

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (1_3)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company name (Parent Company): TDM Plantation Sdn Bhd
Client company Address: Aras 1-5 , Bangunan UMNO Terengganu, Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu, Malaysia.
Certification Unit: Kemaman Palm Oil Mill
Location of Certification Unit: Kemaman Palm Oil Mill, KM 121, Jerangau – Jabor Highway, 24101 Kemaman Terengganu, Malaysia
Date of Final Report: 31/01/2022

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	TDM Plantation Sdn Bhd		
RSPO Membership Number	1-0095-11-000-00	Membership Approval Date	28/11/2011
Address	Aras 1-5 , Bangunan UMNO Terengganu . Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu, Malaysia.		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Kemaman Palm Oil Mill		
Location / Address	Kemaman Palm Oil Mill KM 121, Jerangau – Jabor Highway, 24101 Kemaman Terengganu, Malaysia		
Website	www.tdmberhad.com.my		
Management Representative	Tuan Haji Hassan Bin Osman	E-mail	Kemaman.POM.tdmp@tdmberhad.com.my
Telephone	09 822 6566	Facsimile	09 822 6704

2. Certification Information			
Certificate Number	RSPO 587626	Certificate Start Date	01/11/2018
Date of First Certification	01/11/2013	Certificate Expiry Date	31/10/2023
Scope of Certification	Palm Oil and Palm Kernel Production		
Visit Objectives	<p>Determination of the conformity of the client's management system, or parts of it with audit criteria.</p> <p>Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</p>		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	60 MT/Hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 678572	MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills	BSI Services Malaysia Sdn Bhd	27/09/2023
MSPO 686877	MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn Bhd	27/09/2023

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Kemaman Palm Oil Mill	KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4° 24' 10.80" N	103° 14' 52.80" E
Tebak Estate	KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4° 25' 48.61" N	103° 13' 35.40" E
Pelantoh Estate	KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4° 24' 19.23" N	103° 14' 59.64" E
Jernih Estate	KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4° 26' 24.00" N	103° 12' 39.59" E
Air Putih Estate	KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4° 8' 23.99" N	103° 7' 47.99" E
Gajah Mati Estate	Lot 140-141, Mukim Bukit Besi, 23200 Dungun Terengganu, Malaysia	4° 41' 45.05" N	103° 12' 23.30" E
MAIDAM Estate	AM9, Bandar Ambs, 23400 Dungun Terengganu, Malaysia	4° 37' 39.58" N	103° 12' 24.42" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Tebak Estate	2,922.33	30.46	340.84	3,293.63	88.73
Pelantoh Estate	3,153.27	0.25	138.08	3,291.60	95.80

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Jernih Estate	2,822.07	65.46	248.07	3,135.60	90.00
Air Putih Estate	4,042.70	187.70	121.58	4,351.98	94.00
Gajah Mati Estate	3,520.87	153.13	208.78	3,882.78	90.68
MAIDAM Estate	755.96	6.74	151.38	914.08	83.32
Total	17,217.20	443.74	1,208.73	18,869.67	91.24

Note:

6. Plantings & Cycle

Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Tebak Estate	564.39	87.39	227.29	1,684.45	358.81	2,357.94	564.39
Pelantoh Estate	1,335.84	0.00	0.00	0.00	1,817.43	1,817.43	1,335.84
Jernih Estate	688.15	82.20	1,517.17	534.55	0.00	2,133.92	688.15
Air Putih Estate	0.00	2,517.73	0.00	1,524.97	0.00	4,042.70	0.00
Gajah Mati Estate	1,087.91	1,524.31	207.12	701.53	0.00	2,432.96	1,087.91
MAIDAM Estate	379.70	0.00	0.00	376.26	0.00	376.26	379.70
Total (ha)	4,055.99	4,211.63	1,951.58	4,821.76	2,176.24	13,161.21	4,055.99

Note:

7. Summary of Certified Tonnage of FFB (Own Certified Scope)

Estate / Smallholders	Tonnage / year			
	Estimated last year (Nov 2020-Oct 2021)	Actual* (Sep 2020 – Aug 2021)		Forecast (Nov 2021 -Oct 2022)
		Previous license period (Sep 2020 – Oct 2020)	Current license period (Nov 2020 – Aug 2021)	
Tebak Estate	68,246.00	5,429.31	16,848.42	35,300.00
Pelantoh Estate	24,151.00	4,388.16	15,725.32	13,610.00
Jernih Estate	84,351.00	7,865.33	22,887.17	40,700.00
Air Putih Estate	59,751.00	9,256.45	30,400.62	66,748.00
Gajah Mati Estate	23,421.00	5,650.45	21,776.72	38,500.00
MAIDAM Estate	5,731.00	381.87	998.73	2,180.00
Total	265,651.00	141,608.55		197,038.00

Note: *Less production due to less harvesting area due to most of the estates have replanting program and young mature area.

