <li>- Pure chemicals were seen to have been brought into the field (2 bottles of Allion and 5 bottles of Canyon) and placed in the trailer compartment.</li> </ul>
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. To immediately remove and only to allow premixed chemical into the field.</li> <li>2. All premixed container is labelled with type of chemical and hazard signage.</li> <li>3. To provide refresher briefing to all staff , mandore and workers on the SOP of "Tatacara Kerja Selamat Keselamatan Penggunaan Racun"</li> </ol>
<b>Root Cause Analysis:</b>	<ol style="list-style-type: none"> <li>1. Insufficient training to workers on SOP of "Tatacara Kerja Selamat Keselamatan Penggunaan Racun".</li> <li>2. Inadequate monitoring by the estate management.</li> </ol>
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Store clerk to collect previous issued empty chemical container and to be disposed as waste before issuing new chemical container for current usage. Empty container will be recorded and documented.</li> <li>2. All Executive , Mandore &amp; Staff to be given responsibility to do regular inspection on compartment storage.</li> <li>3. To provide refresher briefing to all staff , mandore and workers on the SOP of "Tatacara Kerja Selamat Keselamatan Penggunaan Racun".</li> </ol>
<b>Assessment Conclusion:</b>	<p>The submitted CAP detailing on proposed actions to be taken to address the raised nonconformity, based on the root cause identified were reviewed and deemed to be appropriate. Thus, the effectiveness of the CAP will be verified during the next surveillance assessment.</p>

Non-conformity			
<b>NCR Ref #</b>	2235531-202208-N2	<b>Issued Date</b>	19/08/2022
<b>Due Date</b>	Next Surveillance Assessment	<b>Closure Date</b>	"Open"
<b>Indicator &amp; Category (Critical / Minor)</b>	2.1.2 (Minor)		
<b>Statement of Nonconformity:</b>	The legal reference used in the Environmental Aspect and Impact Identification EAI/2018/xx/xxx was not updated.		
<b>Requirement Reference:</b>	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.		
<b>Objective Evidence:</b>	Environmental Aspect and Impact Identification EAI/2018/xx/xxx has made legal references to an outdated version EQ (Clean Air) Reg 78 and EQ (Scheduled Waste) Reg 1989 which is presently revised to EQ (Clean Air) Reg 2014 and EQ (Scheduled Waste) Reg 2005 respectively.		
<b>Corrections:</b>	Arrange the training to review Environmental Aspect & Impact Identification.		
<b>Root Cause Analysis:</b>	Environmental Aspect & Impact Identification was reviewed by Mill Management without proper training conducted.		

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<b>Corrective Actions:</b>	Conduct evaluation training Environmental Aspect & Impact Identification and review Environmental Aspect & Impact Identification. Reviewed Environmental Aspect & Impact Identification shall be verified by RSQM-NTR.
<b>Assessment Conclusion:</b>	The submitted CAP detailing on proposed actions to be taken to address the raised nonconformity, based on the root cause identified were reviewed and deemed to be appropriate. Thus, the effectiveness of the CAP will be verified during the next surveillance assessment.

Non-conformity			
<b>NCR Ref #</b>	2235531-202208-N3	<b>Issued Date</b>	19/08/2022
<b>Due Date</b>	Next Surveillance Assessment	<b>Closure Date</b>	"Open"
<b>Indicator &amp; Category (Critical / Minor)</b>	7.3.1 (Minor)		
<b>Statement of Nonconformity:</b>	The waste management plan for the canteen operations/activities is not effectively implemented and monitored.		
<b>Requirement Reference:</b>	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
<b>Objective Evidence:</b>	Flemington Palm Oil Mill - During the site visit at the mill canteen, monsoon drain and outside drain, there were traces of cooking oil waste from the canteen operations/activities flowing to the monsoon drain outside mill without mitigation plan.		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Review and Identify mill canteen activity in pollution prevention plan</li> <li>2. To establish cleaning schedule on weekly basis for mill canteen perimeter drain</li> </ol>		
<b>Root Cause Analysis:</b>	Insufficient of risk control on oil residue or other wastes from canteen		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. To construct oil trap connecting to mill canteen perimeter drain</li> <li>2. To establish cleaning schedule on monthly basis for the oil trap</li> <li>3. To educate canteen worker on the waste management procedure</li> <li>4. To provide container to dispose oil residue from the canteen</li> </ol>		
<b>Assessment Conclusion:</b>	The submitted CAP detailing on proposed actions to be taken to address the raised nonconformity, based on the root cause identified were reviewed and deemed to be appropriate. Thus, the effectiveness of the CAP will be verified during the next surveillance assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	-

Positive Findings	
PF #	Description

<b>PF 1</b>	Good Implementation of GAP across the estates.
<b>PF 2</b>	Good understanding by staffs and workers on GAP, H&S and Environment Protections.

### 3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
<b>NCR Ref #</b>	2121039-202110-M1	<b>Issued Date</b>	22/10/2021
<b>Due Date</b>	19/01/2022	<b>Closure Date</b>	15/12/2021
<b>Indicator &amp; Category (Critical / Minor)</b>	7.3.2 (upgraded to Major)		
<b>Statement of Nonconformity:</b>	Proper disposal of scheduled waste was not demonstrated according to established procedures		
<b>Requirement Reference:</b>	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
<b>Objective Evidence:</b>	<p>Bagan Datoh Estate</p> <p>During site visit at the Main Division of the estate, used oil based paint containers, 200L Oil containers, lubricant containers, used chemical pumps and used 20L chemical container which are categorized as scheduled waste were sighted to be stored at the Scrap Yard. The waste were not stored in the designated scheduled waste store with no waste information, date of generation and not properly transferred into closed and durable containers that are able to prevent spillage or leakage onto the environment as per SDP Sustainability and Quality Management (PSQM); Scheduled Waste (Hazardous Waste) Management; SD/SDP/PSQM(ESH)/203-EN1 dated 26 Feb 2015; 6.4.1, which states OU shall ensure that all waste generated are properly transferred into closed container which are durable and able to prevent spillage or leakage of the scheduled waste onto the environment. Furthermore, interview with the sampled workers involved in generating scheduled waste, indicated that they were unaware on the procedures of schedule waste storage in the estate.</p>		
<b>Corrections:</b>	The Scheduled Waste inventory updated in e-SWIS inventory record on monthly basis (as per current practice) meanwhile on-site inventory will be recorded by person in charge (store clerk) monitored by assistant manager (CePSWaM)*. The determination of SW category and its management will be discussed during ESH meeting and as per advised by CePSWAM together with Regional SQM.		
<b>Root Cause Analysis:</b>	Lacking in awareness on scheduled waste management specifically to the workers who involve indirectly with the scheduled waste identification of used oil-based paint container and other containers.		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>Estate will conduct refresher training on scheduled waste management to all related person I.e : mandore, store clerk, foreman, workshop attendant, medical staff, field staff and executive. The training will be done by CePSWaM personnel. The training will be conducted on annual basis and will be added in Annual Training Program.</li> </ol>		

	<ol style="list-style-type: none"> <li>2. Information on scheduled waste through pictorial will be placed at strategic area such as linesite, muster ground, dispensary, workshop and store area for better understanding to all workers and as part of communication.</li> <li>3. Estate will improve the quarterly inspection checklist at scheduled waste, workshop and linesite area as part of workplace inspection for continuous improvement. The inspection checklist will be based on Regional Sustainability Site Assessment's checklist.</li> </ol>
<p><b>Assessment Conclusion:</b></p>	<p>Onsite major NC close out verification:</p> <ol style="list-style-type: none"> <li>a. Allocation of designated scheduled waste storage area near to workshop area. Solid and liquid waste type stored separately and equipped with proper spill kit and secondary containment.</li> <li>b. Copy of 5th schedule for November 2021 dated 30/11/21 was made available. Used container under waste code SW409 (contaminated disposed container, bag or equipment) with total of 0.018 mt generated as at 30/11/2021.</li> <li>c. Training matrix for 2022 was verified and include specific workers that involved in scheduled waste management. Those identified personnel has to undergo the required training as per next year training plan/matrix. Latest training for 2021 was carried out on 24/11/2021 for a few groups of workers consist of mandore, foreman, store clerk, MA and other relevant staff that involved in scheduled waste management. Interview with the relevant personnel has confirmed the understanding on scheduled waste management. They are able to explain the process of waste handling from generation up to storage and disposal of waste. Scheduled waste information was posted at the strategic</li> <li>d. within the estate compound as part of awareness programme to all workers with regards to scheduled waste management.</li> <li>e. Workplace inspection was carried out on 3 monthly basis using Regional Sustainability Site Assessment's checklist. The latest checklist dated 1/11/2021 inspected by estate assistant manager was verified. No issue related to environmental issue reported in the checklist.</li> </ol> <p>Implemented action found to be effective to close the major NC on 15/12/2021. Continuous implementation will be further verified in the next assessment.</p>
<p><b>Effectiveness Closure (for previous audit closed Critical NC):</b></p>	<p><u>ASA2 1 Verification</u></p> <p>Site visit to the estates/mill complex in relation to the SW management verified the following:</p> <ol style="list-style-type: none"> <li>a. All storage are in designated area in locked and handled by PIC. Solid and liquid waste type stored separately and equipped with proper spill kit and secondary containment.</li> <li>b. Despatches are according to the regulatory requirement i.e. within 180 days . Records as per 7.3.2 No deferment except for batteries SW 102 for Bagan Datoh Estate being having low quantity with approval from DOE.</li> <li>c. Training matrix for 2022 was verified and include specific workers that involved in scheduled waste management. Interview with the relevant personnel has confirmed the understanding on SW management and handling. They are able to explain the process of waste handling from generation up to storage and disposal of waste. Scheduled waste information was posted at the strategic points at the workshop and store area.</li> <li>d. Workplace inspection was carried out on 3 monthly basis using Regional Sustainability Site Assessment's checklist. The latest checklist in Aug 2022</li> </ol>

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	<p>inspected by estate assistant manager was verified and continued being used todate. There was no issue related to environmental issue reported in the checklist.</p> <p>As such the NCR raised remains closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	2096510-202108-N1	<b>Issued Date</b>	25/08/2021
<b>Due Date</b>	19/08/2022	<b>Closure Date</b>	19/08/2022
<b>Indicator &amp; Category (Critical / Minor)</b>	6.7.5 (minor)		
<b>Statement of Nonconformity:</b>	Occupational injuries reported under JKPP 8 was not accurately recorded.		
<b>Requirement Reference:</b>	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.		
<b>Objective Evidence:</b>	Sighted at Sabak Bernam Estate, lost time injury (7 day) recorded in JKPP 8 (JKKP8/79060/2020) dated 25/1/2021 was not tally with the Medical Certificate (AM 568694) issued for 6 days by medical practitioner.		
<b>Corrections:</b>	Amending the file / documents based on actual record.		
<b>Root Cause Analysis:</b>	The error due to 1st time reporting to JKPP (8) by newly recruited medical practitioner. The PIC was in charge as Medical Assistant on October 2020 and no experience with the DOSH requirement & reporting.		
<b>Corrective Actions:</b>	Continuous training on the LTA / accident record by PIC for the medical practitioner to ensure no recurrence issue. LTI case validation exercise to be done before JKPP 8 submission.		
<b>Assessment Conclusion:</b>	<p><u>ASA2_1 Verification</u></p> <ol style="list-style-type: none"> <li>The management have conducted training on LTA and accident record monitoring for the PIC. Records of training were available for verification.</li> <li>Based on the records of LTA and estate and mill monthly accident records and medical certificate, it was verified that all data has been tally.</li> </ol> <p>The correction and corrective action done to address the raised minor non-conformity was deemed to be able to solve the issues raised. Hence, the minor non-conformity was successfully closed on 19/08/2022.</p>		

Opportunity for Improvement	
OFI#	Description
OFI 1	NA

**3.3.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1930293-202007-M1	Critical	3.4.3	17/07/2020	Closed on 02/10/2020
1930293-202007-M2	Critical	6.2.3	17/07/2020	Closed on 02/10/2020
1930293-202007-M3	Critical	6.7.3	17/07/2020	Closed on 02/10/2020
1930293-202007-N1	Minor	7.3.2	17/07/2020	Previous NC was not effectively closed and upgraded to Major NC under the same indicator.
1930293-202007-N2	Minor	4.2.3	17/07/2020	Closed on 22/10/2021
1930293-202007-N3	Minor	6.7.2	17/07/2020	Closed on 22/10/2021
1930293-202007-N4	Minor	2.1.2	17/07/2020	Closed on 22/10/2021
2121039-202110-M1	Critical	7.3.2	22/10/2021	Closed on 15/12/2021
2096510-202108-N1	Minor	6.7.5	25/08/2021	Closed on 19/08/2022
2235531-202208-M1	Critical	3.8.12	19.08.2022	Closed on 07/10/2022
2235531-202208-M2	Critical	6.2.4	19.08.2022	Closed on 03/11/2022
2235531-202208-N1	Minor	3.3.2	19.08.2022	"Open"
2235531-202208-N2	Minor	2.1.2	19.08.2022	"Open"
2235531-202208-N3	Minor	7.3.1	19.08.2022	"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 SDPB SOU4 Flemington POM Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
<b>Type of Stakeholder</b> (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	<b>Stakeholder name / organization</b>	<b>Means of communication</b> (e.g. face to face interview, email, phone interview, comment from public notice)

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Internal Stakeholder	Gender Committee Representative	Face to Face
Internal Stakeholder	Foreign Workers Representative	Face to Face
Internal Stakeholder	Contractor	Face to Face
Union	NUPW Representative	Face to Face
Contractor	Alpha Meta Agencies Sdn Bhd	Face to Face
Community	Village Head – Bagan Datuk	Face to Face
Governmental Agency	Corporal – Hutan Melintang Police Station	Face to Face
Governmental Agency	SJK (T) Flemington Estate	Face to Face
Contractor	Deen Mulia Enterprise	Face to Face
Contractor	Ms Ramu Enterprise	Face to Face

Stakeholders comment	
<b>1</b>	<p><b>Feedbacks:</b> Gender Committee Representatives &amp; female workers            Based on interview, the female workers understand the function of Gender committee and aware of the complaint mechanism if there is any issues. They were treated equally without any discrimination by the management.</p> <p><b>Audit Team verification and response:</b>            The management will respect the rights of female employees and keep monitoring if there is any case of sexual harassment and violence happen. No further issue.</p>
<b>2</b>	<p><b>Feedbacks:</b> Foreign workers representative            Their wages are paid according to Minimum Wage Order 2020 and overtime was offered to them on voluntary basis. Other terms of employment were clearly understood by them. The new house repair request using OPP @ OilPalmPal is very effective by using QR code. They can always highlight any issues during Social Dialogue sessions.</p> <p><b>Audit Team verification and response:</b>            Positive comments highlighted by worker’s representative. No further comment.</p>
<b>3</b>	<p><b>Feedbacks:</b> Contractor            Any project/task/job offered by Sime Darby Plantation is based on long term or short-term contract. For one off job, either local work order or purchase order will be issued to the supplier or vendor. No pending @ outstanding payment so far and payment was promptly done in timely manner. As for hiring of foreign workers, Sime Darby Plantation has not allowed any foreign workers without a valid VISA/permit @ PLKS entering their premise.</p> <p><b>Audit Team verification and response:</b>            No negative comments raised by contractors and continue to follow rules and regulations set by Sime Darby Plantation.</p>

**List of land owner / user contacted**

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Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Flemington Certification Unit have already gone through 2 <sup>nd</sup> Cycle of Replanting therefore this is not applicable.					

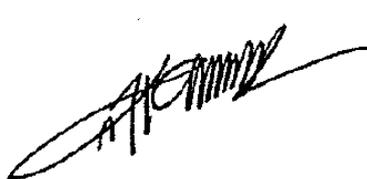
Previous land owner / user comment	
<b>NA</b>	<b>Feedbacks: -</b>
	<b>Audit Team verification and response: -</b>

**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.

**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 SDPB SOU4 Flemington POM 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 SDPB SOU4 Flemington POM is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
<b>Name: VIJAY KANNA PAKIRISAMY</b>	<b>Name: YUSRI BIN ISA</b>
<b>Company Name: BSI SERVICES (M) SDN BHD</b>	<b>Company Name: SIME DARBY PLANTATION BERHAD</b>
<b>Title: Client Manager</b>	<b>Title: SOU 4 CHAIRMAN</b>
<b>Signature:</b> 	<b>Signature:</b> <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> 
<b>Date: 03/11/2022</b>	<b>Date: 3-11-2022</b>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 1.1:</b> 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><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Documents required for all unit of certification available in Flemington POM Certification Unit:</p> <ul style="list-style-type: none"> <li>• Land titles/user rights</li> <li>• Occupational health and safety plans</li> <li>• Plans and impact assessments relating to environmental and social impacts</li> <li>• HCV documentation</li> <li>• Pollution prevention and reduction plans</li> <li>• Details of complaints and grievances</li> <li>• Continuous improvement plans,</li> <li>• Public summary of certification assessment report</li> <li>• Group Sustainability Policy</li> <li>• Record of contributions to community development</li> </ul> <p>Sustainability Reports, policies and procedures are also accessible through the company's website:  <a href="http://www.simedarbyplantation.com/">http://www.simedarbyplantation.com/</a></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

<p>1.1.3</p>	<p><b>(C)</b> Records of requests for information and responses are maintained.          - Critical (Major) compliance -</p>	<p>Records of requests for information and responses are maintained and kept at respective operating units. Internal and external request recorded in the various type of documents such as logbooks, social dialog tracker, house repair request @ OPP/Oil PalmPal, meeting minutes etc. Any feedbacks from the stakeholders will be used for the inputs for SIA management plan revision.</p> <p>Request by stakeholders conducted through stakeholders meeting, visitor books, letter and forms. The mill and estates maintain the records of all request and response. Sighted the records of request from the stakeholders as follows:</p> <ol style="list-style-type: none"> <li>1. Flemington POM: Road lighting at corner opposite mill was found to be faulty. This expose to possibility of accident and road safety. Status: Road lighting has been repaired and issue closed.</li> <li>2. Bagan Datoh Estate: Bagan Datoh Police Station – Issue: Workers were not wearing helmet while riding motorbike to town. Action/status: Reminder was given during muster and ensure fully complete helmet worn by workers. AP will monitor at the main post</li> <li>3. Sg Samak Estate             <ul style="list-style-type: none"> <li>- Headmaster SK Ulu Bernam Estate has made a request for tarmac road to reduce emission of dust to school compound. Status: Budget request for FY 2023 for tarmac road was included in the budget for RM 500,000.</li> <li>- Request from NUPW representative for estate van. Status: Budget for 1 (one) unit of van allocated for RM 130,000.</li> </ul> </li> </ol>	<p>Complied</p>
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		<p>4. Sabak Bernam Estate:</p> <ul style="list-style-type: none"> <li>- SJK (T) Ladang Sabak Bernam highlighted an issue with regards to soil erosion during drain desilting and cleaning adjacent to boundary drain. Status: Estate has reminded the contractor to ensure no soil erosion occurs. DID will also monitor any cleaning/desilting work under DID's jurisdiction and ensure no such issues arises.</li> </ul>													
<p>1.1.4</p>	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</p> <p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.</p> <table border="1" data-bbox="1137 871 1930 1152"> <thead> <tr> <th>Estate/Mill</th> <th>Date of meeting</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Sabak Bernam Estate</td> <td>21/06/2022</td> <td rowspan="4">All issues incorporated under SIA management plan</td> </tr> <tr> <td>Flemington POM</td> <td>27/05/2022</td> </tr> <tr> <td>Bagan Datoh Estate</td> <td>09/08/2022</td> </tr> <tr> <td>Flemington Estate</td> <td>19/05/2022</td> </tr> </tbody> </table>	Estate/Mill	Date of meeting	Remarks	Sabak Bernam Estate	21/06/2022	All issues incorporated under SIA management plan	Flemington POM	27/05/2022	Bagan Datoh Estate	09/08/2022	Flemington Estate	19/05/2022	<p>Complied</p>
Estate/Mill	Date of meeting	Remarks													
Sabak Bernam Estate	21/06/2022	All issues incorporated under SIA management plan													
Flemington POM	27/05/2022														
Bagan Datoh Estate	09/08/2022														
Flemington Estate	19/05/2022														
<p>1.1.5</p>	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>The mill and estates List of Stakeholders are available detailing the relevant stakeholders. Stakeholders includes Contractors, suppliers, FFB suppliers, government agencies, non-governmental agencies and local communities.</p>	<p>Complied</p>												
<p><b>Criterion 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.</p>															

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 &amp; responsibility, enterprise and excellence during any business process. The policy was developed in Bahasa Malaysia, English and Bahasa Indonesia which can be downloaded via <a href="https://www.simedarbyplantation.com/corporate/ethical-business-practices">https://www.simedarbyplantation.com/corporate/ethical-business-practices</a>.</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 <a href="https://www.simedarbyplantation.com/corporate/whistleblowing">https://www.simedarbyplantation.com/corporate/whistleblowing</a> 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. Sampled the contractors and vendors signed on Vendor Integrity Pledge:</p> <ul style="list-style-type: none"> <li>i. Company: Fame Transportation Sdn Bhd, Registration No.: 979057-U</li> <li>ii. Company: Perumal Samy Enterprise, Registration No.: IP 0339219-A</li> <li>iii. Company: Alpha Meta Agencies Sdn Bhd, Registration no.: 114364-X</li> <li>iv. Company: MK Kumar Enterprise, Registration no.: IP0101071-X</li> </ul>	Complied
<p><b>Principle 2: Operate legally and respect rights</b></p>			
<p><b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.</p>			

<p>2.1.1</p>	<p><b>(C)</b> The Unit of Certification complies with legal requirements          - Critical (Major) compliance -</p>	<p>The mill &amp; estates continue to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. Among the evidence of compliance verified were:</p> <p><u>Flemington POM</u></p> <ol style="list-style-type: none"> <li>1. MPOB License; License Number: 529874004000; License Validity Period: 01/06/2022 – 31/05/2023.</li> <li>2. Permit Barang Kawalan Berjadual; Reference Number: KPDHEP.TI.600-4/3/84; Serial Number: P(A004077); Description: Diesel (16,000 Litres) &amp; Petrol (100 Litres); License validity Period: 30/10/2021 – 29/10/2022.</li> <li>3. DOE License; License Number: 004234; License Validity Period: 23/06/2022 – 30/06/2022.</li> </ol> <p><u>Sungai Samak Estate</u></p> <ol style="list-style-type: none"> <li>1. MPOB License; License Number: 526340002000; License Validity Period: 01/02/2022 – 31/01/2023.</li> <li>2. Air Compressor License; License Number: PMT-PK/21 67787; License Registration Number: 10/01/2023; License Expiry Date: 10/01/2023.</li> <li>3. Permit Barang Kawalan Berjadual; Serial Number: P(A004038); Reference Number: KPDNHEP.TI.600-4/3/55; Description: Diesel (Storage Quantity: 19,000 Litres) and Petrol (2,7000 Litres); License Validity Period: 26/08/2021 – 25/08/2024.</li> </ol> <p><u>Sabak Bernam Estate</u></p>	<p>Complied</p>
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		<ol style="list-style-type: none"> <li>1. MPOB License; MPOB License Number: 545859002000; License Validity Period: 01/02/2022 – 31/01/2023.</li> <li>2. Permit Barang Kawalan Berjadual; Serial Number: P(B006456); Reference Number: SL/KSL/07/19/SK; Description: Diesel; Storage Capacity: 15,000 Litres; License Validity Period: 10/09/2021 – 09/09/2022.</li> </ol> <p><u>Bagan Datoh Estate</u></p> <ol style="list-style-type: none"> <li>1. MPOB License; License Number: 525521002000; License Validity Period: 01/01/2022 – 31/12/2022.</li> <li>2. Permit Barang Kawalan Berjadual; Serial Number: P(A004081); Reference Number: KPDNHEP.TI.600-4/3/97; Description: Diesel; Storage Quantity: 13,000 Litres; License Validity Period: 05/11/2021 – 04/11/2022.</li> <li>3. Air Receiver Permit; Permit Number: PMT-PK/22 81881; Registration Number: PK PMT 3646; Permit Expiry Date: 31/10/2023.</li> </ol> <p><u>Flemington Estate</u></p> <ol style="list-style-type: none"> <li>1. Permit Barang Kawalan Berjadual; Serial Number: P(A004077); Reference Number: KPDNHEP.TI.600-4/3/84; Description: Diesel (16,000 Litres) &amp; Petrol (100 Litres); License Validity Period: 30/10/2021 – 29/10/2022.</li> <li>2. MPOB License; License Number: 525193002000; License Validity Period: 01/12/2021 – 30/11/2022.</li> </ol>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Addressed in Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008. A mechanism to ensure compliance to legal and other requirement has been</p>	<p>Non-compliance</p>