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8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Nov 2020-Oct 2021)	Actual (Sep 2020 – Aug 2021)		Forecast (Nov 2021 -Oct 2022)
		Previous license period (Sep 2020 – Oct 2020)	Current license period (Nov 2020 – Aug 2021)	
		0.00	7,800.59	
Pinang Emas Estate		0.00	2,701.99	
Jerangau Estate		0.00	918.73	
Taylor Estate		0.00	1,368.85	
Bari/Jaya Estate		0.00	1,276.77	
Fikri Estate		0.00	336.59	
Tabung Tentera Estate		0.00		
Total		14,403.52		

Note:

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (Nov 2020-Oct 2021)	Actual (Sep 2020 – Aug 2021)		Forecast (Nov 2021 -Oct 2022)
		Previous license period (Sep 2020 – Oct 2020)	Current license period (Nov 2020 – Aug 2021)	
		NA	NA	NA
NA	NA	NA	NA	NA
Total				

Note:

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Sep 2020	13,103.48	-	13,103.48
2	Oct 2020	19,868.08	-	19,868.08
3	Nov 2020	18,859.01	-	18,859.01
4	Dec 2020	16,996.94	-	16,996.94
5	Jan 2021	11,430.40	-	11,430.40

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6	Feb 2021	11,734.42	-	11,734.42
7	Mar 2021	11,420.43	-	11,420.43
8	Apr 2021	10,422.25	-	10,422.25
9	May 2021	11,575.89	-	11,575.89
10	Jun 2021	15,684.43	-	15,684.43
11	Jul 2021	2,097.20	-	2,097.20
12	Aug 2021	12,819.54	-	12,819.54
TOTAL		156,012.07	-	156,017.07

Note:

10. Summary of Certified Tonnage (not applicable for ISS)

Estimated last year (Nov 2020-Oct 2021)	Actual * (Sep 2020 – Aug 2021)		Forecast (Nov 2021 -Oct 2022)
FFB	FFB 156,012.07		FFB
265,651.00	<i>Previous license period (Sep 2020 – Oct 2020)</i>	<i>Current license period (Nov 2020 – Aug 2021)</i>	197,038.00
	32,971.56	123,040.51	
CPO (OER: 20.20 %)	CPO (OER: 18.27 %)		CPO (OER: 20.32 %)
53,661.50	7,403.08	21,096.11	40,038.12
PK (KER: 4.75 %)	PK (KER: 4.46 %)		PK (KER: 4.78 %)
12,309.48	1,447.41	5,504.91	9,418.42

Note:

10A. Monthly Records of Certified CPO & PK since the last audit

No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Sep 2021	4,382.80	990.66
2	Oct 2020	3020.28	456.75
3	Nov 2020	2723.67	936.45
4	Dec 2020	991.69	726.8
5	Jan 2021	4134.21	596.82
6	Feb 2021	2003.15	419.42
7	Mar 2021	2343.52	613.76
8	Apr 2021	2229.79	583.55
9	May 2021	1649.88	460.7

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10	Jun 2021	2685.5	597.46
11	Jul 2021	2292.99	484.66
12	Aug 2021	41.71	85.29
TOTAL		28,499.19	6,952.32
Note:			

11. Summary of Actual Volume sold					
Current License period (Nov 2020 – Aug 2021)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	19,545.86	0	0	1,507.16	21,053.02
PK (MT)	5,419.62	0	0	0	5,419.62
Credits	0	0	0	0	0.00
Previous License period (Sep 2020 – Oct 2020)					
CPO (MT)	4,780.85	0	0	2463.37	7,244.22
PK (MT)	1,122.66	0	0	0	1,122.66
Credits	0	0	0	0	0.00
Note: Conventional is RSPO certified material but sold as non-RSPO.					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1.	Buyer ABC	509449006000	1599.9	
		500456206000	445.61	
2.			0.00	484.66
3.		500422806000	500.00	0.00
		500428706000	980.17	0.00
		500456206000	405.43	0.00
		500447306000	300.00	0.00
		509449006000	499.90	0.00
4.			0.00	597.46
5.		500428706000	849.45	0.00
	509449006000	502.35	0.00	
	500447306000	298.08	0.00	
6.		0.00	460.70	