		<p>documented in EQMS &amp; MQMS (Estate &amp; Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 04. RSQM Department and the respective operating units will undertake the responsibility of identifying, managing, updating, and tracking the legal requirement as well as monitoring the status of legal compliance.</p> <p>Tracking system is available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office. SOU 04 has maintained the list of all relevant laws and requirement and documented in Legal and Other Requirement Register (LORR). The list was updated on annual basis or new updates on the register.</p> <p>Each specific operating unit have appointed specific personals to be in charge to monitor changes on the LORR. Sighted the appointment letters of the PIC as follows.</p> <ol style="list-style-type: none"> <li>1. Fahzol Shawal Bin Ahmad Shapiai appointed as PIC Quality Management Systems, to monitor any changes on the LORR and update as and when necessary, dated 20/05/2020, undersigned by the estate manager.</li> <li>2. Sooria Ram a/l Simmadoraippanna appointed as PIC Quality Management Systems, to monitor any changes on the LORR and update as and when necessary, dated 15/01/2020, undersigned by the estate manager.</li> <li>3. Zulkarnain Bin Mohammed appointed as the PIC for Quality Management Systems, to monitor any changes on the LORR and update as and when necessary, dated 03/01/2022, undersigned by the estate manager.</li> <li>4. Juzaili Bin Muda appointed as the PIC for Quality Management Systems, to monitor any changes on the LORR and update as and when necessary, dated 01/07/2022, undersigned by the</li> </ol>	
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		<p>estate manager.</p> <p>5. Shahmil Bin Suhaimi appointed as the PIC for Quality Management Systems, to monitor any changes on the LORR and update as and when necessary, dated 01/01/2022, undersigned by the estate manager.</p> <p>The Environmental Aspect and Impact Identification EAI/2018/xx/xxx has made legal references to an invalid version i.e EQ (Clean Air) Reg 78 and EQ (Scheduled Waste) Reg 1989 which is presently stand as EQ (Clean Air) Reg 2014 and EQ (Scheduled Waste) Reg 2005 respectively. Hence an NCR AB 01 of 2022 is raised.</p>																																									
<p>2.1.3</p>	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 4 estates, during the field inspection confirmed that they were clearly marked and maintained.</p> <table border="1" data-bbox="1133 967 1937 1362"> <thead> <tr> <th>Estate</th> <th>Field</th> <th>Neighbouring</th> <th>Field</th> <th>Neighbouring</th> </tr> </thead> <tbody> <tr> <td>Sg Samak</td> <td>P15</td> <td>Smallholder</td> <td>P14</td> <td>TOL</td> </tr> <tr> <td>Sg Samak</td> <td>P14C</td> <td>Ulu Bernam UP</td> <td>-</td> <td>-</td> </tr> <tr> <td>Sg Bernam</td> <td>P20A</td> <td>Jalan Suhaimi</td> <td>P20E</td> <td>Kg Batu Sepintas</td> </tr> <tr> <td>Sg Bernam</td> <td>P19H</td> <td>Kg Naidu</td> <td>P20E</td> <td>Chinese Cemetery</td> </tr> <tr> <td>Flemington</td> <td>P15T</td> <td>Smallholder</td> <td>P08C</td> <td>Sg Bernam</td> </tr> <tr> <td>Flemington</td> <td>P15T</td> <td>Jenderata UP</td> <td>P17A</td> <td>Smallholder-</td> </tr> <tr> <td>Bgn Datoh</td> <td>P12A</td> <td>S/holder Ager</td> <td>P14C</td> <td>Government Bridge</td> </tr> </tbody> </table>	Estate	Field	Neighbouring	Field	Neighbouring	Sg Samak	P15	Smallholder	P14	TOL	Sg Samak	P14C	Ulu Bernam UP	-	-	Sg Bernam	P20A	Jalan Suhaimi	P20E	Kg Batu Sepintas	Sg Bernam	P19H	Kg Naidu	P20E	Chinese Cemetery	Flemington	P15T	Smallholder	P08C	Sg Bernam	Flemington	P15T	Jenderata UP	P17A	Smallholder-	Bgn Datoh	P12A	S/holder Ager	P14C	Government Bridge	<p>Complied</p>
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		Bgn Datoh	P15D	G Quarters	P81A	Kg Teluk Perikam	
<b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.							
2.2.1	A list of contracted parties is maintained. - Minor compliance -	A list of contracted parties maintained by all operating units within SOU 4 in their respective List of Stakeholders Information FY 2022 which consists of stakeholders among Local Community Heads, Neighbours, Local Authorities and Vendors (Contractors & Suppliers)					Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	Contracts contain specific clauses on meeting applicable legal requirements available in the Vendor Integrity Pledge records for sampled contractors as per below: 1. Contractor: Alpha Meta Agencies Sdn Bhd, FFB transportation service for Sime Darby Plantation Berhad’s estates, valid for 2 years from 1/1/22 to 31/12/23. 2. Contractor: MK Kumar Enterprise, EFB transport and application for Sime Darby Plantation Berhad’s estate – Bagan Datoh Estate, valid for 2 years from 1/1/22 to 31/12/22. 3. Contractor: Rajan Contractors Sdn Bhd, Rental of backhoe, excavator, lorry and farm tractor for Sime Darby Plantation Berhad’s estate – Bagan Datoh Estate, valid for 2 years from 1/1/22 to 31/12/22					Complied
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. - Minor compliance -	The contract documents and Vendor Integrity Pledge (VIP) records sighted in the indicator 2.2.2 above also contain clauses disallowing child, forced and trafficked labour. No young workers are employed by contractors and vendors.					Complied
<b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.							
2.3.1	<b>(C)</b> For all directly sourced FFB, the mill requires: • Information on geo-location of FFB origins	Flemington POM receives crop from the Sime Darby Plantation Berhad estates, mainly from Sabak Bernam Estate, Sungei Samak					Complied

	<ul style="list-style-type: none"> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Estate, Flemington Estate and Bagan Datoh Estate or other if any are from diversion from the sister mills as results of breakdown or annual maintenance. The mill maintains all records as per indicator of all the FFB suppliers. The mill does not receive FFB from outsiders.</p>																															
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.</p> <p>- Minor compliance -</p>	<p>Flemington POM does not receive indirectly sourced FFB. Hence this indicator is not applicable.</p>	Not Applicable																														
<p><b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b></p>																																	
<p><b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>																																	
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The 4 estates continued to commit to long term economic and financial viability. The annual budgets for 2022 to 2026 were sighted. The budget covers activities for upkeep, cultivation, harvesting &amp; evacuation, welfare, capital expenditure, RSPO compliance etc. The budget also included projections on yield/ha, and total cost of production per m ton &amp; per ha and CAPEX - capital expenditure mainly for buildings, furniture and others asset related expenses. The estates adopted the following format for the annual budget.</p> <table border="1" data-bbox="1144 1134 1924 1377"> <thead> <tr> <th>Year</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Mature Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Immature Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Total Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Sg Samak FFB /mt</td> <td>66079</td> <td>66306</td> <td>62837</td> <td>61899</td> <td>63806</td> </tr> </tbody> </table>	Year	2022	2023	2024	2025	2026	Mature Ha	x	x	x	x	x	Immature Ha	x	x	x	x	x	Total Ha	x	x	x	x	x	Sg Samak FFB /mt	66079	66306	62837	61899	63806	Complied
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Sg Samak YPH	24.40	25.79	25.97	26.87	27.42
Bgn Datoh FFB / mt	76687	69775	81613	85861	86548
Bgn Datoh YPH	24.57	20.50	22.83	24.63	26.18
Sbk BernamFFB /mt	51152	53492	63954	66611	67361
Sbk Bernam YPH	28.72	26.00	27.78	28.40	28.72
F/mton FFB /mt	27936	38233	36737	41544	41877
F/mton YPH	20.33	27.01	24.50	25.65	26.54
RM/mt FFB	x	x	x	x	x
RM/ha	x	x	x	x	x

Similarly the mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning. The business plan among others contains;

- a) FFB yield & CPO production forecast
- b) Extraction Ratios – OER / KER,
- c) Cost of production
  - administration / labour overhead
  - processing cost labour, maintenance, consumables
  - depreciation and head office charges
- d) EVIT running accounts
- e) CAPEX - capital expenditure.

Year	2022	2023	2024	2025	2026
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		FFB processed	187061	220261	229301	236031	244076	
		OER	21.14	19.96	20.14	20.34	20.54	
		KER	4.75	4.61	4.66	4.70	4.75	
		Administration	x	x	x	x	x	
		Processing cost	x	x	x	x	x	
		Depreciation	x	x	x	x	x	
		H Q charges	x	x	x	x	x	
		RM/mt FFB	x	x	x	x	x	
		RM/mt CPO	x	x	x	x	x	
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	The long-range replanting programs (LRRP) until 2027 were sighted on all 4 estates. The program was reviewed yearly and incorporated into their annual financial budget. The program sighted for the next 5 years in hectares is as follows:						Complied
		Year	SSE	BDE	FE	SBE		
		2023	78.56	0.00	0.00	0.00		
		2024	79.18	152.39	34.08	0.00		
		2025	144.77	151.57	79.74	0.00		
		2026	145.60	48.24	0.00	0.00		
		2027	191.65	0.00	0.00	0.00		

<p>3.1.3</p>	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.          - Minor compliance -</p>	<p>The Management Review was held as follows chaired by the respective Managers:</p> <table border="1" data-bbox="1144 454 1928 802"> <thead> <tr> <th>Estate</th> <th>Date</th> <th>Attendee</th> <th>Date</th> <th>Attendee</th> </tr> </thead> <tbody> <tr> <td>SSE</td> <td>05/08/22</td> <td>14</td> <td>23/06/21</td> <td>13</td> </tr> <tr> <td>BDE</td> <td>29/07/22</td> <td>18</td> <td>25/06/21</td> <td>15</td> </tr> <tr> <td>FLE</td> <td>09/08/22</td> <td>11</td> <td>18/06/21</td> <td>10</td> </tr> <tr> <td>SBE</td> <td>04/08/22</td> <td>15</td> <td>02/07/21</td> <td>15</td> </tr> <tr> <td>FPOM</td> <td>01/08/22</td> <td>7</td> <td>05/07/21</td> <td>5</td> </tr> </tbody> </table> <p>The agenda discussed among others includes the following;</p> <ul style="list-style-type: none"> <li>a) Results of internal audits</li> <li>b) Customer feedback</li> <li>c) Process performance and product conformity</li> <li>d) Status of preventive &amp; corrective actions</li> <li>e) Follow up action from management review</li> <li>f) Changes that could affect the management system</li> <li>g) Recommendation for improvement</li> </ul> <p>Minutes of meeting for all 4 estates and mill were sighted and verified. No major issues were highlighted during the meeting. Main focus is on the forthcoming external RSPO audit in Aug 2022.</p>	Estate	Date	Attendee	Date	Attendee	SSE	05/08/22	14	23/06/21	13	BDE	29/07/22	18	25/06/21	15	FLE	09/08/22	11	18/06/21	10	SBE	04/08/22	15	02/07/21	15	FPOM	01/08/22	7	05/07/21	5	<p>Complied</p>
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<p><b>Criterion 3.2:</b> 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><b>(C)</b> 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>This has been established in the Continuous Improvement Plan 2022 updated in Jan 2022 respectively for both the Mill and Estate. This compilation was made with subject to the consideration of the main social and environmental impacts. These include to continue engagement with relevant stakeholders (workers, surrounding communities, government agencies, agencies, suppliers and contractors. Management documents related to environmental plans and impact assessments maintained available. Among the documents were:</p> <ul style="list-style-type: none"> <li>(a) Environmental Aspect Identification (EAI) and Environmental Impact Evaluation (EIE) registers.</li> <li>(b) Environmental Improvement Plan 2022</li> <li>(c) Pollution Prevention Plan 2022</li> <li>(d) Water Management Plan. 2022</li> <li>(e) Waste Management Plan 2022</li> </ul> <p>The Continuous Management Plan 2022 for the estate/mill operations among others include the following;</p> <table border="1" data-bbox="1144 1018 1906 1358"> <thead> <tr> <th></th> <th>Projects</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td></td> <td>Estates</td> <td></td> </tr> <tr> <td>1</td> <td>SSE - Welfare</td> <td>Road tarmac for partial complex RM1M</td> </tr> <tr> <td>2</td> <td>SSE - Operations</td> <td>Water gate 1 unit expansion RM240K</td> </tr> <tr> <td>3</td> <td>SSE - Operations</td> <td>Bund heightening RM1.8M 3 years</td> </tr> <tr> <td>4</td> <td>SBE - Welfare</td> <td>Workers quarters roofing - RM 100K</td> </tr> <tr> <td>5</td> <td>SBE - Operations</td> <td>Electrical flood pump RM 100K</td> </tr> </tbody> </table>		Projects	Details		Estates		1	SSE - Welfare	Road tarmac for partial complex RM1M	2	SSE - Operations	Water gate 1 unit expansion RM240K	3	SSE - Operations	Bund heightening RM1.8M 3 years	4	SBE - Welfare	Workers quarters roofing - RM 100K	5	SBE - Operations	Electrical flood pump RM 100K	<p>Complied</p>
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	6	SBE - Welfare	Staff Quarters Upgrading - RM100 - 3 yrs
	7	BDE - Welfare	Water pipe replacement Bagan Div RM350K
	8	BDE - Welfare	Car porch Workers Qrts RM 1.8M - 5 years
	9	BDE - Welfare	Solar Street 50 units RM 165K
	10	BDE - Operations	FFB CANTAS chisel - 40 units RM 180K
	11	FLE - Welfare	Asbestos ceiling - 20 units WQ RM650K
	12	FLE - Welfare	Street lights 1.5 km 30 units RM 60K
	13	FLE - Operation	New bins 40 units RM450K in 3 years
		Flemington POM	
	1	Welfare 2023-24	Upgrading tiling for 38 units WQ RM350K
	2	ETP Security 2023	New Fencing for effluent pond RM120K
	3	Operation - 2023	New cages 20 units RM800K
4	Welfare - 2023	New garage housing - 54 units RM378K	
5	Operations 2022/3	Concrete mill compound RM155K	
6	Operations 2022	Omega Project - RM4.6M machinery/facility	

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		<p>Continuous improvements are established covering the social, environmental and safety impacts in the operating units. The action plan established focusing on:</p> <ul style="list-style-type: none"> <li>a) Communication and whistle blower</li> <li>b) Dumping rubbish out site estate landfill.</li> <li>c) Increase awareness on safety and health</li> <li>d) resurface road and office compound area with milling waste</li> <li>e) To maintain 5S work standard in all operation</li> </ul>	
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><b>PROCEDURAL NOTE:</b> The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>RSPO metric template version 2.1 is used for the reporting of SOU 4 Flemington Certification Unit’s metrics (economic, social and environment). Data reporting period is January to December 2021 for (social and environment metrics) and economic metrics from Jul 2021 – Jun 2022 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.</p>	Complied
<b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>1. SOP available for the Palm Oil Mill and the Estates. Palm Mill holds two SOPs:</p> <ul style="list-style-type: none"> <li>- Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill.</li> <li>- Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) to includes mill SOPs. Sighted SOP for fruit handling station, sterilization</li> </ul>	Complied

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		<p>station, threshing station, pressing station, kernel recovery station, boiler station and effluent treatment plant.</p> <ul style="list-style-type: none"> <li>- Sime Darby Plantation – Sustainable Supply Chain and traceability Procedure for Palm Oil Mill; Version 1; Issue no.: 01; Issue date: 01 June 2022.</li> </ul> <p>2. Estate has a separate SOP which is SOP EQMS, Pictorial Safety Standard, Estate Quality Management System and Agricultural reference Manual that covered planting material, nursery techniques, replanting, land preparation, planting density, canopy management, water management, harvesting, loose fruit collection, weed control and transport.</p>	
<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place.</p> <ul style="list-style-type: none"> <li>- Minor Compliance -</li> </ul>	<p>Sime Darby Plantations have set in place various means to ensure the consistent implementation of procedures are in place. Among others are:</p> <ol style="list-style-type: none"> <li>1. Internal Audits by RSQM Department</li> <li>2. Management Review</li> <li>3. Structured Crop Recovery Assessment for the Mill</li> <li>4. Plantation Visits and Mill Advisory Visits</li> <li>5. Agronomist Visits</li> <li>6. Work Site Inspections</li> <li>7. Weekly Linesite Inspections</li> </ol> <p>Nevertheless, it was verified that there were lapses in the implementation of certain SOPs as below.</p>	<p>Non-compliance</p>

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		<ol style="list-style-type: none"> <li>1. Sungai Samak Estate - The Mill Quality Management System under the Occupational Safety Health Manual, Chapter 9 (Chemical Safety Management) states under No. 6.0 Procedures for Handling, iii. <i>Ensure that containers is properly labelled, not damaged and no spillage during handling.</i> <ul style="list-style-type: none"> <li>- During the visit to the Spraying Gang at Field 15A, it was sighted that there were Glyphosate and Wet &amp; Stick chemicals that were transferred and placed in containers that had no labels.</li> </ul> </li> <li>2. Sungai Samak Estate - Tatacara Kerja Selamat Keselamatan Penggunaan Racun with reference number SSE/SOP-03 Section 3 "Aktiviti campuran racun dan air (PREMIX) hanya boleh di lakukan di tempat yang telah disediakan khas. Campuran racun (PREMIX) hanya boleh dilakukan oleh pekerja yang di latih dan lantik sahaja" <ul style="list-style-type: none"> <li>- Pure chemicals were seen to have been brought into the field (2 bottles of Allion and 5 bottles of Canyon) and placed in the trailer compartment.</li> </ul> </li> </ol>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Operating units visited maintain all records of monitoring and available for verification. The Mill Advisor and Plantation Advisor (PA) are accountable to monitor the estates compliance towards the SOP, Budget and Productivity. Regular Internal Audits are conducted by the RSQM Department to check on the compliance towards the SOPs.</p> <ol style="list-style-type: none"> <li>1. Internal Audit have been conducted by the RSQM Department for the mill and estates and the Internal Audit Report was available for verification as below: <ul style="list-style-type: none"> <li>- Flemington POM: 18/07/2022</li> </ul> </li> </ol>	Complied

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		<ul style="list-style-type: none"> <li>- Sungai Samak Estate: 21/07/2022</li> <li>- Sabak Bernam Estate: 22/07/2022</li> <li>- Bagan Datoh Estate: 19/07/2022</li> <li>- Flemington Estate: 20/07/2022</li> </ul>	
<p><b>Criterion 3.4:</b> 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><b>(C)</b> 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 are no new plantings or operations within SOU 04 Flemington. However there were plans and impact assessments relating to environmental impacts based on documents as following:</p> <ul style="list-style-type: none"> <li>a. Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register</li> <li>b. Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI</li> <li>c. Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE.</li> </ul> <p>The register covers all estates and mill activities/operation. Among the significant environmental aspects related to the estate operation including the activities from;</p> <ul style="list-style-type: none"> <li>a. harvesting, pest and disease, upkeep programme</li> <li>b. FFB Transportation to the mill.</li> </ul> <p>Details in EAI/2017/08-01. Environmental aspect i.e.</p> <ul style="list-style-type: none"> <li>- Release to air</li> <li>- Land contamination (spillage)</li> </ul>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>- Fuel Consumption</li> </ul> <p>Whilst the environmental aspect for the mill among others are;</p> <ol style="list-style-type: none"> <li>a. the boiler stack emission, black smoke</li> <li>b. palm oil mill effluent (POME) discharge and land contamination,</li> <li>c. activities related to managing of scheduled wastes and general waste.</li> </ol> <p>the Social Impact Assessment (SIA) carried out by PSQM team on 27/6 – 1/7/2016. 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. The report includes both positive and negative impact and its recommendation</p> <p>Documents are maintained as sighted above with latest review as shown in 3.4.3. There is no change of current practices required to mitigate negative effects based on identified impacts for both the mill and estates. However the mill and estates have conducted periodical review on the aspects and impacts identified and evaluated as registered.</p> <p>The mill and estates has continuously implemented its annual programs that were established as part of its individual Pollution Prevention Plan 2022. Managers and assistant managers of mill and estates were identified as person-in-charge of the</p>	
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Programs which were established upon review of the aspect and impact register. It was observed that the reviewing and updating on the registers were made annually if there's no any new activity within respective sites.

	Projects	Details
	Estates	
1	SSE - Welfare	Road tarmac for partial complex RM1M
2	SSE - Operations	Water gate 1 unit expansion RM240K
3	SSE - Operations	Bund heightening RM1.8M 3 years
4	SBE - Welfare	Workers quarters roofing - RM 100K
5	SBE - Operations	Electrical flood pump RM 100K
6	SBE - Welfare	Staff Quarters Upgrading - RM100 - 3 yrs
7	BDE - Welfare	Water pipe replacement Bagan Div RM350K
8	BDE - Welfare	Car porch Workers Qrts RM 1.8M - 5 years
9	BDE - Welfare	Solar Street 50 units RM 165K
10	BDE - Operations	FFB CANTAS chisel - 40 units RM 180K
11	FLE - Welfare	Asbestos ceiling - 20 units WQ RM650K
12	FLE - Welfare	Street lights 1.5 km 30 units RM 60K
13	FLE - Operation	New bins 40 units RM450K in 3 years

		<table border="1"> <tr> <td></td> <td>Flemington POM</td> <td></td> </tr> <tr> <td>1</td> <td>Welfare 2023-24</td> <td>Upgrading tiling for 38 units WQ RM350K</td> </tr> <tr> <td>2</td> <td>ETP Security 2023</td> <td>New Fencing for effluent pond RM120K</td> </tr> <tr> <td>3</td> <td>Operation - 2023</td> <td>New cages 20 units RM800K</td> </tr> <tr> <td>4</td> <td>Welfare - 2023</td> <td>New garage housing - 54 units RM378K</td> </tr> <tr> <td>5</td> <td>Operations 2022/3</td> <td>Concrete mill compound RM155K</td> </tr> <tr> <td>6</td> <td>Operations 2022</td> <td>Omega Project - machinery/facility RM4.6M</td> </tr> </table>		Flemington POM		1	Welfare 2023-24	Upgrading tiling for 38 units WQ RM350K	2	ETP Security 2023	New Fencing for effluent pond RM120K	3	Operation - 2023	New cages 20 units RM800K	4	Welfare - 2023	New garage housing - 54 units RM378K	5	Operations 2022/3	Concrete mill compound RM155K	6	Operations 2022	Omega Project - machinery/facility RM4.6M	
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3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>The Action Plans for all units within SOU 04 Flemington were reviewed at least once a year.</p> <ol style="list-style-type: none"> <li>Areas of concern/key findings were identified together with the action plan, person in charge and respective completion date.</li> <li>There is evidence that the areas of concern /key findings were developed with the consultation of affected parties.</li> <li>For example, these include complaints from workers on the issue of cows, bad road conditions near the workers' housing, installation of street lights at housing complex roads floods affecting local communities, and rubbish collection by Majlis Perbandaran Teluk Intan..</li> </ol> <p>Social management plan has been reviewed for all operating units on annual basis. For example, at Flemington Estate, SIA management plan was reviewed on 31/7/22. The management plan has been developed after compilation the feedbacks and issues</p>	Complied																					

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		<p>during various of meeting such as stakeholder meeting, union meeting and gender committee meeting. Summary of issues raised will be incorporated in the SIA management plan for further monitoring.</p>																			
<p>3.4.3</p>	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.          - Critical (Major) compliance -</p>	<p>The Social/Environmental Action Plan 2022 available for each units were available having information i.e issues, management plan, PIC and time frame. The input are gathered from the meeting minutes</p> <ol style="list-style-type: none"> <li>Gender Committee, NUPW,</li> <li>Safety Meeting,</li> <li>Complaint &amp; Request from internal &amp; external stakeholders and muster briefing).</li> <li>Stakeholders meeting</li> </ol> <table border="1" data-bbox="1144 847 1928 1147"> <thead> <tr> <th>OU</th> <th>Review date</th> <th>Updates</th> </tr> </thead> <tbody> <tr> <td>SSE</td> <td>01/07/2022</td> <td>No changes - no new activities</td> </tr> <tr> <td>SBE</td> <td>04/01/2022</td> <td>No changes - no new activities</td> </tr> <tr> <td>FE</td> <td>18.02/2022</td> <td>No changes - no new activities</td> </tr> <tr> <td>FPOM</td> <td>01/07/2022</td> <td>No changes - no new activities</td> </tr> <tr> <td>BDE</td> <td>01/01/2022</td> <td>No changes - no new activities</td> </tr> </tbody> </table> <p>There is no new planting in SOU4 (Flemington POM Certification Unit). Sighted the Social Impact Assessment (SIA) carried out by PSQM team on 27/6 – 1/7/2016. 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</p>	OU	Review date	Updates	SSE	01/07/2022	No changes - no new activities	SBE	04/01/2022	No changes - no new activities	FE	18.02/2022	No changes - no new activities	FPOM	01/07/2022	No changes - no new activities	BDE	01/01/2022	No changes - no new activities	<p>Complied</p>
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		<p>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. The report includes both positive and negative impact and its recommendation. Example of management plan reviewed:</p> <ol style="list-style-type: none"> <li>1. Flemington POM: Road lighting at corner opposite mill was found to be faulty. This expose to possibility of accident and road safety. Status: Road lighting has been repaired and issue closed.</li> <li>2. Bagan Datoh Estate: Bagan Datoh Police Station – Issue: Workers were not wearing helmet while riding motorbike to town. Action/status: Reminder was given during muster and ensure fully complete helmet worn by workers. AP will monitor at the main post</li> <li>3. Sg Samak Estate             <ol style="list-style-type: none"> <li>a. Headmaster SK Ulu Bernam Estate has made a request for tarmac road to reduce emission of dust to school compound. Status: Budget request for FY 2023 for tarmac road was included in the budget for RM 500,000.</li> <li>b. Request from NUPW representative for estate van. Status: Budget for 1 (one) unit of van allocated for RM 130,000.</li> </ol> </li> <li>4. Sabak Bernam Estate             <p>SJK (T) Ladang Sabak Bernam highlighted an issue with regards to soil erosion during drain desilting and cleaning adjacent to boundary drain. Status: Estate has reminded the contractor to ensure no soil erosion occurs. DID will also monitor any</p> </li> </ol>	
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		cleaning/desilting work under DID's jurisdiction and ensure no such issues arises.	
<b>Criterion 3.5:</b> A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -	The Human Resource Department in HQ has established Hiring of Local Workers procedure (Doc. No.: 01-12-19) dated 01/12/2019 and Workforce Management Unit Liaison & Recruitment procedure (WMU/LR-SOPP/MARCH2016, Rev. 0 dated 30/03/2016) to explain the recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried out by the HQ through appointed agents in respective countries.	Complied
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 Flemington POM was on 20/07/2022. 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/flyer at the places nearby the villages.	Complied
<b>Criterion 3.6:</b> An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<b>(C)</b> All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	The mill and estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following: 1. Change in work process 2. Revision/changes in legislative requirement 3. Occurrence of accidents	Complied

		<p>Based on the risk assessments, appropriate risk control measures were determined and implemented for the respective activities and operation.</p> <p>Sighted documents related compliance towards Health and Safety such as below:</p> <p><u>Flemington POM</u></p> <ol style="list-style-type: none"> <li>1. Chemical Health Risk Assessment was conducted in compliance to the provisions of the USECHH Regulations 2000. The CHRA assessment was conducted on 02/07/2020 by GATConst Sdn Bhd. The report (Report Number: HQ/09/ASS/00/124 – 2020/0026) was available for verification.</li> <li>2. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulation 2019. The assessment was conducted on 06/07/2020 by SH Safety Consultancy Sdn Bhd. The report was available for verification.</li> <li>3. Audiometric Programme was conducted on 30/08/2021 at Procoma Environmental (M) Sdn Bhd for 31 workers deemed to be exposed to excessive noise in the mill. Results indicated that 4 workers had abnormal results and listed for OHD Referral. The 4 workers were referred to OHD on 27/01/2022 where one worker was diagnosed with STS. He is currently under Medical leave due to non-related incident and will presume with the retest once resumes work.</li> <li>4. Audiometric Test was conducted on Aug 2021 at Sabak Dispensary for 20 mill workers exposed to hazardous chemicals and fumes. Results were available and indicated all workers were fit to work.</li> </ol>	
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		<p><u>Sungai Samak Estate</u></p> <ol style="list-style-type: none"> <li>Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) Regulation 2019. The assessment was conducted on 08/07/2020 by SH Safety Consultancy Sdn Bhd. The report was available for verification.</li> <li>Chemical Health Risk Assessment was conducted in compliance to the provisions of the USECHH Regulations 2000. The CHRA assessment was conducted on 25/06/2020 by GATConst Sdn Bhd. The report (Report Number: HQ/09/ASS/00/124 – 2020/0023) was available for verification.</li> </ol> <p><u>Sabak Bernam Estate</u></p> <ol style="list-style-type: none"> <li>Chemical Health Risk Assessment was conducted in compliance to the provisions of the USECHH Regulations 2000. The CHRA assessment was conducted on 26/06/2020 by GATConst Sdn Bhd. The report (Report Number: HQ/09/ASS/00/124 – 2020/0024) was available for verification.</li> <li>Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) regulation 2019. The assessment was conducted on 08/07/2022 by SH Safety Consultancy Sdn Bhd. the report was available for verification.</li> <li>Baseline Audiometric Test was conducted on 21/04/2022 by Procoma Environmental (M) Sdn Bhd for a total of 26 workers deemed to exposed to excessive noise. The results indicated that 6 workers were to be referred to appointed OHD. The estate has planned to refer the workers on 12/10/2022.</li> </ol>	
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		<p><u>Bagan Datoh Estate</u></p> <ol style="list-style-type: none"> <li>Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) regulation 2019. The assessment was conducted on 07/08/2020 by SH Safety Consultancy Sdn Bhd. the report was available for verification.</li> <li>Chemical Health Risk Assessment was conducted in compliance to the provisions of the USECHH Regulations 2000. The CHRA assessment was conducted on 17/06/2020 by GATConst Sdn Bhd. The report (Report Number: HQ/09/ASS/00/124 – 2020/0021) was available for verification.</li> </ol> <p><u>Flemington Estate</u></p> <ol style="list-style-type: none"> <li>Noise Risk Assessment was conducted in compliance with Occupational Safety and Health (Noise Exposure) regulation 2019. The assessment was conducted on 07/07/2020 by SH Safety Consultancy Sdn Bhd. the report was available for verification.</li> <li>Chemical Health Risk Assessment was conducted in compliance to the provisions of the USECHH Regulations 2000. The CHRA assessment was conducted on 18/06/2020 by GATConst Sdn Bhd. The report (Report Number: HQ/09/ASS/00/124 – 2020/0022) was available for verification.</li> </ol>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.          - Critical (Major) compliance -</p>	<p>Flemington POM and Supply Base has maintained an approved Health and Safety Policy signed by top management that is displayed prominently on notice boards in English/Bahasa Malaysia. Safety &amp; Health Management Plan was available accordingly.</p>	Complied

		<p>Annual H&amp;S plan established by each Operating Unit are mostly implemented through Annual Training Program 2022 to address the identified health and safety risks. The emphasis is on safe work by providing</p> <ul style="list-style-type: none"> <li>▪ Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk.</li> <li>▪ Awareness and understanding of workplace hazards and how to identify, report, and control them.</li> <li>▪ Specialized training, when their work involves unique hazards.</li> </ul> <p>Besides formal classroom training other means include on-the-job training and worksite demonstrations to effectively convey safety concepts, ensuring understanding of hazards and their controls, and promoting good work practices.</p> <p>The safety performance of each Operating Unit is monitored via:</p> <ul style="list-style-type: none"> <li>• Internal Audit conducted by the Head office Sustainability Palm Oil Department.</li> <li>• Workplace inspection by site OSH Committee.</li> <li>• Direct involvement of supervisor and rounds by Asst Manager.</li> <li>• Safety occurrence reporting.</li> <li>• Health / medical surveillance.</li> <li>• Chemical exposure monitoring.</li> </ul> <p>The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken.</p>	
<p><b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
3.7.1	<p><b>(C)</b> 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</p>	<p>The training programmes were documented in training matrix of the operating units on annual basis. The matrix has the information about subjects of trainings and time to be conducted. Generally, the</p>	Complied

	<p>aspects of the RSPOP&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>topics of training cover the subjects related to best practices, OHS, environmental and social in which also taking into account gender-specific needs.</p>																											
<p>3.7.2</p>	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Training records are maintained by each Operating Unit. Sample some records at each Operating as follows:</p> <p><u>Flemington POM</u></p> <table border="1" data-bbox="1137 598 1915 928"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>RSPO Briefing</td> <td>07/02/2022</td> </tr> <tr> <td>PPE, COBC, Whistleblowing, SDPB Policy &amp; Human Rights Charter Training</td> <td>23/04/2022</td> </tr> <tr> <td>Hearing Conservation Training</td> <td>16/06/2022</td> </tr> <tr> <td>Chemical Handling Training</td> <td>21/04/2022</td> </tr> <tr> <td>Grievance Channel Awareness</td> <td>22/11/2021</td> </tr> </tbody> </table> <p><u>Sungai Samak Estate</u></p> <table border="1" data-bbox="1137 1018 1915 1364"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>First Aid Training</td> <td>20/07/2022</td> </tr> <tr> <td>Incident Notification &amp; Reporting Training</td> <td>11/08/2022</td> </tr> <tr> <td>Water Sampling Training</td> <td>25/07/2022</td> </tr> <tr> <td>Driver &amp; Loader Safety Training</td> <td>20/07/2022</td> </tr> <tr> <td>Spraying Training</td> <td>20/05/2022</td> </tr> <tr> <td>Harvesting Training</td> <td>21/08/2021</td> </tr> </tbody> </table>	Training	Date	RSPO Briefing	07/02/2022	PPE, COBC, Whistleblowing, SDPB Policy & Human Rights Charter Training	23/04/2022	Hearing Conservation Training	16/06/2022	Chemical Handling Training	21/04/2022	Grievance Channel Awareness	22/11/2021	Training	Date	First Aid Training	20/07/2022	Incident Notification & Reporting Training	11/08/2022	Water Sampling Training	25/07/2022	Driver & Loader Safety Training	20/07/2022	Spraying Training	20/05/2022	Harvesting Training	21/08/2021	<p>Complied</p>
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		Hearing Conservation Training	15/07/2021	
		RSPO, COBC, Whistleblowing and SDP Policies Training	05/07/2021	
		<u>Sabak Bernam Estate</u>		
		<b>Training</b>	<b>Date</b>	
		Safety Harness Training	15/08/2022	
		Incident Notification Reporting Training	09/08/2022	
		Basic First Aid & CPR Training	15/04/2022	
		Harvesting Training	03/08/2022	
		Replanting Training	28/07/2022	
		Tractor and Workshop Safety Training	21/07/2022	
		Scheduled Waste Training	21/07/2022	
		Ergonomics Awareness Training	19/07/2022	
		<u>Bagan Datoh Estate</u>		
		<b>Training</b>	<b>Date</b>	
		ILO & Safety Briefing - Contractors	07/05/2022	
		Hearing Conservation Training	21/06/2022	
		Scheduled Waste Training	09/08/2022	
		RSPO Briefing	02/08/2022	

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3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Flemington POM has conducted a RSPO SCCS Training for all relevant personals (Mill Manager, Asst Mill Manager, Weighbridge Clerk, Supervisor, Lab Analyst, FFB Grader and Auxiliary Police) on 07/06/2022 via Microsoft Teams. The training was conducted based on the RSPO SCCS requirements and procedures.</p>	Complied										
<p><b>Criterion 3.8:</b> Supply chain requirement for mills          (note: All supply chain requirements are considered as <b>Critical (C)</b>. However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>													
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p>	<p>Flemington POM only receives RSPO Certified FFB from certified sources which is the 4 estates under the same Strategic Operating Unit SOU 4 (Flemington Estate, Sungai Samak Estate, Sabak Bernam Estate and Bagan Datoh Estate) and their sister estates under Sime Darby Plantations (due to crop diversion). They do not</p>	Complied										

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	<p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>receive FFB from any external (certified or uncertified) sources. Hence the mill has opted for the Identity Preserve Module.  The mill do not sperate the CPO produced as all received FFB are from certified sources within the organization.</p>	
3.8.2	<p>Mass Balance Module  A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>FFB were obtained from all Sime Darby certified estates only. There was no third party's crop nor non-certified FFB received by the mill. This was verified during the stakeholders meeting and site visit at mill.  Thus, this indicator is not applicable.</p>	Not Applicable
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. (Table 10)</p>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The registration of PalmTrace will be carried out by the GSQM Department. All transaction will be registered in the PalmTrace. SOU 04 Flemington POM registered license available in PalmTrace as following:  - Member ID: RSPO_PO1000000294  - Member category: Oil Mill</p>	Complied
3.8.5	<p>Documented procedures</p>	<p>Documented procedures available as following:</p>	Complied

	<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"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>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.</li> <li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li> </ul>	<ol style="list-style-type: none"> <li>1. Procedure namely Sime Darby Plantation – Sustainable Supply Chain and traceability Procedure for Palm Oil Mill; Version 1; Issue no.: 01; Issue date: 01 June 2022.</li> <li>2. The procedure was established which covers responsibility, reporting of certified CPO/PK, non-conformance material, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, Record keeping, Training, Complaint Communication and Claim and etc.</li> <li>3. The Mill Manager as Head of Operating Unit has the overall responsibility for the implementation of SOP, and he may assign roles to relevant personnel or invite personnel from various departments necessary to assist in the SOP implementation. Sighted the identified and assigned suitable employees to implement and maintain the traceability system by management is Fahzol Shawal Bin Ahmad Shapiai (Assistant Manager) – PIC for Environmental and Quality Management Systems dated 10/01/2022.</li> <li>4. The procedures for receiving and processing certified and non-certified FFBs are documented in the Sime Darby Plantation – Sustainable Supply Chain and traceability Procedure for Palm Oil Mill; Version 1; Issue no.: 01; Issue date: 01 June 2022.</li> </ol>	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> <li>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b. Effectively implements and maintains the standard requirements within its organisation.</li> </ul> </li> </ul>	<p>Internal audit conducted based on the SOP for Sustainable Supply Chain and Traceability of SPMS Appendix 15 (18: Internal Audit); Version 2; Issue # 5; Date: April 2019. The procedure conforms to the requirements in the RSPO SCCS.</p> <p>The latest Internal Audit for RSPO SCCS was done on 18/07/2022 conducted by Sustainability Compliance Unit, Group Sustainability Department. There were no findings raised on the RSPO SCCS requirements.</p>	Complied

	<p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>		
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>SOU 4 Flemington POM receives RSPO Certified FFB from its own supply base estate, and sister estates (diverted from sister mills). FFB Ticket will be submitted to the mill during incoming of FFB from the estate. Information of the FFB Ticket is then recorded in the WB system by the Weighbridge Operator.</p> <p>Verified the sampled FFB Ticket for incoming FFB for as below:</p> <ol style="list-style-type: none"> <li>1. Estate: Flemington Estate             <ol style="list-style-type: none"> <li>a. Ticket Number: C/N No. 76679</li> <li>b. Product: FFB</li> <li>c. Date of Delivery: 30/06/2022</li> <li>d. Vehicle Number: KAD 497</li> <li>e. FFB Weight: 9450 KG</li> </ol> </li> <li>2. Estate: Bagan Datoh Estate             <ol style="list-style-type: none"> <li>a. Ticket Number: 91371</li> <li>b. Product: FFB</li> <li>c. Date of Delivery: 17/03/2022</li> <li>d. Vehicle Number: WDM 4857</li> <li>e. FFB Weight: 8,200 KG</li> </ol> </li> </ol> <p>The procedures for receiving and processing certified and non-certified FFBs are documented in the Sime Darby Plantation – Sustainable Supply Chain and traceability Procedure for Palm Oil Mill; Version 1; Issue no.: 01; Issue date: 01 June 2022. The procedure also states the mechanism for handling non-conforming FFB and documents.</p>	<p>Complied</p>

<p>3.8.8</p>	<p><b>Sales and Goods Out</b></p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<p>SOU 4 Flemington POM have ensured that all the required information are available in document form for any sales of MB-Certified products. CPO – RSPO MB and PK – RSPO MB have been sold during the audit period and sampled records of transactions have been verified as follows.</p> <p><u>MB-Certified CSPO</u></p> <ol style="list-style-type: none"> <li>1. Contract: S/PSD/2206/CPO0066A &amp; S/PSD/2206/CPO0066AB             <ul style="list-style-type: none"> <li>a. The name and address of the buyer: SDOC</li> <li>b. The name and address of the seller: KKS Flemington</li> <li>c. The loading or shipment/ delivery date: 27/06/2022</li> <li>d. The date on which the documents were issued: 27/06/2022</li> <li>e. RSPO certificate number: RSPO 590802</li> <li>f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Crude Palm Oil (CPO) – RSPO IP</li> <li>g. The quantity of the products delivered: 40,170 KG</li> <li>h. Any related transport documentation: W/B Ticket# 020698</li> <li>i. A unique identification number: W/B Ticket# 020698</li> </ul> </li> </ol> <p><u>MB-Certified CSPK</u></p> <ol style="list-style-type: none"> <li>2. Contract: S/PSD/2205/PK0150             <ul style="list-style-type: none"> <li>a. The name and address of the buyer: SDOC</li> <li>b. The name and address of the seller: KKS Flemington</li> <li>c. The loading or shipment/ delivery date: 30/06/2022</li> <li>d. The date on which the documents were issued: 30/06/2022</li> <li>e. RSPO certificate number: RSPO 590802</li> <li>f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Crude Palm Kernel – RSPO IP</li> <li>g. The quantity of the products delivered: 29,980 KG</li> <li>h. Any related transport documentation: W/B Ticket# 020714</li> </ul> </li> </ol>	<p>Complied</p>
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		i. A unique identification number: W/B Ticket# 020714	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>Sime Darby has established Sime Darby Plantation – Sustainable Supply Chain and traceability Procedure for Palm Oil Mill; Version 1; Issue no.: 01; Issue date: 01 June 2022, Section 13.0: Outsourced Contractors.</p> <p>In the SOP under section 13.1 stated that CPO Mill cannot outsourced processing activities like refining or crushing. Reviewed the contract between Sime Darby Plantation Berhad’s with Mayang Bayumas Sdn Bhd. dated 12/12/2020. Refer T/SDPB/PEN/CPO/0720/003. In the contract stated the mill has the legal ownership of all input material as per clause 6: Failure to Provide the Services and/or Comply with Laws and Guidelines under sub clause (b). Clause reserving the right of the certification body to audit the outsourced contractor was stated in the agreement under clause 5: The Transporter Undertakings, Obligations and Covenants, sub clause (d) Roundtable Sustainable Palm Oil (RSPO) and Malaysian Sustainable Palm Oil (MSPO).</p>	Complied
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	The details of the contractors used for transporting the CPO was documented in the stakeholder list. Among the details include name of contractors, address, phone number and person responsible.	Complied

3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	There were no new contractors used for the physical handling of RSPO certified products by the Mill. Nevertheless the management are aware of the requirements to 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	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ul> </li> </ul>	<ol style="list-style-type: none"> <li>1. Flemington POM has established Standard Operating Procedure to maintain all records of evidence on the implementation of RSPO SCCS. The SOP was documented in Sime Darby Plantation – Sustainable Supply Chain and traceability Procedure for Palm Oil Mill; Version 1; Issue no.: 01; Issue date: 01 June 2022 under section 5.0: Control of Documents and Records.</li> <li>2. As stated in SOP for Sime Darby Plantation – Sustainable Supply Chain and traceability Procedure for Palm Oil Mill; Version 1; Issue no.: 01; Issue date: 01 June 2022 under section 5.0: Control of Documents and Records all traceability records should be maintained at minimum period of 3 years.</li> <li>3. Flemington POM receives and processes only RSPO certified FFB. Therefore, it uses the Identity Preserved supply chain system. The records of all received FFB and deliveries of RSPO certified CPO and PK were not balanced and updated on a real time basis in the Mass Balance Sheet. The records did not capture the sales of CPO and PK as conventional and the Carry Forward shows negative figures. Hence a Critical Non-Conformity was raised.</li> </ol>	Non-compliance

3.8.13	<p><b>Extraction Rate</b></p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The extraction rate for mill is calculated in daily production detail report. Conversion factor of CPO and PK production is depending on the actual OER and KER. Last year's average were 20.74% (OER) &amp; 4.48% (KER).</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The facility is using the actual extraction rate and therefore updating of rates is not necessary.</p>	Complied
3.8.15	<p><b>Processing</b></p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Flemington POM only receives RSPO Certified FFB from certified sources which is the 4 estates under the same Strategic Operating Unit SOU 4 (Flemington Estate, Sungai Samak Estate, Sabak Bernam Estate and Bagan Datoh Estate) and their sister estates under Sime Darby Plantations (due to crop diversion). They do not receive FFB from any external (certified or uncertified) sources. Hence the mill has opted for the Identity Preserve Module.</p> <p>There is no need to separate the CPO produced as all received FFB are from certified sources within the organization.</p>	Complied
3.8.16	<p><b>Registration of Transactions</b></p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace.</p> <p>Based on the announcement summary, all the registrations were found to be in order.</p> <p>No RSPO volume sold for other scheme. RSPO certified volume only downgraded to conventional CPO/PK.</p>	Complied

3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied
<b>General corporate communications</b>			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>No off-product claim made by Flemington POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc). Thus, this indicator is not applicable</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> <li>a. Display its RSPO membership status</li> <li>b. Display the RSPO web address (www.rspo.org)</li> <li>c. State that the member supports the work of the RSPO</li> <li>d. State the member's history with regard to the RSPO.</li> <li>e. Use the RSPO trademark to promote its membership of the RSPO.</li> </ul> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	<p>Not applicable as no off-product claim made by Flemington POM as to date.</p>	Complied
4.3	<p>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.</p>	<p>Not applicable as no off-product claim made by Flemington POM as to date.</p>	Complied
4.4	<p>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.</p>	<p>Not applicable as no off-product claim made by Flemington POM as to date.</p>	Complied

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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 Flemington POM as verified through documentations and websites.	Complied
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e product/commodity with SCC model (Crude Palm Oil (CPO – RSPO IP) and RSPO certificate number: RSPO 590802	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	Flemington POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Not Applicable
<b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b>			
<b>Certified oil palm content (IP)</b>			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Oil palm content is 100% CPO and claim as RSPO IP-certified.	Complied

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	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	Not Applicable for SOU Flemington POM as the content of Oil Palm is 100%.	Not Applicable
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	Oil palm content is 100% CPO & PK and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.	Complied
<b>Labelling and trademark (IP)</b>			
	Members are allowed to use the RSPO label in one of the following ways: <ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'CERTIFIED' or</li> <li>• RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</li> </ul>	As at to date, no RSPO trademark used by the facility.	Complied
<b>Messaging (IP)</b>			
	Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements: <ul style="list-style-type: none"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> </ul>	As at to date, no Messaging done by the facility.	Complied

	<ul style="list-style-type: none"> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>		
<p><b>Principle 4: Respect community and human rights and deliver benefits</b></p>			
<p><b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p><b>(C)</b> 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 &amp; Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding &amp; 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 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)</p>	<p>Complied</p>

		dated 25/03/2020 for more information. <a href="#">Policy on the Protection of HRDs FINAL.pdf (sime-darbyplantation.com)</a> . The policies were communicated to stakeholders during stakeholder meetings. Besides, the briefing of the policies was carried out on 4/6/2022 at Sg Samak Estate.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	Sime Darby Plantation prohibits any form of harassment in their operation as per the policies above. Interviewed with the workers confirmed that no harassment by the management.	Complied
<b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<b>(C)</b> 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. - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they believe everyone has the responsibility to promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognise the important role Human Rights Defenders, whistle blowers, complainants and community spokespersons play by lodging complaints in confidence.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in <a href="https://www.sime-darbyplantation.com/corporate/whistleblowing">https://www.sime-darbyplantation.com/corporate/whistleblowing</a> . Besides, the company has implemented "Suara Kami" as a platform for the workers to raise any issue. The workers in Flemington Palm Oil Mill were briefed on the complaint mechanism during morning muster. Besides, external stakeholders were briefed during the	Complied

		stakeholder meeting. Interviewed with the internal and external stakeholders confirmed that they have been briefed and understood on the complaint mechanism implemented by the company. The latest initiative introduced (ULULA - Impact Worker Helpline) effective from 27/8/2021.	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	The on-site verification through consultation among internal and external stakeholders and documented records reviewed shown that SOU 4 keeps parties to a grievance informed of progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders in addressing issues raised by stakeholders. Furthermore, neither any complaints nor land dispute occurred in the SOU 4 Certification Unit at the time of audit as verified through stakeholder consultation.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in <a href="https://www.simedarbyplantation.com/corporate/whistleblowing">https://www.simedarbyplantation.com/corporate/whistleblowing</a> . Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.	Complied
<b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.			