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7.		500428706000	895.19	0.00
		509449006000	501.86	0.00
		500447306000	300.00	0.00
		500422806000	499.85	0.00
8.			0.00	583.55
9.		509449006000	500.95	0.00
		500428706000	439.59	0.00
		553255107000	44.27	0.00
		500447306000	300.00	0.00
		508357806000	516.94	0.00
10.			0.00	613.76
11.		500428706000	74.05	0.00
		509449006000	501.53	0.00
		500447306000	300.00	0.00
12.			0.00	419.42
13.		500447306000	300.00	0.00
		500428706000	994.77	0.00
		508357806000	905.62	0.00
		500456206000	531.68	0.00
		553255107000	608.89	0.00
14.			0.00	596.82
15.		500456206000	253.57	0.00
		508357806000	504.90	0.00
16.			0.00	726.80
17.		500428706000	500.00	0.00
		500456206000	334.84	0.00
		508357806000	376.00	0.00
		500432506000	494.43	0.00
18.			0.00	936.45
19.		500428706000	301.39	0.00
		508357806000	1143.2	0.00
		500432506000	499.90	0.00
		509449006000	499.84	0.00
20.		500428706000	4,780.85	1,122.66
21.		500428706000	41.71	0.00
TOTAL			24326.71	6542.28
Note:				

11B. Records of CPO & PK Sold under other schemes since the last audit (if any)

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No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
	NA	NA	NA	NA
TOTAL				
Note:				

11C. Records of CPO & PK Sold as conventional since the last audit (if any)				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1.	Buyer ABC	3970.53	0.00	
TOTAL		3970.53	0.00	
Note:				

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

12. Independent Smallholders Certified Tonnage / Volume									
Phase	Estimated last year (<i>key in period</i>)			Actual (<i>key in period</i>)			Forecast (<i>key in period</i>)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB									
IS-CSPO									
IS-CSPKO									
IS-CSPKE									

13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period (<i>key in period</i>)						
Credits						

Physical							
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Section 2: Assessment Process

Certification Body:

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

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **20 – 22/10/2021**. 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 **11/01/2022**. 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.

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Kemaman Palm Oil Mill	√	√	√	√	√
Pelantoh Estate	√	-	-	√	-
Masjid Agama Islam Estate	-	-	√	-	-
Gajah Mati Estate	-	√	-	-	√
Air Putih Estate	-	-	√	-	-
Tebak Estate	√	-	-	√	-
Jernih Estate	-	√	-	-	√

Tentative Date of Next Visit: October 3, 2022 - October 5, 2022

Total Number of Mandays: 9 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Muhammad Fadzli Masran (MFM)	Team Leader	<p>Education: He holds Bachelor Degree in Forestry Science, graduated from University Putra Malaysia</p> <p>Work Experience: He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations.</p> <p>Training attended:</p>

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		<p>He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018, endorsed RSPO Lead Auditor Course in July 2018, MSPO Lead Auditor Course in October 2018, endorsed RSPO Supply Chain Certification training course in January 2019, MSPO Supply Chain Certification System (SCCS) Auditor training Course (MPOCC Endorsed), CQI and IRCA Certified ISO 9001:2015 Lead Auditor Training Course in April 2019, HCV and GIS Training in November 2019 and SMETA Requirements Training in April 2021.</p> <p>Aspect covered in this audit:</p> <p>During this assessment, he assessed on the aspects of Occupation Health Safety requirement, HIRARC, training, management plan, good agriculture practice, GHG and and RSPO supply chain requirements.</p> <p>Language proficiency:</p> <p>Fluent in in both verbal/written Bahasa Malaysia and English Language.</p>
<p>Hafriazhar Mohd Mokhtar (HMM)</p>	<p>Team Member</p>	<p>Education:</p> <p>Bachelor of Engineering (Hons.) Chemical Engineering, UTM</p> <p>Work Experience:</p> <p>Near 20 years of working experience in multiple engineering disciplines emphasized on science, technology and sustainability. He acquired many skills from being involved in various industrial environments ranging from construction, plantation and mining before shifted into auditing. In short, his career began as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in plantation, Project Control Engineer (2008-2011) in mining and Auditor/Client Manager (2011- present) in certifications auditing.</p> <p>Training attended:</p> <p>Social Auditing & SMETA Training (2021), ISO 45001 LA Training (2018), MSPO LA Training (2017), RSPO SCCS LA Training (2016), RSPO P&C LA Training (2015), ISO 9001 LA Training (2013), ISO 50001 LA Training (2012), ISO 14001 LA Training (2011)</p> <p>Aspect covered in this audit:</p> <p>During this assessment, he assessed on the aspects of Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, and Stakeholder Consultation.</p> <p>Language proficiency:</p> <p>Fluent in in both verbal/written Bahasa Malaysia and English Language.</p>
<p>Amir Bahari (AB)</p>	<p>Team Member</p>	<p>Education:</p> <p>He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996.</p> <p>Work Experience:</p> <p>He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates.</p> <p>Training attended:</p> <p>He successfully completed the ISO 14001 Lead Auditor Course and Endorsed RSPO P&C Lead Auditor Course. He also attended HCV Awareness for RSPO/ MSPO auditors on December 2016 and RSPO HCV Audit Guidelines on April 2021.</p> <p>Aspect covered in this audit:</p>

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		<p>During the assessment he covered mills and estates best practices, Legal Requirements, land & Legal issue environmental and HCV.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English Language.</p>
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Accompanying Persons:

Name	Role
Nor Halis Abu Zar	Observer

1.3 Assessment Plan

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

Date	Time	Subjects	(MFM)	(HMM)	(AB)
Tuesday, 19/10/2021	PM	Audit Team Travelling	√	√	√
Wednesday, 20/10/2021	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan 	√	√	√
Pelantoh Estate	09.00 – 12.30	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.	√	√	√
	09.30 – 12.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)			√
	12.30 – 13.30	Lunch	√	√	√
	13.30 – 16.30	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.)	√	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√

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Date	Time	Subjects	(MFM)	(HMM)	(AB)
Thursday 21/10/2021 Kemaman Palm Oil Mill	08.30 – 12.30	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, etc.	√	√	√
	09.00 – 13.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)			√
	12.30 – 13.30	Lunch	√	√	√
	13.30 - 16.30	Lab, weighbridge and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√
Friday, 22/10/2021 Tebak Estate	08.30 – 12.30	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.	√	√	√
	09.30 – 12.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)			√
	12.30 – 14.00	Lunch	√	√	√
	14.00 – 16.30	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.)	√	√	√
	16.30 - 17.00	Preparation of audit report	√	√	√
	17.00 – 17.30	Closing Meeting	√	√	√

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Major NC Close Out

Date	Time	Subjects	MFM
Monday 10/01/2022	AM	Auditor Travelling	√
Tuesday 11/01/2022	08.30 – 09.00	Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan	√
08.30 – 11.30 Kemaman POM	09.00 – 11.00	<ul style="list-style-type: none"> • Verification on previous Major NC: <ol style="list-style-type: none"> 1. 2121147-202110-M1 • Site observation ,workers interview (individual and group session) if necessary • Document review – implemented evidence 	√
	11.00 – 11.30	Closing Meeting	√
	11.30 – 13.30	Audit travel	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. Please refer to Approved Time Bound Plan for details on the mills and estates of TDM Plantations Sdn. Bhd. Group.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	Except for the newly acquired Bukit Bidong Estate, all estates and mills in Malaysia has been certified within five years. Certification for sites in Indonesia has been put on hold pending divest of properties there.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	Yes there's newly acquired estate from Tabung Haji Plantations. The newly acquired Bukit Bidong Estate has been planned to be audited and certified by 2023.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	As of now there are no deviations on the period required for approval by the RSPO Secretariat.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	No, there are no changes to the time bound plan since the last audit. ACOP Reporting has been verified and found to be consistent.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No, there has not been any isolated lapses in the implementation of the plan.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No, there is no fundamental failure in implementation of the plan.	Complied
Un-Certified Units or Holdings		

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No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	No replacement after dates defined in this Criterion 7.12 involving primary forest. Newly acquired Bukit Bidong Estate is in progress of arrangement for assessment to determine any requirement to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new plantings since 1st January 2010 that requires compliance with the RSPO New Plantings Procedure.	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	Based on RSPO RACP tracker, there are 0 cases of Management Units with potential liability, LUCA and Concept Note requirements.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No labour dispute reported in the uncertified units.	Complied
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance reported in the uncertified units.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes. As part of the RSPO P&C compliance, internal audit has been conducted at the uncertified units. Report of improvement was provided for site's further improvement.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No. There were no any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estate.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes. Stakeholders including NGO were consulted in the uncertified units and documented.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a	There are no Scheme Smallholders or Scheme Outgrowers within the Mill's Certification Unit.	Complied

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major NC if this requirement is not met after three years.		
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Approved Time Bound Plan

Details of Time Bound Plan as submitted by TDM Plantation Sdn. Bhd. (26th October 2021)

No.	Name of the Estate and Mills		TBP for certification	Status as at 26/10/2021	Any unresolved (Labour Disputes / Land conflicts / Legal Non-Compliance etc)
1	TDM Plantation Sdn. Bhd. Tebak Estate, Kemaman, Terengganu, Malaysia	Supply base for TDM Plantation Sdn. Bhd. Kemaman Palm Oil Mill, Kemaman, Terengganu, Malaysia.	November 2013	Certified	None
2	TDM Plantation Sdn. Bhd. Pelantoh Estate, Kemaman, Terengganu, Malaysia		November 2013	Certified	None
3	TDM Plantation Sdn. Bhd. Jernih Estate, Kemaman, Terengganu, Malaysia		November 2013	Certified	None
4	TDM Plantation Sdn. Bhd. Air Putih Estate, Kemaman, Terengganu, Malaysia		November 2013	Certified	None

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5	TDM Plantation Sdn. Bhd. Gajah Mati Estate, Dungun, Terengganu, Malaysia	November 2013	Certified	None
6	TDM Plantation Sdn. Bhd. MAIDAM Estate, Dungun, Terengganu, Malaysia	November 2013	Certified	None