4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>The mill and estates' management have made contribution to the local communities based on the requests from stakeholders. Among good deeds and contributions to the stakeholders sighted;</p> <ol style="list-style-type: none"> <li><i>Kami Prihatin</i> Campaign (food and essential items distribution under Yayasan Sime Darby)</li> <li>Voluntary activities such as to assist "Majlis Korban" for Aidul Adha 1443H (Masjid Jamek Sultan Hasimudin) and temple cleaning (Sri Maha Mariamman).</li> <li>Contribution/donation to SJK (T) Flemington Estate.             <ul style="list-style-type: none"> <li>- Recycling container/bin @ 3R bin</li> <li>- Resurfacing (crusher run) for school garage</li> <li>- Electrical cable repair/ rewiring</li> </ul> </li> </ol>	Complied								
<b>Criterion 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.											
4.4.1	<p><b>(C)</b> 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>SOU4 estates were able to demonstrate the evidence of legal ownership if its lands through possession of land titles. The estates has a list of all its land titles which have the information about names of lease, hectare, terms &amp; conditions, lease period and grant numbers. Copies of the land titles were available at the estate's offices while the original were kept at headquarter</p> <table border="1" data-bbox="1137 1077 1926 1375"> <thead> <tr> <th>Estate</th> <th>Land title</th> <th>Land use type</th> <th>Tenure</th> </tr> </thead> <tbody> <tr> <td>Bagan Datoh Estate</td> <td>Sample : i) GRN 179143, lot 3720, Mukim Bagan Datuk, title area: 465.3892 ha</td> <td>Agriculture except for title no. (iii) – no category</td> <td>Freehold</td> </tr> </tbody> </table>	Estate	Land title	Land use type	Tenure	Bagan Datoh Estate	Sample : i) GRN 179143, lot 3720, Mukim Bagan Datuk, title area: 465.3892 ha	Agriculture except for title no. (iii) – no category	Freehold	Complied
Estate	Land title	Land use type	Tenure								
Bagan Datoh Estate	Sample : i) GRN 179143, lot 3720, Mukim Bagan Datuk, title area: 465.3892 ha	Agriculture except for title no. (iii) – no category	Freehold								

			<p>ii) GRN 1513, lot 4020, Mukim Bagan Datuk, title area: 303.4126 ha</p> <p>iii) GRN 141480, lot 5132, Mukim Bagan Datuk, title area: 396.8 ha</p> <p>Total titles: 68 (3,929.777 ha)</p>			
		Flemington Estate	<p>Sample :</p> <p>i) GRN 141481, lot 5138, Mukim Bagan Datuk, title area: 446.4 ha</p> <p>ii) GRN 105018, lot 5435, Mukim Teluk Bahru, title area: 260.6 ha</p> <p>iii) GRN 53747, lot 4877, Mukim Hutan</p>	Agriculture	Freehold	

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			Melintang, title area: 460.5315 ha Total titles: 40 (1,906.84 ha)		
	Sabak Bernam Estate	Sample: i) GRN 29597, lot 1, Mukim Sabak, title area: 2,023.425 ha ii) GRN 45208, lot 2095, Mukim Sungai Panjang, title area: 504.0364 ha Total titles: 7 (2,511.3679 ha)	No category/no specific land use type	Freehold	
	Sg Samak Estate	Sample: i) GRN 47177, lot 4189, Mukim Hutan Melintang, title area: 1,137.1067 ha ii) PN 313725, lot 6875,	Agriculture	Freehold, PN 313725 leasehold for 60 years until 2 <sup>nd</sup> April 2025.	

			Mukim Hutan Melintang, title area: 504.0364 ha Total titles: 11 (3,017.93 ha)		
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.</p>			Complied
4.4.2a	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 -	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.</p>			Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities.</p>			Complied

	- Minor compliance -	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.	
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	<b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	There is no land dispute recorded. Boundary stone was identified and marked in the GPS surveyed map. Trenches were available to demarcate the boundary and this has confirmed by interviewed with the neighbouring smallholder and local community.	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	<b>(C)</b> 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	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
<p><b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	Complied
4.5.2	<p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples,</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	Complied

	the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -		
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
<b>Criterion 4.6:</b> 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	<b>(C)</b> 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	Complied

		process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	
4.6.2	<p><b>(C)</b> 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>	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
4.6.3	<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>	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
4.6.4	<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>	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
<p><b>Criterion 4.7:</b> 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><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</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	Complied

		reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	
4.7.2	<p><b>(C)</b> 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>	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
4.7.3	<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>	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.	Complied
<p><b>Criterion 4.8:</b> 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>	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.8.2	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see</p>	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during	Complied

	Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> 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 -	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Only RSPO certified crop received from own group estates. Thus, this indicator is not applicable.	Not Applicable
5.1.2	<b>(C)</b> 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).	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Only	Not Applicable

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	- Critical (Major) compliance -	RSPO certified crop received from own group estates. Thus, this indicator is not applicable.									
5.1.3	<b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Only RSPO certified crop received from own group estates. Thus, this indicator is not applicable.	Not Applicable								
5.1.4	<b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Only RSPO certified crop received from own group estates. Thus, this indicator is not applicable.	Not Applicable								
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Only RSPO certified crop received from own group estates. Thus, this indicator is not applicable.	Not Applicable								
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Only RSPO certified crop received from own group estates. Thus, this indicator is not applicable.	Not Applicable								
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Records of weighing equipment stamping was maintained on annual basis at visited operating units. Summary of stamping records as follows: <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="width: 25%;">Weighing equipment</th> <th style="width: 25%;">Capacity</th> <th style="width: 25%;">Date of stamping, certificate no.</th> <th style="width: 25%;">Operating Unit</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Weighing equipment	Capacity	Date of stamping, certificate no.	Operating Unit					Complied
Weighing equipment	Capacity	Date of stamping, certificate no.	Operating Unit								

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		M/Toledo A3-ATK-00249	60,000 kg @ 60 tonne	D 023766 stamped on 16/6/22	Flemington POM	
		M/Toledo A3-ATK-00349	60,000 kg @ 60 tonne	D 023765 stamped on 16/6/22		
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Only RSPO certified crop received from own group estates. Thus, this indicator is not applicable.				Not Applicable
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	There was no grievance received from external FFB suppliers since the last audit. Sime Darby Plantation Mill Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 1, issue date 01/04/2008) established to handle if there is any external complaint. Interviewed with the FFB supplier and he is able to show the understanding on the complaint mechanism				Complied
<b>Criterion 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.						
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Only RSPO certified crop received from own group estates. Thus, this indicator is not applicable.				Not Applicable

5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Only RSPO certified crop received from own group estates. Thus, this indicator is not applicable.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Only RSPO certified crop received from own group estates. Thus, this indicator is not applicable.	Not Applicable
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Only RSPO certified crop received from own group estates. Thus, this indicator is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Starting from 24/7/21, no more OCP FFB received as the management has decided to upgrade from MB to IP module. Only RSPO certified crop received from own group estates. Thus, this indicator is not applicable.	Not Applicable
<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<b>(C)</b> 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	Complied

		discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. They will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy could be downloaded from <a href="https://www.simedarbyplantation.com/sustainability/human-rights-charter">https://www.simedarbyplantation.com/sustainability/human-rights-charter</a> .	
6.1.2	<p><b>(C)</b> 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.	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 Flemington Palm Oil Mill and other visited estates 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><b>(C)</b> 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>	The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted	Complied

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		<p>quarterly. SDPB has introduced the new Terms of Reference (TOR) for Gender Representatives and Gender Committee, dated March 2021 which supersede the previous Gender Committees Gender Committee Handbook, First Edition 2014. In this new TOR, a more definitive roles, and responsibilities as well as governance structure and programmes were added in.</p> <p>Gender Committee were established by the mill and estates management and verified at each operating unit. Meetings to be conducted once every 2 months or whenever necessary according to the new TOR for SOU meeting. Meetings conducted at respective units as below:</p> <ul style="list-style-type: none"> <li>i. Flemington POM: 22/02/2022, 23/05/2022</li> <li>ii. Sg Samak Estate: 27/06/2022, 06/04/2022, 21/02/2022</li> <li>iii. Sabak Bernam Estate: 15/07/2022, 07/03/2022</li> </ul> <p>SOU 4 gender representative meeting carried out every 2 months: 14/7/22, 23/5/2022, 11/3/2022, 24/1/2022.</p> <p>There was no sexual harassment case reported so far at all OU.</p> <p>SDPB has introduced the new Terms of Reference (TOR) for Gender Representatives and Gender Committee, dated March 2021 which supersede the previous Gender Committees Gender Committee Handbook, First Edition 2014. In this new TOR, a more definitive roles, and responsibilities as well as governance structure and programmes were added in.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>There is no discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder's consultation, worker's interview, complaint book and trade union meeting. Sighted the job description of each</p>	Complied

		workers mention the same regardless of skin colour, religion, race or caste	
<b>Criterion 6.2:</b> 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).			
6.2.1	<p><b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>All employees have signed employment contracts (for foreigners), and employment letters (for locals) Each document is dated and contains provisions related to duration of contract, job scope, place of work, roles and responsibilities of employers and employees, wages, allowances, working hours, mutual termination notice, holidays, paid annual leave, medical leave, other benefits, deductions, etc. These documents were prepared in Bahasa Malaysia, a language which is understood by all workers from Malaysia, Indonesia, India and Bangladesh.</p>	Complied
6.2.2	<p><b>(C)</b> 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>Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. The terms are in compliance with Employment Act 1955.</p> <p>Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to the Employment Act 1955. As at current status, there was none has crossed 80 hours of overtime. Verified the payslips, the payment and calculation of overt time well distributed.</p> <p>The overtime rate after 8 hours daily rated is: upkeeping</p> <ul style="list-style-type: none"> <li>- Mon - Sat – daily rated / 8 hours x 1.5</li> <li>- Sunday - daily rated / 8 hours x 2.0</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- Public holiday – daily rated / 8 hours x 3.0</li> <li>The overtime rate after 8 hours piece rated is: harvesters</li> <li>- Mon - Sat – flat rate</li> <li>- Sunday – flat rate x 2.0</li> <li>- Public holiday – flat rate x 3.0</li> </ul>	
<p>6.2.3</p>	<p><b>(C)</b> 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 punch cards, workers’ employment contracts and payslips, evidence was available that the estates 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 (SOCSSO, EPF, EIS) and non-statutory deductions (e.g. electricity bills, etc) in accordance with the relevant laws and Labour Office permits. Sighted permits and approvals as per the following:</p> <p><u>Flemington POM</u></p> <p>Sime Darby Plantation Sdn Bhd has obtained approval from <i>Jabatan Tenaga Kerja Semenanjung Malaysia</i> for the following:</p> <ul style="list-style-type: none"> <li>i. Ref. No.: BHG. PU/9/129 JLD 3 (53) dated 06/07/2017 for deduction of wages for electricity bill.</li> <li>ii. Ref. No.: BHG. PU/9/134 JLD 9 (11) dated 27/03/2017 for overtime limit for 130 hours</li> </ul> <p>Payroll documents, namely the payslip, also give accurate information on compensation for all work done. This includes those who receive daily-rated wages, piece rated wages, payment for any overtime work done, and public holiday pay.</p> <p>Sighted sample of pay slips checked for employees in 3 different production trends (low, normal and peak production month) as per below:</p>	<p>Complied</p>

		<p><u>Flemington POM</u> (8 workers out of 97 workers sampled)          Total of 8 worker’s payslips checked from out of 97 numbers of workers consist of full-time workers for the month of September 2021 (peak), May 2022 (normal) and July 2022 (low) as the following:</p> <ul style="list-style-type: none"> <li>a. Employee ID: 24816, joined date: 3/1/2005, position: mill check roll labour</li> <li>b. Employee ID: 24851, joined date: 7/1/2008, position: mill check roll labour</li> <li>c. Employee ID: 82041, joined date: 25/7/2012, position: mill check roll labour</li> <li>d. Employee ID: 123501, joined date: 20/7/2016, position: mill check roll labour</li> <li>e. Employee ID: 151656, joined date: 14/6/2019, position: mill check roll labour</li> <li>f. Employee ID: 166690, joined date: 20/12/2021, position: mill check roll labour</li> <li>g. Employee ID: 167273, joined date: 17/1/2022, position: mill check roll labour</li> <li>h. Employee ID: 170357, joined date: 16/7/2022, position mill check roll labour</li> </ul> <p><u>Bagan Datoh Estate</u> (13 workers out of 254 workers sampled)          Total of 13 worker’s payslips checked from out of 254 numbers of workers consist of full-time workers for the month of September 2021 (peak), May 2022 (normal) and July 2022 (low) as the following:</p>	
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		<ul style="list-style-type: none"> <li>a. Employee ID: 161021, joined date: 26/11/2020, position: GW (daily rated worker)</li> <li>b. Employee ID: 163790, joined date: 8/6/2021, position: sprayer, CDA, PD (daily rated worker)</li> <li>c. Employee ID: 92333, joined date: 1/7/2013, position: general worker (daily rated workers)</li> <li>d. Employee ID: 113342, joined date: 9/5/2015, position: general worker (daily rated workers)</li> <li>e. Employee ID: 134125, joined date: 10/6/2017, position: general worker (daily rated workers)</li> <li>f. Employee ID: 156891, joined date: 16/12/2019, position: general worker (daily rated workers)</li> <li>g. Employee ID: 143648, joined date: 9/7/2018, position: harvester (piece rated workers)</li> <li>h. Employee ID: 144779, joined date: 13/8/2018, position: harvester (piece rated workers)</li> <li>i. Employee ID: 101590, joined date: 5/5/2014, position: manuring (piece rated workers)</li> <li>j. Employee ID: 78194, joined date: 3/2/2012, position: general worker (daily rated workers)</li> <li>k. Employee ID: 155819, joined date: 30/10/2019, position: general worker (daily rated workers)</li> <li>l. xi) Employee ID: 107817, joined date: 20/11/2014, position: harvester (piece rated workers)</li> <li>m. Employee ID: 167482, joined date: 1/2/2012, position: general worker (daily rated workers)</li> </ul> <p><u>Flemington Estate</u> (10 workers out of 148 workers sampled)</p>	
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		<p>Total of 10 worker’s payslips checked from out of 148 numbers of workers consist of full-time workers for the month of September 2021 (peak), May 2022 (normal) and July 2022 (low) as the following:</p> <ul style="list-style-type: none"> <li>a. Employee ID: 149650, joined date: 3/4/3019, position: FFB evacuation (piece rated workers)</li> <li>b. Employee ID: 21279, joined date: 1/1/2009, position: GW (daily rated workers)</li> <li>c. Employee ID: 108091, joined date: 22/11/2014, position: field worker (piece rated workers)</li> <li>d. Employee ID: 153776, joined date: 28/8/2019, position: field worker (piece rated workers)</li> <li>e. Employee ID: 121796, joined date: 30/5/2016, position: GW (daily rated workers)</li> <li>f. Employee ID: 111768, joined date: 9/03/2015, position: FFB evacuation (piece rated workers)</li> <li>g. Employee ID: 149150, joined date: 11/3/2019, position: field worker (piece rated workers)</li> <li>h. Employee ID: 21234, joined date: 25/11/1996, position: GW (daily rated workers)</li> <li>i. Employee ID: 116591, joined date: 8/9/2015, position: FFB evacuation (piece rated workers)</li> <li>j. Employee ID: 142675, joined date: 14/5/2018, position: FFB evacuation (piece rated workers)</li> </ul> <p><u>Sg Samak Estate</u> (11 workers out of 192 workers sampled)</p> <p>Total of 11 worker’s payslips checked from out of 192 numbers of workers consist of full-time workers for the month of September</p>	
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		<p>2021 (peak), May 2022 (normal) and July 2022 (low) as the following:</p> <ul style="list-style-type: none"> <li>a. Employee ID: 102776, joined date: 25/6/2014, position: GW (oil palm harvester)</li> <li>b. Employee ID: 158031, joined date: 5/2/2020, position: GW (oil palm harvester)</li> <li>c. Employee ID: 155174, joined date: 17/8/2019, position: FFB cutter (piece rated workers)</li> <li>d. Employee ID: 102231, joined date: 3/6/2014, position: field worker (piece rated workers)</li> <li>e. Employee ID: 151754, joined date: 21/6/2019, position: GW (daily rated workers)</li> <li>f. Employee ID: 155882, joined date: 23/10/2019, position: GW (daily rated workers)</li> <li>g. Employee ID: 102231, joined date: 3/6/2014, position: field worker (piece rated workers)</li> <li>h. Employee ID: 168476, joined date: 4/4/2022, position: field worker (piece rated workers)</li> <li>i. Employee ID: 132166, joined date: 23/3/2017, position: GW (piece rated workers)</li> <li>j. Employee ID: 166147, joined date: 11/6/2019, position: field worker (piece rated workers)</li> <li>k. Employee ID: 166582, joined date: 1/12/2021, position: field worker (piece rated workers)</li> </ul> <p><u>Sabak Bernam Estate</u> (11 workers out of 117 workers sampled)          Total of 11 worker's payslips checked from out of 117 numbers of workers consist of full-time workers for the month of September</p>	
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		<p>2021 (peak), May 2022 (normal) and July 2022 (low) as the following:</p> <ul style="list-style-type: none"> <li>a. Employee ID: 19999, joined date: 2/1/1991, position: GW (oil palm harvester)</li> <li>b. Employee ID: 20022, joined date: 1/3/2003, position: GW (oil palm harvester)</li> <li>c. Employee ID: 86635, joined date: 5/1/2013, position: field worker (daily rated workers)</li> <li>d. Employee ID: 107933, joined date: 22/11/2014, position: field worker (piece rated workers)</li> <li>e. Employee ID: 120670, joined date: 2/4/2016, position: filed worker (daily rated workers)</li> <li>f. Employee ID: 129015, joined date: 12/3/2016, position: filed worker (daily rated workers)</li> <li>g. Employee ID: 143002, joined date: 21/5/2018, position: field worker (piece rated workers)</li> <li>h. Employee ID: 153026, joined date: 2/8/2019, position: field worker (piece rated workers)</li> <li>i. Employee ID: 166772, joined date: 3/1/2022, position: filed worker (daily rated workers)</li> <li>j. Employee ID: 155844, joined date: 26/10/2019, position: field worker (piece rated workers)</li> <li>k. xi) Employee ID: 155038, joined date: 27/09/2019, position: field worker (daily rated workers)</li> </ul>	
6.2.4	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on</p>	<p>The basic amenities and facilities at the quarters provided by the company to the workers includes electricity, water and domestic waste disposal. Electricity and water were supplied by government and deducted from salary. Seen the budget for housing repairs,</p>	Complied

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	<p>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>sanitation, garden upkeep and CAPEX &amp; OPEX from all operating units.</p> <p>Seen the record for weekly line site inspection done by Medical Assistant (estate) and QA (mill) in weekly basis. On top weekly inspection, Employee Welfare Committee (EWC) inspection carried out on every 3 months once prior to EWC meeting. Records of weekly inspection and 3 monthly inspections summarized as per below:</p> <table border="1" data-bbox="1142 638 1926 1125"> <thead> <tr> <th>Estate/Mill</th> <th>Date of weekly inspection</th> <th>EWR inspection</th> </tr> </thead> <tbody> <tr> <td>Flemington POM</td> <td>5/8/22, 12/8/22</td> <td>5/8/2022 and 14/5/2022</td> </tr> <tr> <td>Bagan Datoh Estate Estate</td> <td>12/8/22, 5/8/22</td> <td>20/1/22, 5/4/22</td> </tr> <tr> <td>Sg Samak Estate</td> <td>1/8/22, 8/8/22</td> <td>14/7/2022 and 15/4/2022</td> </tr> <tr> <td>Sabak Bernam Estate</td> <td>4/8/22, 11/8/22</td> <td>15/8/2022 20/4/2022</td> </tr> <tr> <td>Flemington Estate</td> <td>14/8/22, 7/8/22</td> <td>14/7/2022, 3/1/2022</td> </tr> </tbody> </table> <p>For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2 people per room. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utilizes VMO (visiting medical officer) has visited estate's clinic on fortnightly basis as minimum. At Sg Samak Estate, latest</p>	Estate/Mill	Date of weekly inspection	EWR inspection	Flemington POM	5/8/22, 12/8/22	5/8/2022 and 14/5/2022	Bagan Datoh Estate Estate	12/8/22, 5/8/22	20/1/22, 5/4/22	Sg Samak Estate	1/8/22, 8/8/22	14/7/2022 and 15/4/2022	Sabak Bernam Estate	4/8/22, 11/8/22	15/8/2022 20/4/2022	Flemington Estate	14/8/22, 7/8/22	14/7/2022, 3/1/2022	
Estate/Mill	Date of weekly inspection	EWR inspection																			
Flemington POM	5/8/22, 12/8/22	5/8/2022 and 14/5/2022																			
Bagan Datoh Estate Estate	12/8/22, 5/8/22	20/1/22, 5/4/22																			
Sg Samak Estate	1/8/22, 8/8/22	14/7/2022 and 15/4/2022																			
Sabak Bernam Estate	4/8/22, 11/8/22	15/8/2022 20/4/2022																			
Flemington Estate	14/8/22, 7/8/22	14/7/2022, 3/1/2022																			

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		<p>visit was carried out on 1/8/22 and 8/8/22 and 19/7/22 and 26/7/22 at Sabak Bernam Estate.</p> <p>Compliance with Employee's Minimum Standards of Housing, Accommodations and Amenities Act 1990 and was not effectively demonstrated. During site visit at line site (block D), common/main drain sighted with undergrowth which blocked the free flow of water. Based on social dialog tracker and OPP none of this issue highlighted. Observed at line site (block C), stagnant water was sighted at newly repaired outlet drain at the house backyard. Thus, a major NC was issued.</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>There were sundry shops located in the estates compound and the estates are nearby to the nearest town. The workers can easily access to adequate, sufficient and affordable foods and goods. Price of goods were displayed at the sundry shops. Workers interview confirmed that they can easily purchase foods at the nearest shop or choose to go nearest town away from the estate by using their transport until the main guard post and public transport to the nearest town.</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><b>PROCEDURAL NOTE:</b>          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</p>	<p>Sime Darby Plantation Berhad – Flemington POM has provided the decent living wage for both local and foreign workers based on PREVAILING WAGES assessment. It includes wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc. The payslip sighted in clause 6.2.1 showed that the salary received complied with the minimum wage order 2020 and the decent living wage set up by the group which is foreign worker is RM 2,061.19/worker and local RM 2,010.63/worker.</p> <p>Note: Until housing basket can be determine (work in progress-data type need to pull from various departments and further</p>	Complied

<p>benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• 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</li> <li>• 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.</li> </ul> <p>- Minor compliance -</p>	<p>segregated), in the interim SDP will refer to CA amount of RM125.</p>	
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6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers 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 4 Flemington Palm Oil Mill and supply bases. No contract worker was employed except for supporting work.</p>	Complied
<p><b>Criterion 6.3:</b> 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><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</li> <li>• Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</li> <li>• Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively.</li> </ul> <p>During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join union</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>NUPW Committee was established in Flemington Palm Oil Mill and the last meeting was conducted on 2/6/2022. Issues were raised during the meeting and recorded in the meeting minutes. Management plan was developed for the issues raised by the NUPW representatives and action has been taken accordingly. Interviewed</p>	Complied

		<p>with the NUPW representatives confirmed that the issues raised during the meeting were resolved. He informed that there is no any further pending issue reported during the time of audit. Sighted meeting minutes at other operating units as per below:</p> <ul style="list-style-type: none"> <li>a. Flemington Estate – 30/11/2021</li> <li>b. Sg Samak Estate – 05/07/2021</li> <li>c. Sabak Bernam Estate – 23/02/2022</li> <li>d. Bagan Datoh Estate – 05/01/2022</li> </ul>	
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Interviewed with the NUPW representatives and the workers confirmed that the election of the representatives were elected freely by the workers without any interference of management.</p>	Complied
<b>Criterion 6.4: Children are not employed or exploited.</b>			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</li> <li>• Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</li> <li>• Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the wellbeing of our communities.</li> <li>• Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognise that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use.</li> <li>• Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees.</li> <li>• Protecting the Rights of Children: We seek to promote the wellbeing of children and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography.</li> </ul> <p>Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired.</p> <p>For contractors, the clause 5.8 abolishment of child labour &amp; protecting the rights of children available in the Vendor COBC dated 21/06/2020, Human Rights Charter-protecting the rights of children.</p>	
6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liason &amp; Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).</p>	Complied

6.4.3	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Employee Master Listing and through interviewed with the stakeholders.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders.</p>	Complied
<p><b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>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.</p> <p>The policy was communicated to the workers conducted on 11/3/22 at Sabak Bernam Estate and 4/7/2022 in Sg Samak Estate. Other session, carried out on 11/3/2022 at Bagan Datoh Estate.</p>	Complied
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>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.</p> <p>The policies were communicated to workers on 11/3/22 at Sabak Bernam Estate. Gender Committee of Sg Samak Estate has conducted briefing to the female workers on 4/7/2022 related to the sexual harassment and reproductive rights. Seen the training</p>	Complied

		attendance list. The workers have to answer quiz to ensure their understanding on the training.	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Briefing of the new mother assessment was conducted during the Gender Committee meeting. This has been confirmed during interview and document review during site audit. Related request has been approved by the management. Noted outcome from the assessment as per the following:</p> <p>a. Sabak Bernam Estate – 1/3/2022 (no request by the new mother)</p> <p>b. Flemington POM – 22/11/21 (request to breast feed during working hours)</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has developed Gender Committee Handbook, First Edition for implementation framework and guidelines where grievance reporting procedure for gender was developed. Any cases must be reported to Social &amp; Environment Projects Unit of the PSQM Department. Incident report template was established. Flowchart and Procedure on Handling Social Issues, version 1, dated 01/11/2008 was implemented as well. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in <a href="http://www.simedarbyplantation.com/corporate/governance/whistleblowing">http://www.simedarbyplantation.com/corporate/governance/whistleblowing</a>. 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</p>	Complied

		resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.	
<b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees.</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Interviewed with the workers confirmed that no forced and trafficked labor in SOU4. The Indian workers informed that they did not pay any recruitment fee to agent as they employed directly by Sime Darby. The terms and conditions offered by the company were similar in their home country and when arrived in the plantations. No contract substitution has occurred. They keep their own passport and no passport retained by the management. They can access to the passport freely. Overtimes was monitored by the company and the workers are giving freedom to choose to overtime and resign. There was no penalty for termination of employment if they wish to terminate the contract earlier as per the employment contract signed.</p> <p>If the workers in the mill who want to work for overtime, they will need to fill in the Overtime Details form. Those who worked on rest day and public holiday is required to fill in the application form <i>Kerja/ Kerja lebih masa pada hari rehat &amp; Kerja/ kerja lebih masa pada hari cuti am</i>. Approval from the Supervisor and Assistant is required.</p>	Complied
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB has implemented a Sime Darby's Human Rights Charter revised 2020 and can be easily access via <a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a> where they committed as below:</p> <ol style="list-style-type: none"> <li>a) Providing equal opportunity</li> <li>b) Respecting freedom of association</li> <li>c) Eradicating any form of exploitation</li> <li>d) Providing decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic</li> </ol>	Complied

		<p>needs</p> <p>e) Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution.</p> <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>	
<p><b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
<p>6.7.1</p>	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>OSH Committee Chart for year 2022 was available accordingly with adequate representatives from employee and employer for the mill and all estates. Appointed letter for OSH Committee members available with latest issuance for year 2022. The mill and estate managers were appointed as the chairman of the respective OSH Committees. Verified also that appointment letters for Employees Representative and Employer Representative has been issued accordingly with the respective roles &amp; responsibilities clearly stated in the appointment letters</p> <p>All the sampled estates and mill managements have conducted regular two-way communication with their employees through the quarterly OSH committee meetings. Minutes of meetings were made available for verification which dated as follows:</p> <ol style="list-style-type: none"> <li>1. <u>Flemington POM</u></li> </ol>	<p>Complied</p>

		<p>OSH meeting conducted on quarterly basis. For year 2021/2022 sampled the meeting minutes dated 23/06/2022 (02<sup>nd</sup> 2022), 28/03/2022 (1<sup>st</sup> 2022) and 21/12/2022 (4<sup>st</sup> 2022).</p> <p>2. <u>Sungai Samak Estate</u>          OSH meeting conducted on quarterly basis. For year 2021/2022 sampled the meeting minutes dated 29/07/2022 (03<sup>rd</sup> 2022), 28/04/2022 (2<sup>nd</sup> 2022) and 28/01/2022 (1<sup>st</sup> 2022).</p> <p>3. <u>Sabak Bernam Estate</u>          OSH Meeting conducted don quarterly basis. For year 2021/2022 sampled the meeting minutes dated 25/05/2022 (2<sup>nd</sup>-2022), 25/02/2022 (1<sup>st</sup>-2022), 25/11/2021 (5<sup>th</sup>-2021) and 07/10/2021 (4<sup>th</sup> 2021).</p> <p>4. <u>Bagan Datoh Estate</u>          OSH Meeting conducted don quarterly basis. For year 2021/2022 sampled the meeting minutes dated 11/07/2022 (2<sup>nd</sup>-2022), 22/03/2022 (1<sup>st</sup>-2022), 14/12/2021 (4<sup>th</sup>-2021) and 26/10/2021 (3<sup>rd</sup> 2021).</p> <p>5. <u>Flemington Estate</u>          OSH Meeting conducted don quarterly basis. For year 2021/2022 sampled the meeting minutes dated 28/06/2022 (3<sup>rd</sup> -2022), 22/03/2022 (2<sup>nd</sup>-2022) and 07/01/2022 (1<sup>st</sup>-2022).</p> <p>Among the agenda discussed are:</p> <ul style="list-style-type: none"> <li>- Confirmation of minutes previous meeting</li> <li>- Workplace inspection report</li> <li>- Accident report</li> <li>- Medical surveillance &amp; Audio metric</li> <li>- Status of Safety Program &amp; Environmental</li> </ul>	
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		<ul style="list-style-type: none"> <li>- HIRARC</li> <li>- Complaint from Employee/External Party</li> <li>- Other matters</li> </ul> <p>Workplace inspections are made prior to the ESH meeting. The respective Managers were appointed as ESH Chairman (PIC) through letter signed by Regional CEO. All letters were made available for verification.</p>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency procedures have been communicated to all employees, contractors and visitors. Fire Evacuation drill conducted once at least once a year at mill and estates.</p> <p>Training on Fire Drill and Evacuation were conducted at the mill and all estates with the training documents available for verification as below:</p> <ol style="list-style-type: none"> <li>1. Fire Drill Refresher Training conducted at Sungai Samak Estate conducted on 10/09/2021 attended by all workers and staffs.</li> <li>2. Fire Drill conducted at Sabak Bernam Estate on 19/07/2022 for all workers and staffs.</li> <li>3. Fire Training with BOMBA conducted on 17/03/2022 at Flemington POM together with the mill workers and staffs.</li> <li>4. Fire Training Program conducted on 08/07/2022 at Bagan Datoh Estate for all workers on 08/07/2022.</li> <li>5. Fire Drill conducted on 06/10/2021 at Ladang Buloh Estate, Teluk Buloh Division.</li> </ol> <p>Accident and emergency procedures are available in English/Bahasa Malaysia and this is understood by the responsible workers, staff or executives involved in the operation. Good understanding level observed among the workers during workers interview session.</p>	Complied

		<p>Emergency response team organisation chart has been established accordingly in mill and estates. The team consist of accident investigation, firefighting, search &amp; rescue, flood, first aid and spillage control teams. Verified also the emergency evacuation map has been established and pasted at relevant locations seen able by all workers.</p> <p>Fire extinguisher (ABC Powder) assessed during the site observation were available and within the expiry date. Portable emergency eye wash &amp; shower facility available at chemical store, workshop and mixing area as applicable.</p> <p>Training for First Aid is conducted on annual basis. Adequate trained first aiders were available at all sites. First aid equipment is available at worksites. During the site visit there is evident that First Aid Box is available at the relevant workplace area. Appropriate DOSH guideline been used as first aid kit section control. First Aid Trainings were provided to all selected First Aid Box holders and trainings documents were available for verification as below.</p> <ol style="list-style-type: none"> <li>1. First Aid Training conducted at Sungai Samak Estate on 20/07/2022.</li> <li>2. First Aid Training conducted at Sabak Bernam Estate on 21/07/2022</li> <li>3. First Aid Refresher Training conducted at Flemington POM for all workers on 05/04/2022.</li> <li>4. First Aid Training conducted at Bagan Datoh Estate for first aiders on 21/03/2022.</li> <li>5. First Aid Box Training conducted at Flemington Estate for first aid box holders on 17.08.2022.</li> </ol>	
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		<p>Accident monthly report has been maintained and being discussed in the Quarterly OSH Meeting. JKPP 6 been submitted to DOSH on accidents involving medical leave of more than 4 days. Verified that the accident investigation has been carried out accordingly along with HIRARC review. Relevant DOSH Registration for JKPP 8 and JKPP 6 were available at the respective sites for verification. Details of LTA has been listed out under indicator 6.7.5 of the report.</p> <ol style="list-style-type: none"> <li>1. Sungai Samak Estate – JKPP 8 (Reference Number: JKPP 8/113241/2021) submitted on 14/03/2022.</li> <li>2. Flemington POM – JKPP 8 (Reference Number: JKPP 8 /70203/2021) submitted on 11/01/2022.</li> <li>3. Bagan Datoh Estate – JKPP 8 (Reference Number: JKPP 8 /103258/2021) submitted on 22/01/2022.</li> <li>4. Flemington Estate – JKPP 8 (Reference number: JKPP 8/ 105331/2021) submitted on 20/01/2022.</li> </ol>	
6.7.3	<p><b>(C)</b> 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>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang, Harvesting Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</p>	Complied

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<p>6.7.4</p>	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees by the organization. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for May 2022 – July 2022 for POM and Estate.</p> <table border="1" data-bbox="1137 507 1930 1299"> <thead> <tr> <th>Mill/Estate</th> <th>Month</th> <th>Total Workers</th> <th>Contribution</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Sungai Samak Estate</td> <td>May 2022</td> <td>222</td> <td>RM 9,605.90</td> </tr> <tr> <td>June 2022</td> <td>216</td> <td>RM 9,606.60</td> </tr> <tr> <td>July 2022</td> <td>215</td> <td>RM 9,003.00</td> </tr> <tr> <td rowspan="3">Sabak Bernam Estate</td> <td>May 2022</td> <td>160</td> <td>RM 5,780.60</td> </tr> <tr> <td>June 2022</td> <td>154</td> <td>RM 6,529.30</td> </tr> <tr> <td>July 2022</td> <td>151</td> <td>RM 5,925.60</td> </tr> <tr> <td rowspan="3">Flemington POM</td> <td>May 2022</td> <td>96</td> <td>RM 4,591.20</td> </tr> <tr> <td>June 2022</td> <td>94</td> <td>RM 4,382.90</td> </tr> <tr> <td>July 2022</td> <td>96</td> <td>RM 5,114.70</td> </tr> <tr> <td rowspan="3">Flemington Estate</td> <td>May 2022</td> <td>143</td> <td>RM 5,925.10</td> </tr> <tr> <td>June 2022</td> <td>145</td> <td>RM 6,176.30</td> </tr> <tr> <td>July 2022</td> <td>146</td> <td>RM 6,241.90</td> </tr> <tr> <td rowspan="3">Bagan Datoh Estate</td> <td>May 2022</td> <td>261</td> <td>RM 10,489.40</td> </tr> <tr> <td>June 2022</td> <td>257</td> <td>RM 11,284.90</td> </tr> <tr> <td>July 2022</td> <td>245</td> <td>RM 11,134.50</td> </tr> </tbody> </table>	Mill/Estate	Month	Total Workers	Contribution	Sungai Samak Estate	May 2022	222	RM 9,605.90	June 2022	216	RM 9,606.60	July 2022	215	RM 9,003.00	Sabak Bernam Estate	May 2022	160	RM 5,780.60	June 2022	154	RM 6,529.30	July 2022	151	RM 5,925.60	Flemington POM	May 2022	96	RM 4,591.20	June 2022	94	RM 4,382.90	July 2022	96	RM 5,114.70	Flemington Estate	May 2022	143	RM 5,925.10	June 2022	145	RM 6,176.30	July 2022	146	RM 6,241.90	Bagan Datoh Estate	May 2022	261	RM 10,489.40	June 2022	257	RM 11,284.90	July 2022	245	RM 11,134.50	<p>Complied</p>
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<p>6.7.5</p>	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p>	<p>Occupational Injuries were recorded using the Lost Time Accident metrics as below:</p>	<p>Complied</p>																																																						

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- Minor compliance -	Operating Unit		2021		2022		
			Cases	Days	Cases	Days	
	Fleminton POM		2	110	2	70	
	Sungai Samak Estate		5	8	3	55	
	Sabak Bernam Estate		1	15	2	71	
	Flemington Estate		2	74	4	111	
	Bagan Datoh Estate		5	178	0	0	
	Records of all accidents are kept and recorded in OSH Performance Monthly Report and reported to RSQM on monthly basis. Reviewed the monthly report for the month of January - July 2022. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems on January 2022.						
<b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b>							
<b>Criterion 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.							
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Barn owls Tyto Alba has been introduced for biological control of rats. Barn owl boxes are constructed at the rate of 1 box to 10ha. Census records show that there was minimal outbreak of leaf eating pest. Although there have					Complied

		<p>been minimal outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators and further reduce the outbreak. The estates have planted beneficial plants such as Cassia cobanensis and Turnera subulata and Antigonon leptopus.</p> <p>Among the specific IPM Plans that have been identified in the estates are:</p> <ol style="list-style-type: none"> <li>1. To increase beneficial plants establishment to 2dm per Ha.</li> <li>2. To have bi-annual barn owl census. To continue maintenance of barn owl boxes.</li> <li>3. To carry out biweekly bagworm census. To treat palm that are effected with bagworms.</li> </ol>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>Species referenced in the Global Invasive Species Database and CABI.org are not used in the estate.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There was no evidence of use of fire for pest control in all the estates.</p>	Complied
<p><b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 01.07.2011. Selected products are specific to the target pest, weed and disease.</p>	Complied

7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides used (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) is maintained by the estate and submitted to the Head Quarters on a monthly basis. Sampled the chemicals used for May 2022 – July 2022 as below: -</p> <table border="1" data-bbox="1144 539 1928 799"> <thead> <tr> <th>Estate</th> <th>May 2022</th> <th>June 2022</th> <th>July 2022</th> </tr> </thead> <tbody> <tr> <td>Sungai Samak Estate</td> <td>0.409</td> <td>0.175</td> <td>0.385</td> </tr> <tr> <td>Sabak Bernam Estate</td> <td>0.151</td> <td>0.185</td> <td>0.187</td> </tr> <tr> <td>Bagan Datoh Estate</td> <td>0.350</td> <td>0.380</td> <td>0.350</td> </tr> <tr> <td>Flemington Estate</td> <td>0.993</td> <td>1.341</td> <td>0.284</td> </tr> </tbody> </table>	Estate	May 2022	June 2022	July 2022	Sungai Samak Estate	0.409	0.175	0.385	Sabak Bernam Estate	0.151	0.185	0.187	Bagan Datoh Estate	0.350	0.380	0.350	Flemington Estate	0.993	1.341	0.284	Complied
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7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The estate has implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan.</p> <p>Sighted during the site visit at the estate, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas.</p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was eliminated and in its place Acephate is used.</p>	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>	<p>There is no evidence of prophylactic use of pesticides in the estate.</p>	Complied																				
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated</p>	<p>Sighted in the Chemical Registers showed that only class III &amp; IV chemicals were used at the estate. During the site visit to the chemical store it was justified that there were only class II, III and IV chemicals being used. Paraquat was eliminated. In its place,</p>	Complied																				

	<p>by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> <li>a) Judgment of the threat and verify why this is a major threat</li> <li>b) Why there is no other alternative which can be used</li> <li>c) Which process was applied to verify why there is no other less hazardous alternative</li> <li>d) What is the process to limit the negative impacts of the application</li> <li>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</li> </ul> <p>- Minor compliance -</p>	<p>alternatives such as Glyphosate was used instead. Monocrotophos was eliminated and in its place, Acephate is used.</p>	
7.2.6	<p><b>(C)</b> 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>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers in the estate.</p> <p>Sampled the training conducted for pesticide handlers as below: -</p> <ol style="list-style-type: none"> <li>1. Sprayer Training at Sungai Samak Estate: 20/05/2022</li> <li>2. Chemical Handling Training at Bagan Datoh Estate: 21/06/2022</li> <li>3. Chemical Handling Training with Sprayers at Flemington Estate: 10/06/2022.</li> </ol>	Complied
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and estate's Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring</p>	Complied

		donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.	
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 -	All chemical containers were reused as premix containers to transport diluted chemicals to the fields for application purpose. Otherwise the unused chemical containers are triple rinsed and punctured before being disposed to recycle waste collector/licensed schedule waste collector.	Complied
7.2.9	<b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	No aerial spraying for pesticide were done in the estate.	Complied
7.2.10	<b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	Medical Surveillance was conducted in each estates for workers exposed to organophosphates and hazardous fumes, in compliance with the Chemical Hazardous Risk Assessment under USECHH Regulations 2000. Records were available as below. <ol style="list-style-type: none"> <li>1. <u>Sungai Samak Estate</u>            Medical Surveillance was conducted at Klinik K.S. Tan for 10 workers deemed to be exposed to organophosphate at the estate. The results indicated that all workers were safe to work.</li> <li>2. <u>Sabak Bernam Estate</u>            Medical Surveillance was conducted at Sabak Dispensary for 16 estate workers deemed to be exposed to organophosphate. The results indicated that all workers were deemed fit to work.</li> </ol>	Complied

		<p>3. <u>Bagan Datoh Estate</u> Medical Surveillance was recently conducted on 21/07/2022 at Klinik &amp; Surgeri Lee. The results have not been provided by the clinic as of the audit date. For last year's medical surveillance assessment, a total of 21 workers were examined at Klinik &amp; Surgeri Lee on 05/08/2021. The results indicated that all 21 workers were fit to continue work.</p> <p>4. <u>Flemington Estate</u> Medical Surveillance was conducted at Sabak Dispensary on 26/11/2021 for 22 workers exposed to hazardous chemicals. The results indicated that all workers were fit to continue work.</p>			
7.2.11	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 4 Operating Units have prohibited women workers who are confirmed pregnant or breast-feeding to handle chemicals as per Gender Policy and Occupational Safety and Health Policy signed by the Managing Director on January 2015.</p> <p>It was sighted during the visit to the stores there were signages stating that pregnant and breast-feeding women are not allowed to enter the chemical stores.</p> <p>Interview with the female sprayers indicated that they are aware that pregnant and breast-feeding women are prohibited from engaging with chemical related works.</p>	Complied		
<p><b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>					
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>SOU 04 Flemington Mill and all the 4 estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2022 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center;">Receptor</td> <td style="width: 50%; text-align: center;">Sources</td> </tr> </table>	Receptor	Sources	Non-compliance
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7.3.2	<p data-bbox="255 647 1113 708">Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p data-bbox="255 719 501 746">- Minor compliance -</p>	<p data-bbox="1137 647 1930 740">In Flemington POM and the estates in SOU 04, procedure SD/SDP/PSQM (ESH)/203-EN1 – Scheduled Wastes (Hazardous Waste) Management has been established.</p> <ul style="list-style-type: none"> <li data-bbox="1137 751 1930 815">a. Management and disposal of waste water 2022 has been established compiled by Assistant Engineer/Assistants/Staff.</li> <li data-bbox="1137 826 1930 890">b. Waste Management Plan 2022 has been established prepared by QA and verified by the Assistant Engineer/Assistants/Staff.</li> <li data-bbox="1137 901 1930 965">c. Waste Management Plan 2022 has been established in Jan 2022.</li> <li data-bbox="1137 976 1930 1129">d. Based on Environmental Impact Evaluation (file no: SM/5.2/EIE) and Environment Aspect and Impact Identification (file no: SM/5.2/EAI) improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination.</li> <li data-bbox="1137 1141 1930 1267">e. Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.</li> <li data-bbox="1137 1278 1930 1401">f. Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of</li> </ul>	Complied		

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scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The CU scheduled waste is disposed to the following vendors registered with DOE. Used lubricants oil and used batteries were collected by SDI upon completion of every vehicles/engines servicing. DOE has made approval to authorize SDI via letter dated 06/9/2011. DOE letter of authority was sighted and verified. SW 404 are despatched to Edgenta Mediserve Sdn Bhd.

Estate	Date	SW 410	SW 409	SW 305	SW 404	SW 102
Sungai Samak Estate	29/06/22	-	1.290	-	-	-
	10/05/22	-	0.337	0.400	0.001	-
	15/11/21	-	-	-	0.002	-
	18/10/21	-	-	0.680	-	-
Sabak Bernam Estate	22/10/21	-	-	-	0.001	-
	22/01/22	-	-	-	0.010	-
	03/02/22	0.038	-	0.109	-	-
	17/11/21	0.053	-	0.449	-	-
Bagan Datoh Estate	06/07/22	0.044	-	0.808	-	-
	15/06/22	0.010	-	0.305	-	-
	25/04/22	-	-	-	0.001	-
	23/07/22	-	-	-	0.002	-



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		respective contractors (e.g Tiong Weei Enterprise) for the transportation to the municipal landfill (Alam Avani Sdn Bhd Changkat Jong Perak	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	There was no land preparation in SOU 04 Mill and Estates by burning ever since SDB practiced zero burning as per the policy in: a. EQMS SOP Section-B2 under felling/clearing & land preparation b. Carbon Policy  As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate. No fire was used for waste disposal.	Complied
<b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	SOU 04 continued to use and implement SOPs for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOPs were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOPs.  a. Agriculture Reference Manual (ARM) dated 01/07/2011, b. Estate Quality Management System (EQMS) Manual dated 01/11/2008, c. Safety Standard Operating Procedures (SSOP) dated 25/02/2015, d. Sustainable Plantation Management System Manual (SPMS), e. "Guidelines On River Management" Manual, ESH Management System Manual dated 01/07/2012, f. Occupational Safety and Health Manual dated 03/03/2008,	Complied

		<p>g. Pictorial Safety Standards and Security Guidelines (PSS). h. Plantations/Mill Quality Management System (PQMS/MQMS) std operating manual</p> <p>All the estates and mill operations were guided through the manuals and SOPs. The procedures as documented in the Agriculture Reference Manual were disseminated to the staff/workers through morning briefings and training. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The ARM included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Site inspection and interview with workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.</p>							
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -</p>	<p>Periodic tissue and soil sampling were carried out in the Estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. For all 4 estates Agronomic assessment and fertiliser recommendation was conducted by Sime Darby Research Plant Nutrition &amp; Protection Unit PNP Northern Region to formulate the 2022 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca &amp; B had been were carried out in all estates. The latest being :</p> <table border="1" data-bbox="1151 1289 1921 1347"> <thead> <tr> <th data-bbox="1151 1289 1453 1347">Estate</th> <th data-bbox="1453 1289 1688 1347">Report Date</th> <th data-bbox="1688 1289 1921 1347">Report No</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Estate	Report Date	Report No				Complied
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7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>The Estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of compost. In addition, during replanting, palms were felled, chipped,</p>	Complied																											