1	TDM Plantation Sdn. Bhd. Tayor Estate, Setiu, Terengganu, Malaysia	Supply base for TDM Plantation Sdn. Bhd. Sungai Tong Palm Oil Mill, Setiu, Terengganu, Malaysia.	December 2013	Certified	None
2	TDM Plantation Sdn. Bhd. Pelong Estate, Setiu, Terengganu, Malaysia		December 2013	Certified	None
3	TDM Plantation Sdn. Bhd. Jaya Estate, Setiu, Terengganu, Malaysia		December 2013	Certified	None
4	TDM Plantation Sdn. Bhd. Fikri Estate,		December 2013	Certified	None

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	Setiu, Terengganu, Malaysia				
5	TDM Plantation Sdn. Bhd. Pinang Emas Estate, Dungun, Terengganu, Malaysia		December 2013	Certified	None
6	TDM Plantation Sdn. Bhd. Jerangau Estate, Ajlil, Terengganu, Malaysia		December 2013	Certified	None
7	TDM Plantation Sdn. Bhd. Bukit Bidong Estate, Permaisuri, Terengganu, Malaysia	To be determined	Latest by December 2023	In progress	None

3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A.

During this Assessment there were one (1) Critical; two (2) Minor nonconformities and no Opportunity For Improvement raised. The TDM Kemaman Palm Oil Mill and Supply Base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2121147-202110-M1	Date Issued	22/10/2021
Due Date	19/01/2022	Date of nonconformity Closure	11/01/2022
Clause & Category (Critical / Minor)	6.7.3 – Critical Non-Conformity		
Statement of Nonconformity:	The enforcement to ensure the usage of PPE is not effectively implemented		
Requirement Reference:	(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
Objective Evidence:	Noted during site visit at the mill loading ramp, sighted the lorry drivers from estate (Air Putih Estate and Pelantoh Estate) was not wearing safety helmet or appropriate safety equipment when opening the FFB loading BIN and when climbing the lorry to open safety net.		
Corrections:	Estate and mill management have called all estate drivers for safety briefing and PPE wearing & awareness training at workplace on the 3rd of November 2021. Estate has also issued a memo to all drivers as a reminder of the importance of wearing the PPE at workplace.		
Root Cause Analysis:	Personal Protective Equipment (PPE) such as safety helmet and shoes for all lorry and tractor drivers has been provided adequately every year or when necessary, along with wearing training at work place. However, awareness on proper use of PPE among workers and drivers still unsatisfactory due to training has not sufficient conducted following the COVID 19 pandemic involving residents, estate and mill workers recently and cause drivers negligence.		
Corrective Actions:	PPE will be provided adequately and PPE wearing training will be conducted annually to all estate drivers.		

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Assessment Conclusion:	<p>Monitoring on use of PPE to all drivers and other workers will be conducted by estate and mill management involving estate/mill security personnel.</p> <p>The operating units has issue internal memorandum to all FFB Transportation drivers (lorries and tractors) on instruction of compulsory to wear PPE when transporting FFB to the mill. Reviewed the internal memo as follows:</p> <ol style="list-style-type: none"> 1. Kemaman POM: Internal Memo no. P/MEMO/RSPO/001/2021 dated 25/10/2021 2. Pelantoh Estate: Internal Memo no. LPT/RSPO/010 dated 25/10/2021 3. Air Putih Estate: Internal Memo no. LAP.MEMO/RSPO/001 dated 01/11/2021 <p>The memorandum was displayed at the security post at the respective operating units. Noted during interview with the security guards, the understanding on the SOP's and memorandum was satisfactory. During the FFB transportation into the mill, the security guards will check the PPE for drivers before permitted to enter the mill premise.</p> <p>The operating units has conducted training to all personnel related to the FFB transportation on PPE awareness such as lorry driver, workshop operator and security guards. Reviewed the training records such as training attendance and training material as follows:</p> <ol style="list-style-type: none"> 1. Kemaman POM: FFB driver entry and exit procedure and PPE awareness and in the mill area dated 10/11/2021. 2. Pelantoh Estate: Safety training - PPE awareness for FFB transportation to the mill dated 03/11/2021. 3. Air Putih Estate: Safety training to lorry drivers dated 27/12/2021. <p>The operating units has conducted training evaluation after all training conducted. The operating units monitored the PPE issued to the workers. Reviewed the PPE for issued as follows:</p> <p>Pelantoh Estate</p> <ol style="list-style-type: none"> 1. PT 00059 2. PT00240 3. PT1200713 4. PT00148 5. PT1701265 <p>Air Putih Estate</p> <ol style="list-style-type: none"> 1. AP0900493 2. AP00110 3. AP0900454 4. AP2001455 5. AP00104 <p>All the corrective action and evidence of implementation were found to be adequate. The Major NC closed on 11/01/2022.</p>
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Non-conformity			
NCR Ref #	2121147-202110-N1	Date Issued	22/10/2021
Due Date	Next Assessment	Date of nonconformity Closure	Next Assessment
Clause & Category (Critical / Minor)	6.7.2 – Minor Non-Conformity		
Statement of Nonconformity:	The monitoring of First Aid Box item is not effectively implemented		
Requirement Reference:	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.		
Objective Evidence:	Noted during site visit at the operating units, the item in the first aid box were inadequate as per listed in the First Aid Item List as follows: <ol style="list-style-type: none"> 1. Kemaman POM at FFB Ramp: Cotton and medicated oil 2. Pelantoh Estate at Harvesting Operation: Drop eye wash 		
Corrections:	Estate and mill management has called all first aid holders for training: The explanation on how to immediately inform the estate HA/management if the item in the box has been used and how to record it in the form given.		
Root Cause Analysis:	Inspections of first aid boxes are carried out by the estate HA on a monthly basis. For October 2021, inspection was conducted on 17/10/2021 (Pelantoh estate) and 16/10/2021 (mill compound), all items in the box were inspected and added for less or missing items. However, before auditing time, the items have been used by the workers and did not inform estate HA/ mill for the less of the item.		
Corrective Actions:	SOP for first aid kit will be reviewed and revised to implement the communication flow between HA /Management and first aider. Also to include the regular checking to make sure all item in first aid kit are available. Inspection of the first aid will be conducted as usual by monthly basis including record of the type of item use, recipient's name, date and signature. To perform the refreshment training for first aider and related person.		
Assessment Conclusion:	The CAP submitted found adequate to address the non-conformity. The effectiveness of CAP implementation will be assessed during next assessment.		
Non-conformity			
NCR Ref #	2121147-202110-N2	Date Issued	22/10/2021
Due Date	Next Assessment	Date of nonconformity Closure	Next Assessment
Clause & Category (Critical / Minor)	3.4.2 – Minor Non-Conformity		

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Statement of Nonconformity:	The social management and monitoring plans developed was insufficiently included the participation of affected stakeholders.
Requirement Reference:	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.
Objective Evidence:	Kemaman POM, Pelantoh Estate & Tebak Estate: The Social Management Action Plan developed in all operating units that involved an online external stakeholder survey as well as internal stakeholders found insufficient to include potential and actual issues occurred related to foreign workers late work permit renewals and abscondment which potentially due to Covid-19 pandemic.
Corrections:	Estate management have revised Social Management Action Plan in SEIA to resolve all issues related to late work permit renewal of foreign workers during MCO.
Root Cause Analysis:	During the movement Control Order (MCO) period the Estate operation especially harvesting process went on as usual as obtaining permission from the MITI. Therefore during that period foreign workers whose permits have expired are also given permission to work while awaiting the extension process.
Corrective Actions:	Social Management Action Plan are to be updated and reviewed every time to curb the problem of late renewals of work permit.
Assessment Conclusion:	The CAP submitted found adequate to address the non-conformity. The effectiveness of CAP implementation will be assessed during next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	NA

Positive Findings	
PF #	Description
PF 1	Good positive relationship maintained and highlighted by internal and external stakeholders
PF 2	Good cooperation by Management and Sustainability team and handling the audit.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1949922-202009-N1	Date Issued	04/09/2020
Due Date	22/10/2021	Date of nonconformity Closure	22/10/2021

Clause & Category (Critical / Minor)	2.2.2 – Minor Non-Conformity
Statement of Nonconformity:	- No specific clause on meeting applicable legal requirements stated in the sampled agreement - No evidence of legal due diligence of recruitment agencies (licensed/accredited) for migrant workers recruitment been conducted
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.
Objective Evidence:	KEMAMAN POM: Noted during document review of FFB Purchase Contract Agreement between TDM Plantation Sdn. Bhd. and Boustead Estates Agency Sdn. Bhd. dated 24/2/2020, there was no specific clause on meeting applicable legal requirements stated in the agreement. Estate: Documented information of legal due diligence been conducted for migrant workers recruitment agencies (licensed/accredited) not available in estates visited
Corrections:	KEMAMAN POM: -For immediate action, the agreement include the clause on applicable legal requirement. Estates: -All incoming foreign workers intake to be given agreement to agree for legal due diligence for both parties. Contents of the agreement will have;- - Wages -Age of employee -Facilities -Rules of working hours and other related items.
Root Cause Analysis:	KEMAMAN POM: The agreement already include the clause on meeting applicable legal requirement. However, for FFB purchase contract agreement for Boustead Estates Agency S/B was missed out due to short time period (emergency case) which the mill (Boustead) have a problem in processing the FFB. Estate : The contract agreement between migrant workers recruitment agencies and TDM Plantation Sdn. Bhd. has been kept in HQ.
Corrective Actions:	KEMAMAN POM: To register the new source of certified in system to avoid being miss out