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		<p>windowed and left to decompose. Records showed that the estates had applied EFB at 35 tons/ha and records showed that EFB metric ton in 2021/22 was as follows:</p> <table border="1" data-bbox="1151 472 1924 914"> <thead> <tr> <th>Estate</th> <th>Field no</th> <th>Ha</th> <th>Mt</th> <th>Month</th> </tr> </thead> <tbody> <tr> <td>Sungai Samak</td> <td>P02M1</td> <td>68.19</td> <td>1363</td> <td>April - Jun</td> </tr> <tr> <td>Sungai Samak</td> <td>P09A</td> <td>83.60</td> <td>1672</td> <td>Dec - Feb</td> </tr> <tr> <td>Sabak Bernam</td> <td>P14D</td> <td>79.66</td> <td>391.77</td> <td>June</td> </tr> <tr> <td>Sabak Bernam</td> <td>P14E</td> <td>66.64</td> <td>401.68</td> <td>Oct</td> </tr> <tr> <td>Bagan Datoh</td> <td>P12D</td> <td>30.00</td> <td>1210</td> <td>July</td> </tr> <tr> <td>Bagan Datoh</td> <td>P99M</td> <td>9.35</td> <td>375.20</td> <td>May</td> </tr> <tr> <td>Flemington</td> <td>P16F1</td> <td>88.95</td> <td>3558</td> <td>July</td> </tr> <tr> <td>Flemington</td> <td>P17F</td> <td>72.86</td> <td>2914</td> <td>July</td> </tr> </tbody> </table>	Estate	Field no	Ha	Mt	Month	Sungai Samak	P02M1	68.19	1363	April - Jun	Sungai Samak	P09A	83.60	1672	Dec - Feb	Sabak Bernam	P14D	79.66	391.77	June	Sabak Bernam	P14E	66.64	401.68	Oct	Bagan Datoh	P12D	30.00	1210	July	Bagan Datoh	P99M	9.35	375.20	May	Flemington	P16F1	88.95	3558	July	Flemington	P17F	72.86	2914	July	
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<p>7.4.4</p>	<p>Records of fertiliser inputs are maintained.          - Minor compliance -</p>	<p>Fertilizer application program was monitored using records like program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc. Records of programs and applications of fertilizers were reviewed by auditors. Review of the records revealed that the actual fertilizers applied in 2021/22 was in line with the program. The following fertilizers were applied in SOU 04 estates subject to the recommendation by the Agronomist.</p> <table border="1" data-bbox="1151 1166 1924 1361"> <thead> <tr> <th>Fertilizer</th> <th>Kg/palm</th> <th>Application Month</th> </tr> </thead> <tbody> <tr> <td>Borate</td> <td>0.10</td> <td>May/Nov</td> </tr> <tr> <td>NK C1/C2</td> <td>3.00-4.00</td> <td>Sept/Feb</td> </tr> <tr> <td>R Phosphate</td> <td>2.75-3.00</td> <td>April /May</td> </tr> </tbody> </table>	Fertilizer	Kg/palm	Application Month	Borate	0.10	May/Nov	NK C1/C2	3.00-4.00	Sept/Feb	R Phosphate	2.75-3.00	April /May	<p>Complied</p>																																	
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Criterion 7.5: Practices minimise and control erosion and degradation of soils.																																							
7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available. The soil series in the estates were classified as follows:</p> <table border="1" data-bbox="1151 523 1917 970"> <tr> <td>Sungai Samak</td> <td>Sabak Bernam</td> <td>Flemington</td> <td>Bagan Datoh</td> </tr> <tr> <td>Selangor</td> <td>Bernam,</td> <td>Briah</td> <td>Selangor</td> </tr> <tr> <td>Briah</td> <td>Briah,</td> <td>Selangor</td> <td>Jawa,</td> </tr> <tr> <td>Peat</td> <td>Selangor</td> <td>Jawa</td> <td>Bernam,</td> </tr> <tr> <td>-</td> <td>Unclassified</td> <td>Bernam</td> <td>Kangkong</td> </tr> <tr> <td>-</td> <td>-</td> <td>-</td> <td>Sedu,</td> </tr> <tr> <td>-</td> <td>-</td> <td>-</td> <td>Briah</td> </tr> <tr> <td>-</td> <td>-</td> <td>-</td> <td>Selangor</td> </tr> <tr> <td>-</td> <td>-</td> <td>-</td> <td>Tongkang</td> </tr> </table> <p>There were 258.40 ha of peat soils identified in Sungai Samak Estate as per Soil Series Map issued by the AAT – Precision Agriculture Unit dated March 2019.</p>	Sungai Samak	Sabak Bernam	Flemington	Bagan Datoh	Selangor	Bernam,	Briah	Selangor	Briah	Briah,	Selangor	Jawa,	Peat	Selangor	Jawa	Bernam,	-	Unclassified	Bernam	Kangkong	-	-	-	Sedu,	-	-	-	Briah	-	-	-	Selangor	-	-	-	Tongkang	Complied
Sungai Samak	Sabak Bernam	Flemington	Bagan Datoh																																				
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7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Like all SDPB Estates, the estates visited in SOU 04 continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ol style="list-style-type: none"> <li>Slope &amp; River Protection Policy</li> <li>Buffer Zone &amp; 25-degree slope and in item 8 Section 4</li> <li>Land Preparation for Terracing in ARM Manual.</li> </ol>	Complied																																				

		<p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in some mature areas. The cover crop <i>mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>neprolepis biserrata</i> in the inter rows were sighted during the visit. The slope maps for the titled ha were provided by the R&amp;D Precision Agriculture Unit with details as follows:</p> <table border="1" data-bbox="1160 730 1921 1150"> <thead> <tr> <th>Terrain</th> <th>Sungai Samak</th> <th>Sabak Bernam</th> <th>Flemington</th> <th>Bagan Datoh</th> </tr> </thead> <tbody> <tr> <td>0-2</td> <td>100.00</td> <td>100.00</td> <td>100.00</td> <td>100.00</td> </tr> <tr> <td>2-6</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>6-12</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>12-20</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>20-25</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>&gt;25</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Total</td> <td>100%</td> <td>100%</td> <td>100%</td> <td>100%</td> </tr> </tbody> </table>	Terrain	Sungai Samak	Sabak Bernam	Flemington	Bagan Datoh	0-2	100.00	100.00	100.00	100.00	2-6	-	-	-	-	6-12	-	-	-	-	12-20	-	-	-	-	20-25	-	-	-	-	>25	-	-	-	-	Total	100%	100%	100%	100%	
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Total	100%	100%	100%	100%																																							
7.5.3	<p>There is no new planting of oil palm on steep terrain.                      - Minor compliance -</p>	<p>This compliance being addressed in the "<i>Slope and River Protection</i>" signed by the CEO dated Jan 2015 stating the following among others;                      "Slope of &gt;25 degree to be excluded from any new plantation development and replanting program. For slope &lt;25 degree the existing crop all vegetative shall be maintained accordingly".</p>	Complied																																								

<b>Criterion 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	<p><b>(C)</b> 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>	Soil surveys are made and available in a soil map at the estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates. There were 258.40 ha of peat soils identified in Sungai Samak Estate as per Soil Series Map issued by the AAT – Precision Agriculture Unit dated March 2019.	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>There were 258.40 ha of peat soils identified in Sungai Samak Estate as per Soil Series Map issued by the AAT – Precision Agriculture Unit dated March 2019. As addressed in the Sime Darby Plantation 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>a) Protect and enhance forest: "We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:</p> <ul style="list-style-type: none"> <li>i. No new development of peat areas, regardless of depth or location.</li> <li>ii. We will seek to rehabilitate existing plantings on peats where possible.</li> </ul>	Complied
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	Soil surveys are made and available in a soil map at the estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates.	Complied
<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p><b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p>	There is no new planting on peat regardless of depth after 15 November 2018 in existing areas.	Complied

	- Critical (Major) compliance -	There were 258.40 ha of peat soils identified in Sungai Samak Estate as per Soil Series Map issued by the AAT – Precision Agriculture Unit dated March 2019. No other soil categorized as problematic or fragile soil.	
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p><b>PROCEDURAL NOTE:</b>  Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has conducted peat soil verification at Sungai Samak Estate on 119 – 22/2/2019 and documented in Peat Soil Verification at Sungai Samak Estate for RSPO Compliance dated 01/04/2019.</p> <p>a. The verification was conducted by 2 agronomist from Plantation Research and Advisory. Sime Darby Plantation Berhad has inventoried and documented all the peat area 2019 Sime Darby Plantation Berhad RSPO Peat Inventory R1.</p> <p>b. The latest submission to RSPO Secretariat has been done on 09/07/2021.</p> <p>c. As per report, total area planted on peat in Sg. Samak Estate recorded at 258.40 ha.</p>	Complied
7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>Sungai Samak Estate have 258.40 ha of peat area in Yiew Lian Division. The estate has established the Water Management Plan for Peat Area. The management plan was reviewed on annually basis. The monitoring of peat soil subsidence was guided by the following;</p> <p>a. Item 2 – Optimal Water Levels for Coastal/Peat Soil and</p> <p>b. Item 4 – Water-table monitoring of Chapter 10 of Sime Darby Agricultural Reference Manual – Water Management in Coastal and Peat Plantings.</p> <p>c. Guidance in the “Peat Subsidence Gauge Installation SOP” dated 14/03/2016.</p>	Complied

The estate monitored water levels using water level markers in drains and water tubes for ground water levels. Records relating to peat management dated 20/06/2022 as follows;

Field no	tube no	61-90 cm	61-90 cm	61-90 cm
2016A	1	-	-	/
2015A	4	-	-	/
2015B	7	-	-	/
2014A	10	-	-	/
2014B	11	-	-	/
2011A	13	-	-	/
2002D1	15	-	-	/
2004DA	16	-	-	/
2004D	17	-	-	/
2005D	18	-	-	/
2005DA	20	-	-	/
2017A	21	-	-	/
2017B	22	-	-	/
2004M	24	-	-	/
2007MA	26	-	-	/
2006M	28	-	-	/
2008M	29	-	-	/

		<p>There are map showing location of peat subsidence pole at P01B / P02D &amp; with a total 5 piezometer. The peat subsidence monthly monitoring among others as follows</p> <table border="1" data-bbox="1162 555 1917 833"> <thead> <tr> <th>Issue / Area</th> <th>Management Plan</th> <th>PIC</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Water level</td> <td>To maintain water level 40-60 cm on weekly basis</td> <td>Div Staff/AM</td> <td>On-going</td> </tr> <tr> <td>Flushing Out</td> <td>Releasing water during rainy period.</td> <td>Div Staff/AM</td> <td>On-going</td> </tr> </tbody> </table>	Issue / Area	Management Plan	PIC	Date	Water level	To maintain water level 40-60 cm on weekly basis	Div Staff/AM	On-going	Flushing Out	Releasing water during rainy period.	Div Staff/AM	On-going	
Issue / Area	Management Plan	PIC	Date												
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Flushing Out	Releasing water during rainy period.	Div Staff/AM	On-going												
7.7.4	<p><b>(C)</b> A documented water and ground cover management programme is in place.          - Critical (Major) compliance -</p>	<p>The water and ground cover management programme is documented in the Sime Darby Agricultural Reference Manual (Water Management in Coastal and Peat lands) issued on 01.07.2011. Details are described in 7.8.1. individual estates and mill had their respective water management plan mainly to monitor among others the following;</p> <ol style="list-style-type: none"> <li>a. Monitor the quality of main water inlet/outlet for pollutants from estate's operations.</li> <li>b. Contingency during water shortage.</li> <li>c. Field water management - side pit construction</li> <li>d. Adequate field drains</li> <li>e. Reuse/recycle waste water.</li> <li>f. Peat soil water management</li> </ol>	Complied												

		<p>Management strategy for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils) is based on the established ARM, section 10: Water Management In Coastal and Peat Plantings.</p> <p>There were 2 management strategies;</p> <ul style="list-style-type: none"> <li>a. optimal water level monitoring</li> <li>b. and flushing of acid rain water.</li> </ul> <p>Verified management plan for 2022 at Sungai Samak Estate as per criteria 7.7.3. The latest water table was on 20/06/2022, as per monitoring record they maintain water level at 69-90 cm: Sighted record monitoring the water measurement point with details stated in 7.7.3.</p>							
7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>As per latest review on Long Range Replanting Program, the peat area at 116.57 ha were scheduled to be replanted on 2022. The drainability assessment have been conducted on 9 July 2021, and result showed that the area can be replanted</p> <p>According to Siong 2004, "Drainability is defined as the technical feasibility of sustainable drainage by gravity the excess water from the basin peat swamps". This definition was supported by Melling et al 2007, whereby "sustainable drainability in peat soil area, can only be achieved if the mineral subsoil level is above the mean water level at the drainage discharge point." drainability has been classified as follows:</p> <table border="1" data-bbox="1137 1217 1933 1378"> <thead> <tr> <th>Class</th> <th>Status</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Good</td> <td>Excess water in the field can be drained by gravity even during the highest tide and/or during the wet periods.</td> </tr> </tbody> </table>	Class	Status	Remark	1	Good	Excess water in the field can be drained by gravity even during the highest tide and/or during the wet periods.	Complied
Class	Status	Remark							
1	Good	Excess water in the field can be drained by gravity even during the highest tide and/or during the wet periods.							

		<table border="1"> <tr> <td data-bbox="1140 363 1234 576">2</td> <td data-bbox="1234 363 1386 576">Moderately Good</td> <td data-bbox="1386 363 1930 576">Excess water in the field can be drained by gravity &gt;50% of the tidal cycle, sometimes with the help of bunds and flap-gates and/or where water in the plantation can be drained during the wet period before the oil palms start to suffer.</td> </tr> <tr> <td data-bbox="1140 576 1234 751">3</td> <td data-bbox="1234 576 1386 751">Poor</td> <td data-bbox="1386 576 1930 751">Excess water in the field can be drained by gravity &lt;50% of the tidal cycle and/or where water in the plantation cannot sufficiently be drained during the wet period; oil palms start to buffer.</td> </tr> <tr> <td data-bbox="1140 751 1234 932">4</td> <td data-bbox="1234 751 1386 932">Very Poor</td> <td data-bbox="1386 751 1930 932">Excess water in the field cannot be drained by gravity even at lowest tide and/or where water in the plantation cannot sufficiently be drained during the wet period; oil palms start to die.</td> </tr> </table> <p data-bbox="1140 932 1930 1038">Based on the above classification, on SOU 04 is in class 1 and concluding in this report the peat areas in Sg Samak Estate can be replanted.</p>	2	Moderately Good	Excess water in the field can be drained by gravity >50% of the tidal cycle, sometimes with the help of bunds and flap-gates and/or where water in the plantation can be drained during the wet period before the oil palms start to suffer.	3	Poor	Excess water in the field can be drained by gravity <50% of the tidal cycle and/or where water in the plantation cannot sufficiently be drained during the wet period; oil palms start to buffer.	4	Very Poor	Excess water in the field cannot be drained by gravity even at lowest tide and/or where water in the plantation cannot sufficiently be drained during the wet period; oil palms start to die.	
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4	Very Poor	Excess water in the field cannot be drained by gravity even at lowest tide and/or where water in the plantation cannot sufficiently be drained during the wet period; oil palms start to die.										
7.7.6	<p><b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There were no other fragile soils other than peat soils as mentioned under indicator 7.7.3. The management strategy in place for peat soil was guided by;</p> <ol style="list-style-type: none"> <li>Item 2 – Optimal Water Levels for Coastal/Peat Soil and</li> <li>Item 4 – Water-table monitoring of Chapter 10 of Sime Darby Agricultural Reference Manual – Water Management in Coastal and Peat Plantings.</li> <li>Guidance in the "Peat Subsidence Gauge Installation SOP" dated 14/03/2016.</li> </ol>	Complied									

		The estates monitored water levels using water level markers in drains and water tubes for ground water levels.									
7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as “peatland conservation areas”; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ‘RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat’, version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	There is only 258.40 ha of peat soil series available as identified in Sg Samak Estate as identified as per Soil Map prepared by R&D-TTAS Precision Agriculture Unit (NHM) dated November 2011. There is no other area of peat series or set-aside peat lands within the managed areas.	Complied								
<b>Criterion 7.8:</b> 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 04 Mill /estates had established its Water Management Plan 2022 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <p>a. Implementation of rain water harvest,</p> <p>b. Construction of water gate and scheduled water pumping for effective management of field drains and field water level.</p> <p>c. daily monitoring of bund / scheduled maintenance</p> <p>d. Establishment of <i>mucuna bracteata</i> to prevent erosion,</p> <p>e. Side drain at field road to control water, frond stacking,</p> <p>f. Enhancement of ground vegetation at bare ground area.</p> <p>The water sources are as shown below:</p> <table border="1" data-bbox="1137 1270 1928 1351"> <thead> <tr> <th>Water source</th> <th>Usage</th> <th>Monitoring &amp; measurement</th> <th>Review status</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Water source	Usage	Monitoring & measurement	Review status					Complied
Water source	Usage	Monitoring & measurement	Review status								

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		LAP/SYA BAS	Purchased for domestic consumption	Monitoring water supply	Liaison with Authority
		Rain water	Domestic use Workshop Chemical mixing	Rain fall data	Water harvesting for general washing
		Water tank	Emergency water supply	-	Request water supply from other estates
The contingency plan during water shortage					
		Area/ incident	Action steps	PIC	Status
		Water shortage / prolonge d dry season	To obtain water from local authority /Mill catchment To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP	Manager AM/Mill Engineer	As and when required
		Severe water pollution / 	To obtain water from LAP	Manager AM//Mill Engineer	As and when required

Contami nation	To train/educate staff/workers to conserve water  To seek assistance from local authority  To obtain treated water supply from mill's WTP		
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The Estates had implemented water managements plans which covered:

- a. Water shortage contingencies
- b. Water pollution prevention
- c. Reduce wastage
- d. Identification & management of waste waters
- e. Monitoring rainfall
- f. Regular water quality analysis.

Water management plan review date was sighted and verified with records as follows;

Estate/Mill	Review date	Issues
Sungai Samak Estate	03/01/2022	Nil
Bagan Datoh Estate	01/01/2022	Nil
Flemington Estate	20/01/2022	Nil
Sabak Bernam Estate	04/01/2022	Nil
Flemington Mill	23/05/2022	Changes in PIC

		<p>The water reduction plan is shown below;</p> <table border="1"> <thead> <tr> <th data-bbox="1142 451 1355 499">Issues/Areas</th> <th data-bbox="1355 451 1803 499">Action Steps</th> <th data-bbox="1803 451 1924 499">Status</th> </tr> </thead> <tbody> <tr> <td data-bbox="1142 499 1355 687">Rain water collection</td> <td data-bbox="1355 499 1803 687">Large containers are to be placed at strategic locations to collect rain water The rainwater shall be recycled for washing heavy machinery</td> <td data-bbox="1803 499 1924 687">On-going</td> </tr> <tr> <td data-bbox="1142 687 1355 810">Leakage on plumbing system</td> <td data-bbox="1355 687 1803 810">Frequent inspection to detect leakage Fix any leakage</td> <td data-bbox="1803 687 1924 810">On-going</td> </tr> <tr> <td data-bbox="1142 810 1355 933">Water compartmentalization</td> <td data-bbox="1355 810 1803 933">To conserve level of soil moisture To minimize water stress during dry season</td> <td data-bbox="1803 810 1924 933">On-going</td> </tr> <tr> <td data-bbox="1142 933 1355 1015">Handling of chemicals</td> <td data-bbox="1355 933 1803 1015">To recycle water spillage while mixing of chemical at mixing area</td> <td data-bbox="1803 933 1924 1015">On-going</td> </tr> <tr> <td data-bbox="1142 1015 1355 1129">education</td> <td data-bbox="1355 1015 1803 1129">Avoid excessive usage during cleaning Close pipe to prevent water dripping</td> <td data-bbox="1803 1015 1924 1129">On-going</td> </tr> <tr> <td data-bbox="1142 1129 1355 1211">Re-streaming</td> <td data-bbox="1355 1129 1803 1211">Re stream from sterilizer condensate pit for dilution</td> <td data-bbox="1803 1129 1924 1211">On-going</td> </tr> </tbody> </table> <p data-bbox="1142 1262 1783 1294">The Mill Identification &amp; Management of Waste Water</p>	Issues/Areas	Action Steps	Status	Rain water collection	Large containers are to be placed at strategic locations to collect rain water The rainwater shall be recycled for washing heavy machinery	On-going	Leakage on plumbing system	Frequent inspection to detect leakage Fix any leakage	On-going	Water compartmentalization	To conserve level of soil moisture To minimize water stress during dry season	On-going	Handling of chemicals	To recycle water spillage while mixing of chemical at mixing area	On-going	education	Avoid excessive usage during cleaning Close pipe to prevent water dripping	On-going	Re-streaming	Re stream from sterilizer condensate pit for dilution	On-going	
Issues/Areas	Action Steps	Status																						
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		Location	Wastewater produced	Treatment/ containment	Reuse/recycle /disposal method	
		Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ ETP	Recover into system	
		Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain	
		Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain	
		Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain	
		Lab	Cleaning water	Process drain	Monsoon drain	
		Wash room	Toilet water, cleaning water	Septic tank	Collection by licensed contractor.	
7.8.2	<b>(C)</b> 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	The estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemical application and				Complied

	<p>environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>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 signboards were displayed accordingly at the site where applicable. The guideline was issued by the GSD Unit with latest revision dated on 13/06/2011. During the field visit there was no spraying activities or signs left in such an area. The buffer zones identified at the estates are as follows:</p> <table border="1" data-bbox="1146 715 1921 1018"> <thead> <tr> <th>Estate/Mill</th> <th>Buffer zone area</th> </tr> </thead> <tbody> <tr> <td>Sungai Samak Estate</td> <td>Sg Cawang / Sg Bernam /Sg Erong</td> </tr> <tr> <td>Bagan Datoh Estate</td> <td>Water steam P17A /P15A</td> </tr> <tr> <td>Flemington Estate</td> <td>Bund Bernam River</td> </tr> <tr> <td>Sabak Bernam Estate</td> <td>Sg Bernam River Reserve</td> </tr> <tr> <td>Flemington Mill</td> <td>Water Catchment</td> </tr> </tbody> </table> <table border="1" data-bbox="1146 1018 1921 1220"> <thead> <tr> <th></th> <th>parameter</th> <th>Standard</th> <th></th> <th>Parameter</th> <th>standard</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>6-9</td> <td>4</td> <td>SS</td> <td>50</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>3</td> <td>5</td> <td>AN</td> <td>0.3</td> </tr> <tr> <td>3</td> <td>COD</td> <td>25</td> <td>6</td> <td>DO</td> <td>5-7</td> </tr> </tbody> </table> <table border="1" data-bbox="1146 1220 1921 1364"> <thead> <tr> <th></th> <th>parameter</th> <th>Standard</th> <th></th> <th>Parameter</th> <th>standard</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Aldrin</td> <td>0.02 ppb</td> <td>5</td> <td>Heptachlor</td> <td>0.05 ppb</td> </tr> </tbody> </table>	Estate/Mill	Buffer zone area	Sungai Samak Estate	Sg Cawang / Sg Bernam /Sg Erong	Bagan Datoh Estate	Water steam P17A /P15A	Flemington Estate	Bund Bernam River	Sabak Bernam Estate	Sg Bernam River Reserve	Flemington Mill	Water Catchment		parameter	Standard		Parameter	standard	1	pH	6-9	4	SS	50	2	BOD	3	5	AN	0.3	3	COD	25	6	DO	5-7		parameter	Standard		Parameter	standard	1	Aldrin	0.02 ppb	5	Heptachlor	0.05 ppb	
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2	Dieldrin	0.02 ppb	6	lindane	2 ppb
3	t-DDT	0.1 ppb	7	Endosulfan	10 ppb
4	BHC	2 ppb	8	Chlordane	0.08 ppb

Samples are taken from the mill and estates for detection of any pollution arising from the mill and estates activities. Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. Among others parameters as shown above:

Among others management plan taken:

- a. Regular inspection at buffer/HCV areas
- b. Monitor water from surrounding areas
- c. Track, measure and report all activities around river
- d. Train and educate workers.

The sampling sites taken as follows. There were no issues on the water quality. Variation if any is investigated as per the SOP.