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	<p>Estates: A copy of the agreement has been kept in estate for reference purposes</p>
Assessment Conclusion:	<p>The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.</p> <p>The management has revised the agreement has included an extension in clause 10.0 (lain-lain perkara) among others to include the following requirement for compliance;</p> <ul style="list-style-type: none"> a) Compliance to Malaysian laws and requirement b) Compliance to requirement in RSPO & MSPO c) To allow interested parties for inspect and check compliance from time to time d) Compliance to nonchild labour , forced labour ref Konvensyen Umur Minimum ILO 1973 (No 138) <p>In addition , all incoming foreign workers intake to be given agreement to agree for legal due diligence for both parties. Contents of the agreement will contain the following among others</p> <ul style="list-style-type: none"> a) Wages b) Age of employee c) Facilities d) Rules of working hours and other related items. <p>Hence the CAR received is accepted and concluded.</p>

Non-conformity			
NCR Ref #	1949922-202009-N2	Date Issued	04/09/2020
Due Date	22/10/2021	Date of nonconformity Closure	22/10/2021
Clause & Category (Critical / Minor)	2.2.3 – Minor Non-Conformity		
Statement of Nonconformity:	No specific clause on contain clauses disallowing child, forced and trafficked labour.		
Requirement Reference:	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.		
Objective Evidence:	<p>KEMAMAN POM:</p> <p>Noted during document review of FFB Purchase Contract Agreement between TDM Plantation Sdn. Bhd. and Boustead Estates Agency Sdn. Bhd. dated 24/2/2020, there was no specific clause containing clauses disallowing child, forced and trafficked labour stated in the agreement.</p>		
Corrections:	To include clause on contain disallowing child, forced and trafficked labour in all contract agreement.		

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Root Cause Analysis:	The agreement already include the clause on meeting applicable legal requirement. However, there was no specific clause containing clauses disallowing child, forced and trafficked labour stated in the agreement for FFB purchase contract agreement for Boustead Estates Agency S/B due to additional clause based on the RSPO P&C MYNI 2019.
Corrective Actions:	-All contract will be updated and monitored accordingly. -All contractor or third party will be briefed and explained regarding this matter.
Assessment Conclusion:	<p>The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.</p> <p>The FFB Purchase Contract Agreement between TDM Plantation Sdn. Bhd. and Boustead Estates Agency Sdn. Bhd. dated 22/2/2021, has been reviewed to include specific clause i.e</p> <ul style="list-style-type: none"> a) disallowing child labour b) Disallowing forced and trafficked labour <p>All contractors or third party had been briefed on 22/2/2021 and explained regarding this matter via sessions of the following:</p> <p>The management has revised the agreement has included an extension in clause 10.0 (lain-lain perkara) among others to include the following requirement for compliance;</p> <ul style="list-style-type: none"> a)compliance to Malaysian laws and requirement b)Compliance to requirement in RSPO & MSPO c)To allow interested parties for inspect and check compliance from time to time d)Compliance to nonchild labour , forced labour ref Konvensyen Umur Minimum ILO 1973 (No 138) <p>Hence the CAR received is accepted and concluded.</p>

Non-conformity			
NCR Ref #	1949922-202009-N3	Date Issued	04/09/2020
Due Date	22/10/2021	Date of nonconformity Closure	22/10/2021
Clause & Category (Critical / Minor)	3.1.3 – Minor Non-Conformity		
Statement of Nonconformity:	HCV declaration differences was not discussed in the Management review		
Requirement Reference:	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake		
Objective Evidence:	The HCV Assessment made by SRA Consultancy in Nov 2011 identified Ladang Air Putih having HCV 3 of 10 ha.		