OU	Sampling sites	Date	Frequency
Sungai Samak Estate	P11A/14A/14A/02E/02C/01C	26/05/22	4x/year
Bagan Datoh Estate	14F/20A/14D/16A	06/04/22	4x/year

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		<table border="1"> <tr> <td>Flemington Estate</td> <td>Upstream WG1/WG3/Drain</td> <td>22/06/22</td> <td>4x/year</td> </tr> <tr> <td>Sabak Bernam Estate</td> <td>Water steam P17A /P15A</td> <td>05/07/22</td> <td>4x/year</td> </tr> <tr> <td>Flemington Mill</td> <td>Hulu/Hilir Sg Dulang</td> <td>15/06/22</td> <td>Monthly</td> </tr> </table>	Flemington Estate	Upstream WG1/WG3/Drain	22/06/22	4x/year	Sabak Bernam Estate	Water steam P17A /P15A	05/07/22	4x/year	Flemington Mill	Hulu/Hilir Sg Dulang	15/06/22	Monthly																													
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7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>Based on Jadual Pematuhan FPOM disposed effluent on water discharge final point exit to Sg Dulang via Flemington Estate field. Sighted quarterly report has been submitted to DOE (license no 004234 01/07/2022 - 30/06/2023) by quarterly basis. Latest submission for to DOE on 16/4/2022 for period Jan to Mac 2022. Among others the indicators were:</p> <table border="1"> <thead> <tr> <th>Jan – Mac 22</th> <th>STD</th> <th>06/1/22</th> <th>15/2/22</th> <th>10/3/22</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>5-9</td> <td>8.80</td> <td>9.10</td> <td>9.30</td> </tr> <tr> <td>BOD mg/l</td> <td>100</td> <td>64.00</td> <td>63.00</td> <td>32.00</td> </tr> <tr> <td>A Nitrogen</td> <td>150</td> <td>13.00</td> <td>1.00</td> <td>12.00</td> </tr> <tr> <td>Total N</td> <td>200</td> <td>38.00</td> <td>51.00</td> <td>36.00</td> </tr> <tr> <td>Oil &amp; Grease</td> <td>50</td> <td>2.00</td> <td>2.00</td> <td>11.00</td> </tr> <tr> <td>Total Solids</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>S Solids</td> <td>400</td> <td>110.00</td> <td>70.00</td> <td>130.00</td> </tr> </tbody> </table> <p>All parameters tested complied with regulatory standards except for marginal pH level.</p>	Jan – Mac 22	STD	06/1/22	15/2/22	10/3/22	pH	5-9	8.80	9.10	9.30	BOD mg/l	100	64.00	63.00	32.00	A Nitrogen	150	13.00	1.00	12.00	Total N	200	38.00	51.00	36.00	Oil & Grease	50	2.00	2.00	11.00	Total Solids	-	-	-	-	S Solids	400	110.00	70.00	130.00	Complied
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p>	<p>The mill processing water are obtained from the LAP and water catchment adjacent to the mill complex. The water usage</p>	Complied																																								

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	<p>- Minor compliance -</p>	<p>monitoring is made on a monthly basis. The usage in 2021 is as follows;</p> <table border="1" data-bbox="1146 434 1917 1129"> <thead> <tr> <th>Month</th> <th>Water/mt</th> <th>FFB /mt</th> <th>Water /FFB</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>10391</td><td>11404</td><td>0.91</td></tr> <tr><td>Feb</td><td>14707</td><td>15493</td><td>0.95</td></tr> <tr><td>Mac</td><td>17069</td><td>17553</td><td>0.97</td></tr> <tr><td>Apr</td><td>15460</td><td>17854</td><td>0.87</td></tr> <tr><td>May</td><td>15217</td><td>15608</td><td>0.97</td></tr> <tr><td>Jun</td><td>16553</td><td>15836</td><td>1.05</td></tr> <tr><td>July</td><td>17419</td><td>17237</td><td>1.01</td></tr> <tr><td>Aug</td><td>16767</td><td>15472</td><td>1.08</td></tr> <tr><td>Sep</td><td>17824</td><td>16235</td><td>1.10</td></tr> <tr><td>Oct</td><td>13176</td><td>11923</td><td>1.11</td></tr> <tr><td>Nov</td><td>14247</td><td>11699</td><td>1.22</td></tr> <tr><td>Dec</td><td>13710</td><td>12166</td><td>1.13</td></tr> <tr><td>Total</td><td>182539</td><td>178479</td><td>1.02</td></tr> </tbody> </table> <p>A slightly higher water usage noted, due to the proportionate reduction in volume of FFB being processed. There were variations of performance. Probable factors are linked to rainy days, significant boiler water rinsing/discharging for maintenance etc.</p>	Month	Water/mt	FFB /mt	Water /FFB	Jan	10391	11404	0.91	Feb	14707	15493	0.95	Mac	17069	17553	0.97	Apr	15460	17854	0.87	May	15217	15608	0.97	Jun	16553	15836	1.05	July	17419	17237	1.01	Aug	16767	15472	1.08	Sep	17824	16235	1.10	Oct	13176	11923	1.11	Nov	14247	11699	1.22	Dec	13710	12166	1.13	Total	182539	178479	1.02	
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<p>7.9.1</p>	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report 2022. The document was reviewed/updated on Jan 2022. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table border="1" data-bbox="1144 539 1930 1145"> <thead> <tr> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>Backhoe tractor</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To ensure the vehicle engine is turn off during idle time  To record vehicle activity which consume fuel</td> </tr> <tr> <td>Van / Supervisory vehicle</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To record vehicle activity in order to eliminate waste activity which consume fuel.  To turn off vehicle engine during idle time.</td> </tr> <tr> <td>Electrical supply</td> <td>To reduce reliance on gen-sets for power supply</td> <td>Utilization of TNB sources</td> </tr> </tbody> </table> <p>The utilization of fossil fuel in 2021 is being monitored with records shown below in Diesel L/FFB mt :</p> <table border="1" data-bbox="1144 1257 1930 1353"> <thead> <tr> <th>Mth</th> <th>SSE</th> <th>BDE</th> <th>SBE</th> <th>FE</th> <th>FPOM</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>1.39</td> <td>2.78</td> <td>5.06</td> <td>2.14</td> <td>0.09</td> </tr> </tbody> </table>	Target	Objective	Action plan	Backhoe tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time  To record vehicle activity which consume fuel	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To record vehicle activity in order to eliminate waste activity which consume fuel.  To turn off vehicle engine during idle time.	Electrical supply	To reduce reliance on gen-sets for power supply	Utilization of TNB sources	Mth	SSE	BDE	SBE	FE	FPOM	Jan	1.39	2.78	5.06	2.14	0.09	<p>Complied</p>
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Feb	1.12	2.27	2.50	1.27	0.06
Mac	1.15	1.87	2.08	1.01	0.08
Apr	0.95	1.65	2.18	1.07	0.08
May	1.57	1.77	2.52	1.39	0.08
Jun	1.70	2.07	2.31	1.64	0.10
July	0.84	2.70	2.50	2.06	0.08
Aug	0.81	2.56	2.89	1.80	0.08
Sep	0.76	2.81	3.06	3.46	0.08
Oct	1.19	2.87	2.69	2.15	0.09
Nov	1.19	2.67	2.92	3.86	0.09
Dec	1.89	2.92	4.81	2.72	0.11
<b>Total</b>	<b>75757</b>	<b>121922</b>	<b>114580</b>	<b>62069</b>	<b>2987</b>

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

Performance variation in view of several factors i.e.

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

There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy

		<p>production in replacement of fossil fuel with the current technology limitation.</p> <p><u>Flemington Mill and SOU 04 Estates</u></p> <p>A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2022 identified in the following</p> <ul style="list-style-type: none"> <li>a. Environmental Aspect Identification Summary FY 2022 reviewed accordingly.</li> <li>b. Environmental Impact Evaluation Summary FY 2022 reviewed accordingly.</li> </ul> <p>Renewable energy usage &amp; diesel consumption 2021 was established and monitored by monthly basis. Among others effort to reduce diesel usage includes the following;</p> <ul style="list-style-type: none"> <li>a. By maintenance of the boiler &amp; machinery to ensure at optimum level,</li> <li>b. to monitor diesel usage, provide training to workers regarding reduce fuel and diesel usage for boiler.</li> </ul>	
<p><b>Criterion 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
7.10.1	<p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 04 Mill and Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.</p> <ul style="list-style-type: none"> <li>a. The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment.</li> <li>b. Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.</li> </ul>	Complied

7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>SOU 04 has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. There is no new development within the SOU 04 estates.</p>	Complied						
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. (SM/5.2/EAI) and (SM/5.2/EIE) which covers estates and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1137 954 1930 1359"> <thead> <tr> <th data-bbox="1146 960 1352 1034">Environmental Receptors</th> <th data-bbox="1361 960 1921 1034">Source</th> </tr> </thead> <tbody> <tr> <td data-bbox="1146 1040 1352 1184">Air</td> <td data-bbox="1361 1040 1921 1184">Air emissions –from boiler stack (smoke &amp; particulate), vehicle &amp; generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).</td> </tr> <tr> <td data-bbox="1146 1190 1352 1353">Water</td> <td data-bbox="1361 1190 1921 1353">Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) &amp; boiler quenching water and blow down</td> </tr> </tbody> </table>	Environmental Receptors	Source	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down	Complied
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		<table border="1" data-bbox="1144 368 1933 480"> <tr> <td data-bbox="1144 368 1355 480">land</td> <td data-bbox="1355 368 1933 480">Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.</td> </tr> </table> <p data-bbox="1137 531 1926 751">Flemington Mill conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS was found to be in functional condition. Data from the stack is connected online to DOE’s office. Boiler smoke emission data are within the DOE limit.</p> <p data-bbox="1137 764 1926 858">An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent.</p> <p data-bbox="1137 871 1926 997">‘Pollution prevention plan and waste management action plan’ is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly. Among of action has been taken by CU were:</p> <ul style="list-style-type: none"> <li data-bbox="1137 1010 1926 1198">a. Scheduled wastes – were disposed through Kualiti Alam Pentas Flora Sdn Bhd, Sime Darby Industrial, Edgenta Mediserve Sdn Bhd (SW404). Domestic waste .are disposed at Majlis Perbandaran Teluk Intan landfill twice a week accumulated at designated area located far from housing complexes and waterways for all estates and mill.</li> <li data-bbox="1137 1211 1926 1241">b. Full compliance to zero burning practices.</li> </ul>	land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.	
land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.				
<p><b>Criterion 7.11:</b> Fire is not used for preparing land and is prevented in the managed area</p>					

7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.          - Critical (Major) compliance -</p>	<p>There was no land preparation of existence or new planting in SOU 04 and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> <li>a. EQMS-SOP-Section B2 - Under felling/clearing &amp; land preparation</li> <li>b. Carbon Policy</li> </ul> <p>As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied									
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.          - Minor compliance -</p>	<p>This is established in the ERP procedure <i>Kertas Kerja Program Simulasi Kebakaran</i> dated 12/9/2019. Therein containing</p> <ul style="list-style-type: none"> <li>a. Objective</li> <li>b. Activity and prevention.</li> <li>c. Function of Fire and Rescue Team</li> <li>d. Emergency Evacuation Plan / Drill</li> </ul> <p>The procedure was formalised by RSQM for use in all operating units in SDP Estates and mills. Training related to fire drill / prevention are conducted annually.</p> <table border="1" data-bbox="1151 1177 1917 1374"> <thead> <tr> <th>Estate / Mill</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Sungai Samak Estate</td> <td>10/09/21</td> <td>18/07/22</td> </tr> <tr> <td>Bagan Datoh Estate</td> <td>08/07/22</td> <td>09/08/22</td> </tr> </tbody> </table>	Estate / Mill	Date	Date	Sungai Samak Estate	10/09/21	18/07/22	Bagan Datoh Estate	08/07/22	09/08/22	Complied
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Sabak Bernam Estate	19/07/22	13/01/22										
Flemington Mill	17/03/22	09/12/20										
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Both the estates and the mill in SOU 04 held engagement with the adjacent stakeholders via briefing sessions as stated in ERP procedure <i>Kertas Kerja Program Simulasi Kebakaran</i> Lampiran A and Fire Prevention and Control Measure.</p> <ul style="list-style-type: none"> <li>a. Objective</li> <li>b. Activity and prevention.</li> <li>c. Function of Fire and Rescue Team</li> <li>d. Emergency Evacuation Plan / Drill</li> <li>e. Compliance to related legislative requirement</li> <li>f. Compliance to Human Rights Charter</li> </ul> <p>All stakeholders being briefed in the respective stakeholder’s meetings. This is inclusive on the fire prevention and control measures akin to the earlier session in meetings. Session in 2021 were made via form feedback distribution due to MCO restriction.</p> <table border="1"> <thead> <tr> <th>Operating Units</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Sungai Samak Estate</td> <td>28/06/22</td> <td>12/07/21</td> </tr> <tr> <td>Bagan Datoh Estate</td> <td>21/06/22</td> <td>14/06/21</td> </tr> </tbody> </table>	Operating Units	Date	Date	Sungai Samak Estate	28/06/22	12/07/21	Bagan Datoh Estate	21/06/22	14/06/21	Complied
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		Flemington Estate	09/05/22	06/10/21	
		Sabak Bernam Estate	09/08/22	12/06/21	
		Flemington Mill	27/05/22	15/06/21	
<b>Criterion 7.12:</b> Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.					
7.12.1	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new planting (refer 7.7.1 to 7.7.3). Hence, the requirement under this indicator does not apply.</p>			Complied
7.12.2	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b>          Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p>	<p>The HCV re-assessment was compiled by PSQM team on Sept 2016 for Estates of SOU 04. Thereafter being reviewed on July 2020. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <p>a. Overview of HCV assessment</p> <p>b. Description of assessment area</p> <ul style="list-style-type: none"> <li>- Landscape context</li> <li>- biodiversity &amp; conservation values</li> <li>- ecosystem service / social &amp; cultural values</li> </ul> <p>c. HCV criteria &amp; application to agriculture</p> <ul style="list-style-type: none"> <li>- Visual observation &amp; supporting information</li> <li>- Wildlife in plantation</li> <li>- decision on HCV status</li> </ul>			Complied

<p>- Critical (Major) compliance -</p>	<p>d. HCV management / Monitoring.</p> <p>The report is given in details to provide the existence of HCV, complete with photo and description The conservation and management of such identified areas are also detailed therein. The HCV areas presence as identified by the estates within SOU 04 are given below;</p> <table border="1" data-bbox="1137 624 1926 987"> <thead> <tr> <th>Area</th> <th>Site</th> <th>Ha</th> <th>HCV Type</th> </tr> </thead> <tbody> <tr> <td>Bund Bernam River</td> <td>FE</td> <td>0.20</td> <td>4</td> </tr> <tr> <td>Mill Water Catchment</td> <td>FE</td> <td>7.18</td> <td>4</td> </tr> <tr> <td>Bund Perak River</td> <td>BDE</td> <td>2.00</td> <td>4</td> </tr> <tr> <td>Bernam River Reserve</td> <td>SBE</td> <td>1.24</td> <td>4</td> </tr> <tr> <td>Sg Erong/Chawang Reserve</td> <td>SSE</td> <td>7.32</td> <td>4</td> </tr> <tr> <td>Pond</td> <td>SSE</td> <td>0.49</td> <td>4</td> </tr> <tr> <td>Total</td> <td></td> <td>17.94</td> <td></td> </tr> </tbody> </table> <p>All areas were sighted and verified. Hectare for the re-categorized areas has not affected the others category including the planted areas. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented. The HCVs, conservation areas/environmentally sensitive areas e.g. bund along the stretches of river/straits which passes bordering through the estate had been identified and being monitored.</p> <p>The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU 04 estates. Hence the current HCV assessment of the estates remains valid.</p>	Area	Site	Ha	HCV Type	Bund Bernam River	FE	0.20	4	Mill Water Catchment	FE	7.18	4	Bund Perak River	BDE	2.00	4	Bernam River Reserve	SBE	1.24	4	Sg Erong/Chawang Reserve	SSE	7.32	4	Pond	SSE	0.49	4	Total		17.94			
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7.12.3	<i>Indicator is not applicable in Malaysia context</i>		Not Applicable																				
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>The HCV re-assessment was compiled by PSQM team on Sept 2016 for Estates of SOU 04. Thereafter being reviewed on July 2020. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <ol style="list-style-type: none"> <li>a. Overview of HCV assessment</li> <li>b. Description of assessment area             <ul style="list-style-type: none"> <li>- Landscape context</li> <li>- biodiversity &amp; conservation values</li> <li>- ecosystem service / social &amp; cultural values</li> </ul> </li> <li>c. HCV criteria &amp; application to agriculture             <ul style="list-style-type: none"> <li>- Visual observation &amp; supporting information</li> <li>- Wildlife in plantation</li> <li>- decision on HCV status</li> </ul> </li> <li>d. HCV management / Monitoring.</li> </ol> <p>The report is given in details to provide the existence of HCV, complete with photo and description The conservation and management of such identified areas are also detailed therein. The HCV areas presence as identified by the estates within SOU 04 are given below;</p> <table border="1" data-bbox="1146 1150 1921 1358"> <thead> <tr> <th>Area</th> <th>Site</th> <th>Ha</th> <th>HCV Type</th> </tr> </thead> <tbody> <tr> <td>Bund Bernam River</td> <td>FE</td> <td>0.20</td> <td>4</td> </tr> <tr> <td>Mill Water Catchment</td> <td>FE</td> <td>7.18</td> <td>4</td> </tr> <tr> <td>Bund Perak River</td> <td>BDE</td> <td>2.00</td> <td>4</td> </tr> <tr> <td>Bernam River Reserve</td> <td>SBE</td> <td>1.24</td> <td>4</td> </tr> </tbody> </table>	Area	Site	Ha	HCV Type	Bund Bernam River	FE	0.20	4	Mill Water Catchment	FE	7.18	4	Bund Perak River	BDE	2.00	4	Bernam River Reserve	SBE	1.24	4	Complied
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Pond	SSE	0.49	4
Total		17.94	

All areas were sighted and verified. Hectare for the re-categorized areas has not affected the others category including the planted areas. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented. The HCVs, conservation areas/environmentally sensitive areas e.g. bund along the stretches of river/straits which passes bordering through the estate had been identified and being monitored.

All stakeholders being briefed in the respective stakeholders meetings. This is inclusive on the RSPO/MSPO SDP compliance and efforts akin to the earlier session in meetings. Session in 2021 were made via form feedback distribution due to MCO restriction.

Operating Units	Date	Date
S Samak Estate	28/06/22	12/07/21
B Datoh Estate	21/06/22	14/06/21
Flemington Estate	19/05/22	17/06/21
S Bernam Estate	09/08/22	12/06/21
Flemington Mill	27/05/22	15/06/21

<p>7.12.5</p>	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>The audit findings have confirmed that there is no rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018 in SOU 04 estates. Hence, the requirement under this indicator does not apply.</p>	<p>Complied</p>
<p>7.12.6</p>	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The HCV re-assessment was compiled by PSQM team on Sept 2016 for Estates of SOU 04. Thereafter being reviewed on July 2020. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <ol style="list-style-type: none"> <li>a. Overview of HCV assessment</li> <li>b. Description of assessment area             <ul style="list-style-type: none"> <li>- Landscape context</li> <li>- biodiversity &amp; conservation values</li> <li>- ecosystem service / social &amp; cultural values</li> </ul> </li> <li>c. HCV criteria &amp; application to agriculture             <ul style="list-style-type: none"> <li>- Visual observation &amp; supporting information</li> <li>- Wildlife in plantation</li> <li>- decision on HCV status</li> </ul> </li> <li>d. HCV management / Monitoring.</li> </ol> <p>All the HCVs were maintained by the management of estates and mill. This exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented.</p> <p>No RTE species identified in the estates visited as per Addendum to High conservation value, Final Report for Strategic Operating Unit 4, ver. 2.0 dated July 2020. The monitoring was done monthly by respective estates.</p>	<p>Complied</p>

<p>7.12.7</p>	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The CU management has established a standard monitoring document. Details provided include the following information;</p> <ol style="list-style-type: none"> <li>Area</li> <li>Field no and GPS coordinate</li> <li>Observation             <ul style="list-style-type: none"> <li>- Encroachment /sign of trespassing</li> <li>- Wildlife issues/conflicts/sighting</li> <li>- Pollution /erosion issues</li> </ul> </li> <li>Maintenance of signage / fence</li> </ol> <p>The monitoring being made by the AP during the security rounds in the estate complex. The field staff/Assistant also played a role in providing information during their daily rounds in the fields. Records furnished by the APs were sighted and verified.</p> <table border="1" data-bbox="1144 847 1919 1331"> <thead> <tr> <th>Action steps</th> <th>Action Plan</th> <th>Date</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>Inspection of HCV</td> <td>Continuous inspection and recommendation To liase with related agency</td> <td>On-going</td> <td>Estate mgmt</td> </tr> <tr> <td>Protection or conservation &amp; monitoring of biodiversity area.</td> <td>To continuously collaborate with R&amp; D to monitor the status &amp; health of trees</td> <td>On-going</td> <td>Estate mgmt</td> </tr> <tr> <td>Protection &amp; conservation of mangrove forests area.</td> <td>To erect signs indicating mangrove forest near coastal areas. To erect signs indicating mangrove forest as HCV areas for conservation.</td> <td>On-going</td> <td>Estate mgmt</td> </tr> </tbody> </table>	Action steps	Action Plan	Date	PIC	Inspection of HCV	Continuous inspection and recommendation To liase with related agency	On-going	Estate mgmt	Protection or conservation & monitoring of biodiversity area.	To continuously collaborate with R& D to monitor the status & health of trees	On-going	Estate mgmt	Protection & conservation of mangrove forests area.	To erect signs indicating mangrove forest near coastal areas. To erect signs indicating mangrove forest as HCV areas for conservation.	On-going	Estate mgmt	<p>Complied</p>
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		Rehabilitation & habitat enhancement	To participate in tree planting divers tree species to enhance the surrounding biodiversity.	On-going	Estate mgmt	
		Interface with animals	Raise awareness of HCV/RTE to employees Employees are taught not to disturbed/hunt wildlife. Liaison with <i>Jabatan Perhilitan</i> on wildlife encounter/discovery	On-going	Estate mgmt	
		Education and awareness	Educate employees on importance of biodiversity. Encourage research on specific biodiversity To erect signage No fishing/no hunting/no swimming	On-going	Estate mgmt	
7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.          - Critical (Major) compliance -</p>	<p>No RTE species identified in the estate visited as per Addendum to High conservation value, Final Report for Strategic Operating Unit 4, ver. 2.0 dated July 2020. The monitoring was done monthly by sampling estate.</p> <p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 04 estates. Hence, the requirement under this indicator does not apply.</p>				Complied



**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2021** for **SOU 4 Flemington POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. 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 **SOU 4 Flemington POM** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.71
PKO	1.71

Extraction	%
OER	20.71
KER	4.48

Production	t/yr
FFB Process	178,460.70
CPO Produced	36,967.41
PKO Produced	7,997.8

Land Use	Ha
OP Planted Area	31,417.35
OP Planted on peat	258.40
Conservation (forested)	0.00
Conservation (non-forested)	0.00
<b>Total</b>	<b>31,675.75</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	87336.29	0.53	5583.69	0.56	0.00	0.00	92919.98	
CO <sub>2</sub> Emission from fertilizer	12562.09	0.08	689.00	0.07	0.00	0.00	13251.09	
NO <sub>2</sub> Emission	1760.67+ 6530.44	0.05	416.42	0.04	0.00	0.00	1760.67+ 6946.86	
Fuel Consumption	1028.86	0.01	30.01	0.00	0.00	0.00	1058.87	
Peat Oxidation	12842.09	0.08	0.00	0.00	0.00	0.00	12842.09	
<b>Sink</b>								
Crop Sequestration	-82783.20	-0.50	-5270.65	-0.25	0.00	0.00	-88053.86	
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Total</b>	<b>39277.24</b>	<b>0.24</b>	<b>1448.46</b>	<b>0.14</b>	0.00	0.00	<b>41409.51</b>	

\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	34981.32	0.20
Fuel Consumption	46.03	0.00
Grid Electricity Utilization	484.29	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>35511.64</b>	<b>0.20</b>

**Summary of Kernel Crusher Emission and Credit (if applicable)**

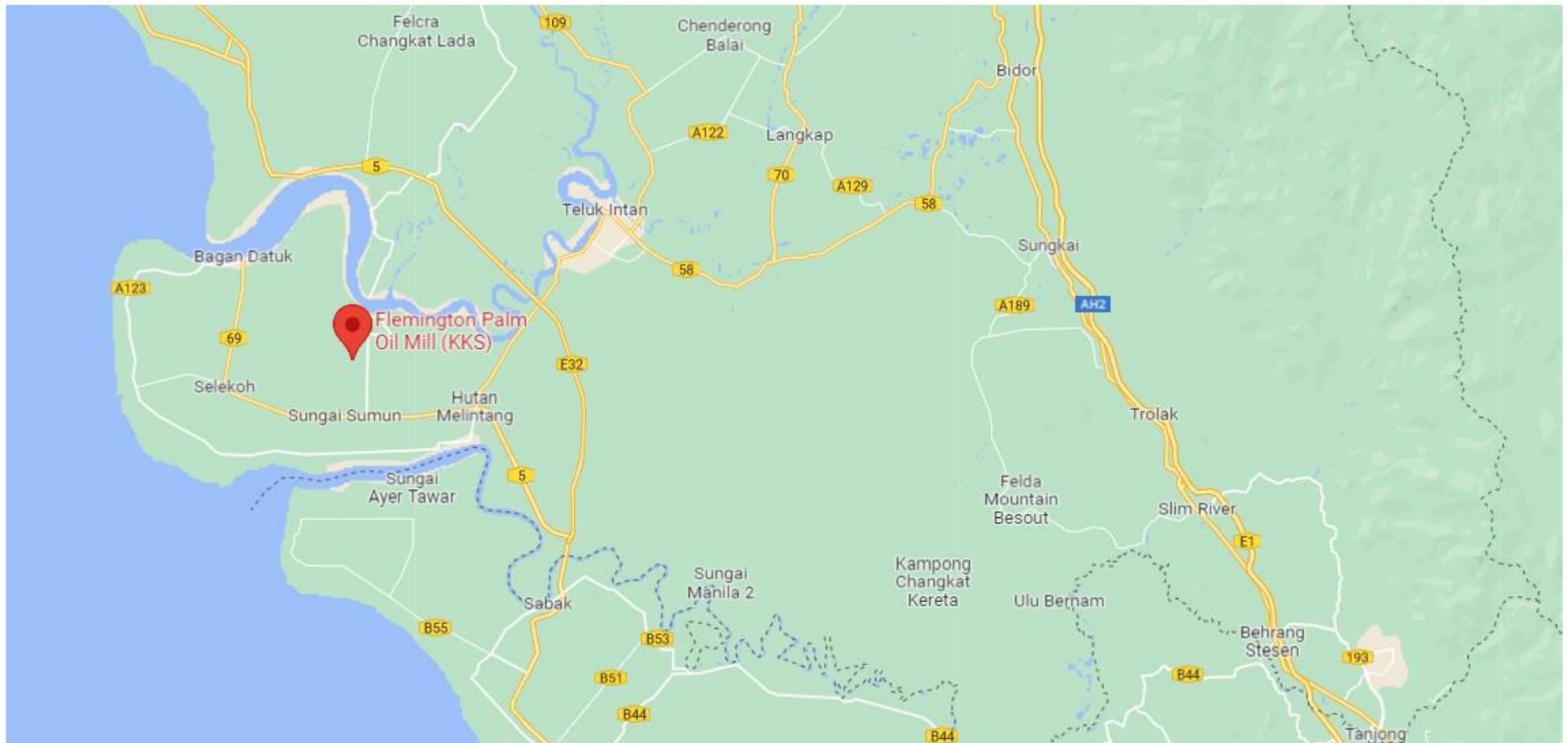
Emissions	tCO <sub>2</sub> e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

\*This mill has no kernel crusher operation.

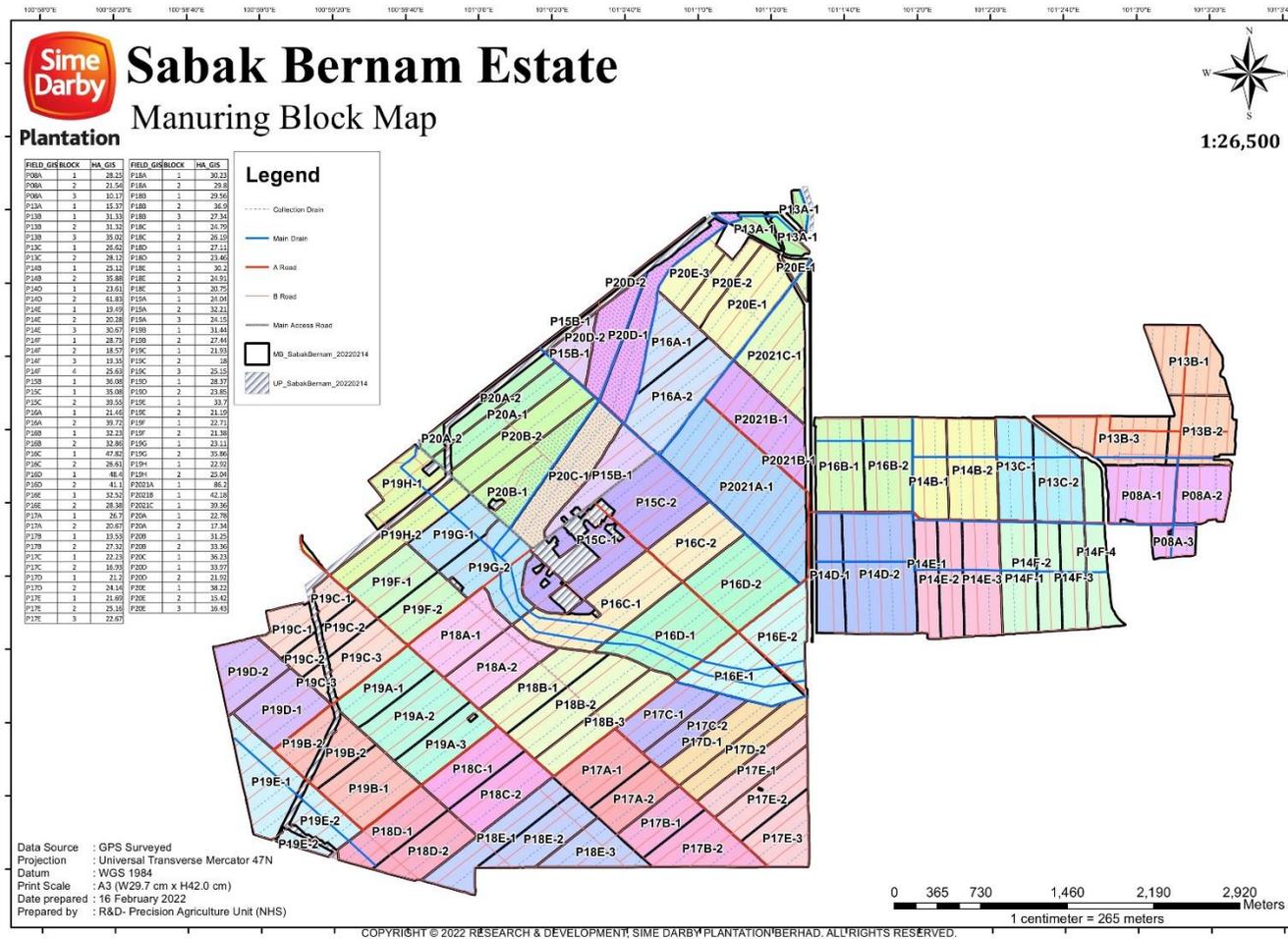
<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

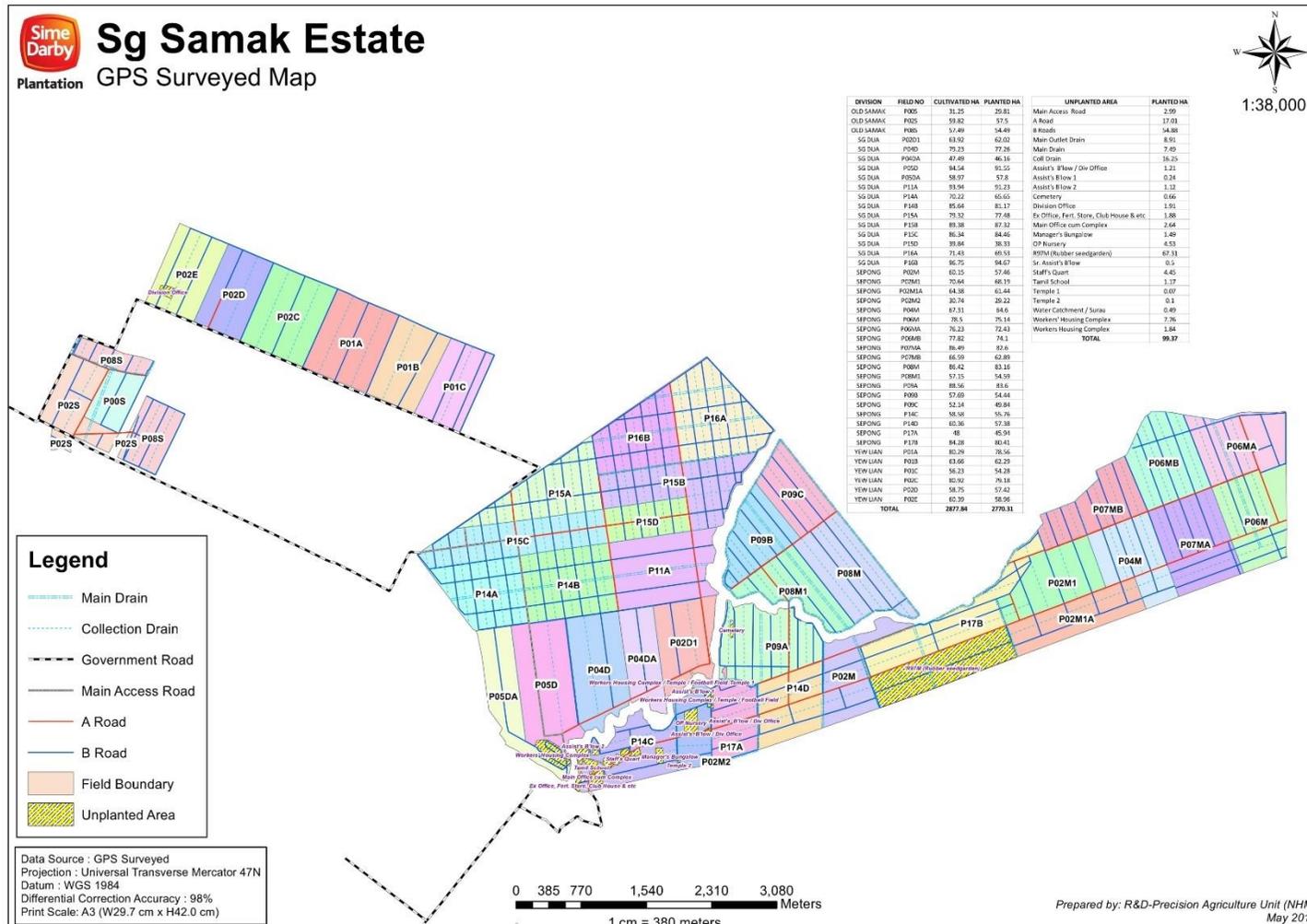
**Appendix C: Location Map of Certification Unit and Supply bases**

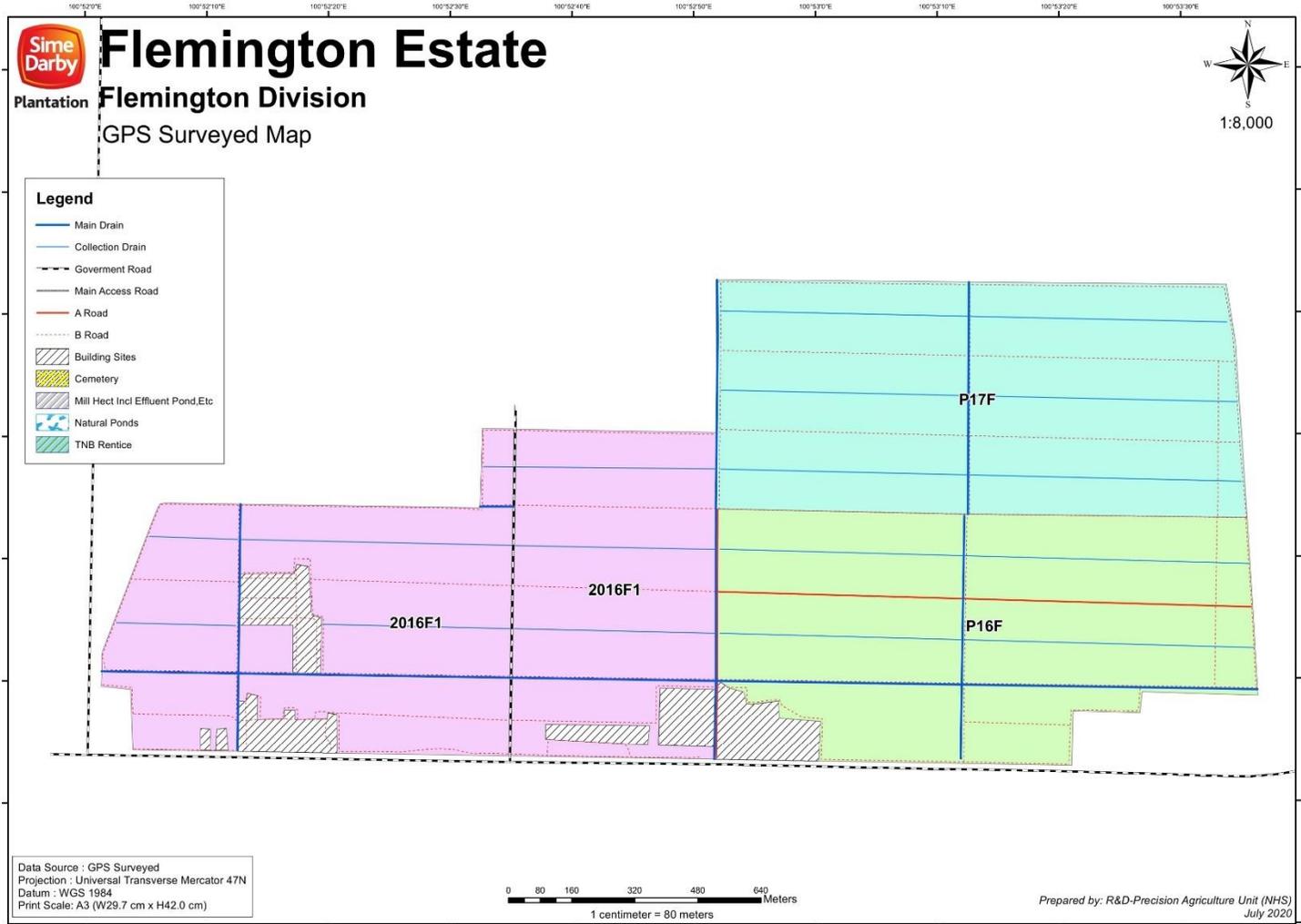


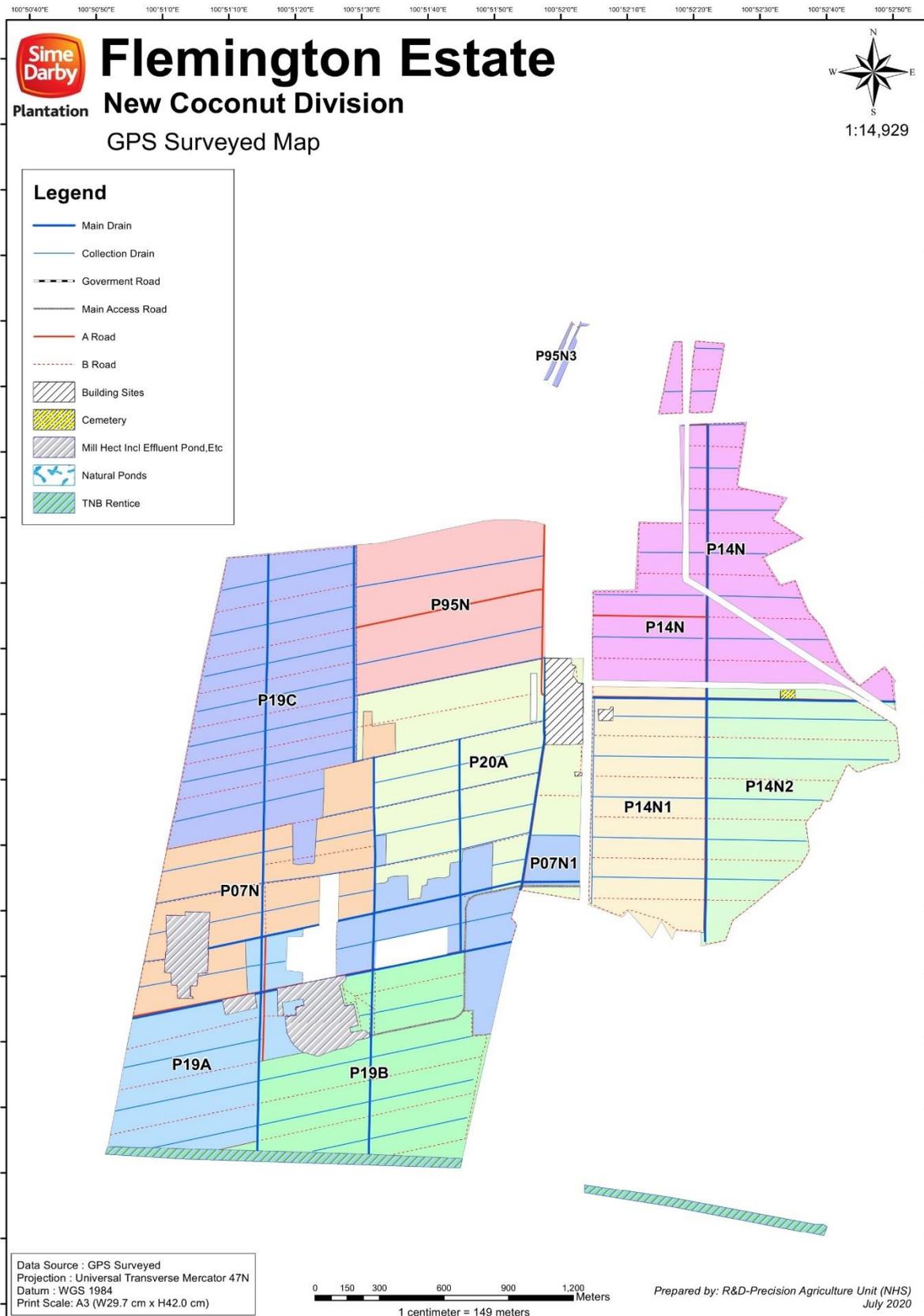
**Appendix D: Estate Field Map**

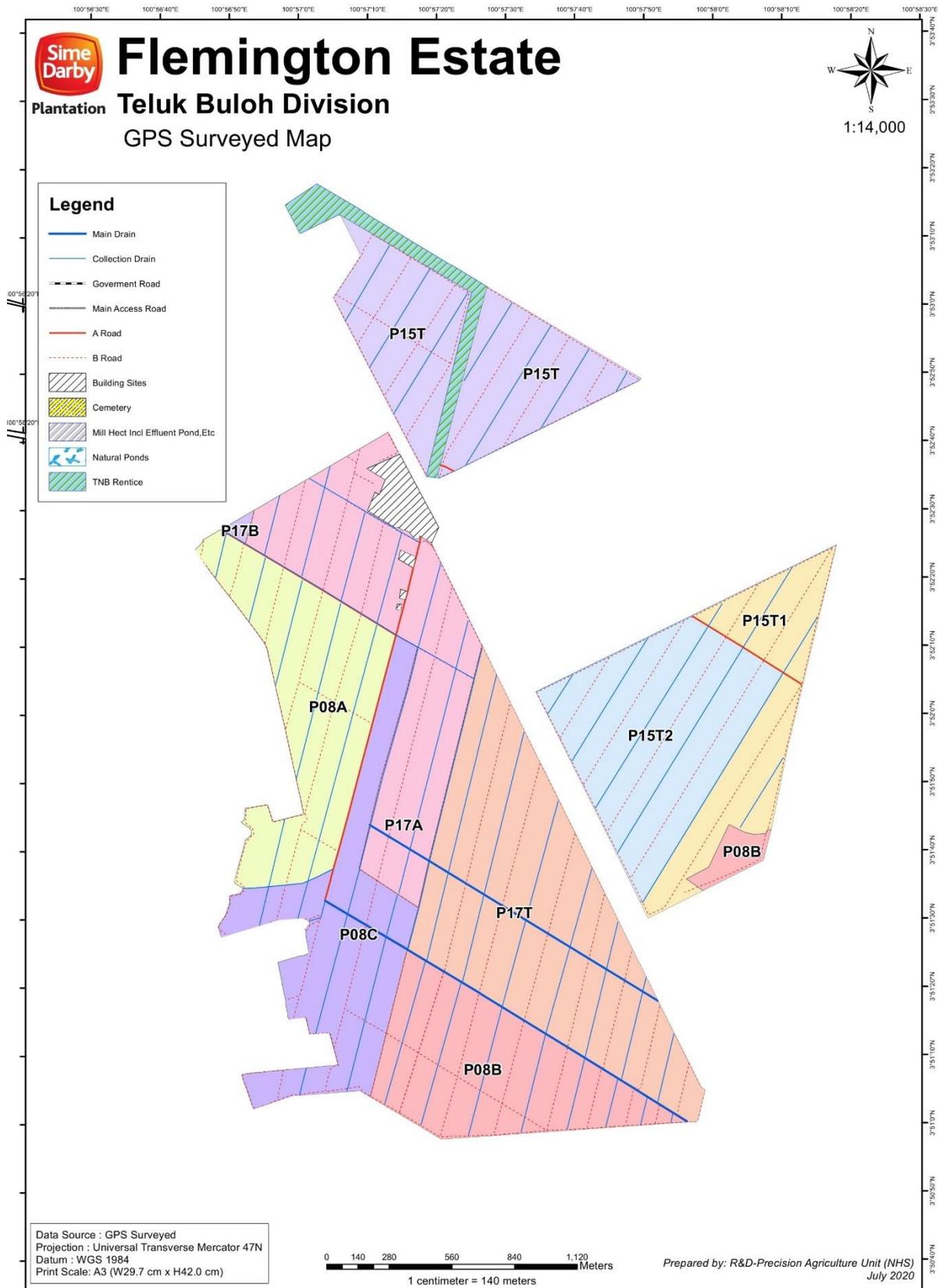


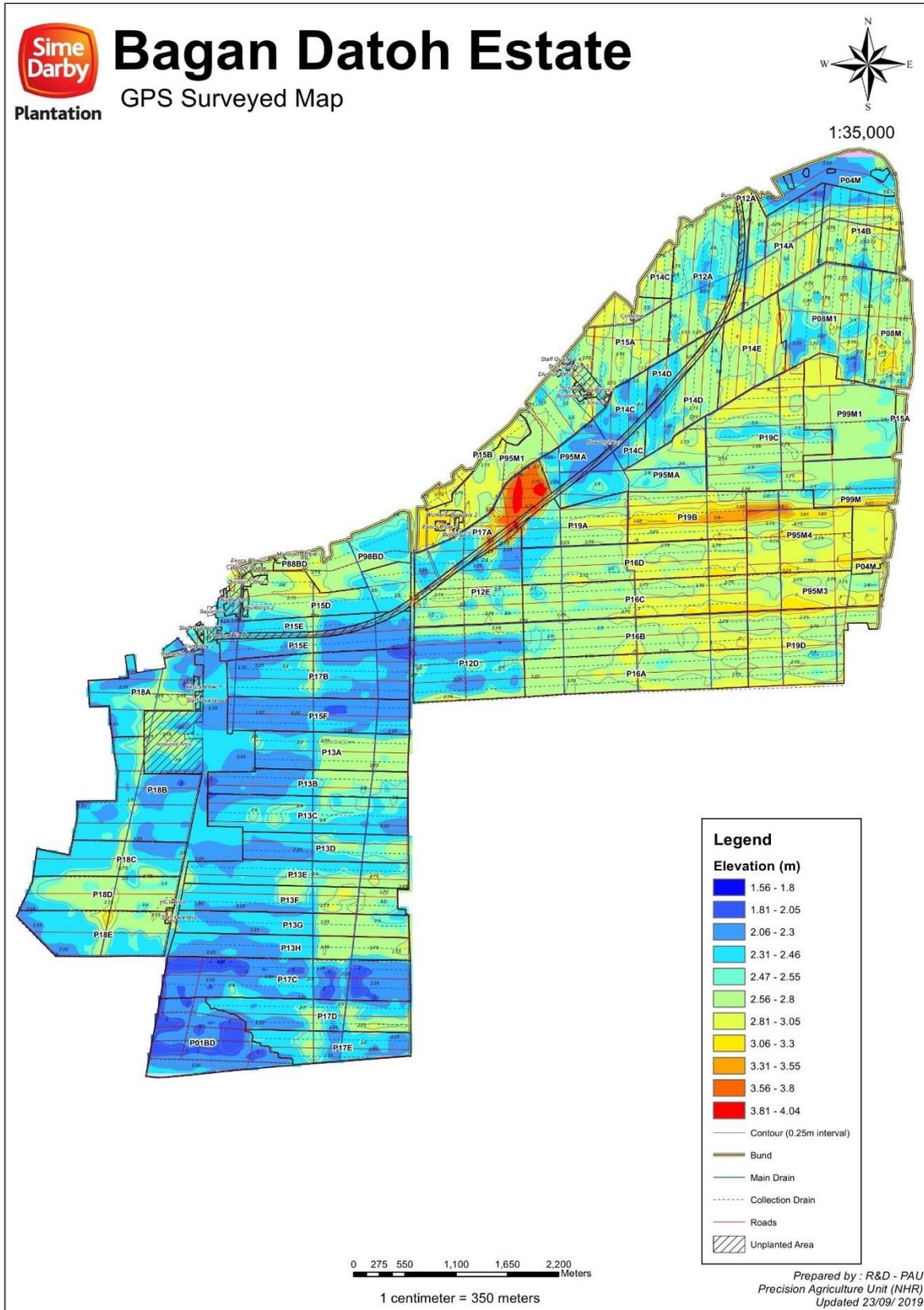
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**Appendix E: List of Smallholder Registered and/or sampled**

Not Applicable

## Appendix F: List of Abbreviations

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