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	<p>The estates declared the following HCV in addition to the report.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;">#</th> <th style="width: 60%;">HCV/Estate</th> <th style="width: 15%;">Air Putih</th> <th style="width: 20%;">Maidam</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>HCV 4 Water catchment P96B</td> <td style="text-align: center;">/</td> <td></td> </tr> <tr> <td>2</td> <td>HCV 4 Pond P96B</td> <td style="text-align: center;">/</td> <td></td> </tr> <tr> <td>3</td> <td>HCV 3 Hutan Tabung F</td> <td style="text-align: center;">/</td> <td></td> </tr> <tr> <td>4</td> <td>HCV 6 Mosque</td> <td style="text-align: center;">/</td> <td></td> </tr> <tr> <td>5</td> <td>HCV 1 Sg Angka P18</td> <td></td> <td style="text-align: center;">/</td> </tr> <tr> <td>6</td> <td>HCV 2 Sg Buluh Nipis</td> <td></td> <td style="text-align: center;">/</td> </tr> </tbody> </table>	#	HCV/Estate	Air Putih	Maidam	1	HCV 4 Water catchment P96B	/		2	HCV 4 Pond P96B	/		3	HCV 3 Hutan Tabung F	/		4	HCV 6 Mosque	/		5	HCV 1 Sg Angka P18		/	6	HCV 2 Sg Buluh Nipis		/
#	HCV/Estate	Air Putih	Maidam																										
1	HCV 4 Water catchment P96B	/																											
2	HCV 4 Pond P96B	/																											
3	HCV 3 Hutan Tabung F	/																											
4	HCV 6 Mosque	/																											
5	HCV 1 Sg Angka P18		/																										
6	HCV 2 Sg Buluh Nipis		/																										
Corrections:	To include in the management review meeting on changes occurred																												
Root Cause Analysis:	There was reassessment of HCV that was not captured in the declaration of the areas concerned.																												
Corrective Actions:	<p>To re-classify the areas concerned as following:</p> <p>MAIDAM Estate: The previous HCV areas in MAIDAM Estate (6.74 ha) will be re-classified as Conservation Value (CV) areas. The decision will be finalised during next coming SZ Sustainability Committee Meeting</p> <p>Air Putih: To stick as per SRA Consultancy HCV Assessment on Nov 2011 that identified 10 Ha of HCV 3 and that visited areas we considered as Conservation Value</p> <p>Areas that previously visited needs to be reviewed by management whether it is possible for development or cultivation and that issue will be raised up during upcoming management meeting in October 2020.</p>																												
Assessment Conclusion:	<p>The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.</p> <p>The management has discussed subject relating to HCV as one of the agenda during the Management Review (Marketing Operations Meeting) dated 12/10/2020. The minutes of meeting were sighted and verified. The following was also recorded:</p> <p>a)MAIDAM Estate - The previous HCV areas in MAIDAM Estate (6.74 ha) will be re-classified as Conservation Value (CV) areas. The decision will be finalised during next coming SZ Sustainability Committee Meeting</p> <p>b)Air Putih - to stick as per SRA Consultancy HCV Assessment on Nov 2011 that identified 10 Ha of HCV 3 and that visited areas considered as Conservation Value Hence the CAR received is accepted and concluded.</p>																												

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Non-conformity			
NCR Ref #	1949922-202009-N4	Date Issued	04/09/2020
Due Date	22/10/2021	Date of nonconformity Closure	22/10/2021
Clause & Category (Critical / Minor)	7.3.1 – Minor Non-Conformity		
Statement of Nonconformity:	The source of waste was not fully identified and documented		
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
Objective Evidence:	The Waste Management Action Plan 2020 for the Mill and the Estates have not identified sewage as part of the waste produced.		
Corrections:	To include source of waste (sewage) as one of the waste component has been included in Waste Management Plan 2020 (reviewed on 09/09/2020)		
Root Cause Analysis:	The sewage was previously included as part of water management by the mill and estate.		
Corrective Actions:	To correctly identify the source of waste during assessment to differentiate with source of water		
Assessment Conclusion:	<p>The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.</p> <p>The waste management plan 2021 has been revised to include source of waste (sewage) as one of the waste component on 09/09/2020. All document for the mill and the 2 estates were sighted and verified.</p> <p>Hence the CAR received is accepted and concluded.</p>		

Non-conformity			
NCR Ref #	1949922-202009-N5	Date Issued	04/09/2020
Due Date	22/10/2021	Date of nonconformity Closure	22/10/2021
Clause & Category (Critical / Minor)	4.2.3 – Minor Non-Conformity		
Statement of Nonconformity:	No evidence that a grievance parties been informed of progress of their grief issues		
Requirement Reference:	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.		

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Objective Evidence:	Based on the on-site stakeholder consultation with contractors and suppliers/vendors, most of them complaining on late payment issues where some payment delayed for almost one year. Trailing of related records of complain/grievance shown no records of such complain however verification with consulted contractors and suppliers/vendors confirmed that they were not been informed on the actual progress by relevant operating units.
Corrections:	This issue has been highlighted in monthly Operation/ Management Meeting. Estate and mill management will be notified on the grief issues (payment progress) to the related contractors, vendors and suppliers.
Root Cause Analysis:	There is no clear mechanism/ timeline regarding the grief issues (payment progress) to suppliers, vendors or contractors as it is arranged by HQ
Corrective Actions:	To establish a clear mechanism/timeline regarding grief issues (payment progress)
Assessment Conclusion:	Noted during on-site interview with the contractors and suppliers/vendors, there is no payment issues from the operating units. Payment made within 30 days upon receipt of supplier's. Payment was made through the financial department at head office. Sampled payment sighted as per sample payment for contractors and suppliers on 27/8/2020 as following: <ul style="list-style-type: none"> - Westari Corporation Sdn. Bhd.; Invoice date: Jan 2021; Payment voucher # PV0772 - Ainmanna Enterprise; Invoice date: Apr 2021; Payment voucher # PV2297 Hence the CAR received is accepted and concluded.

Opportunity for Improvement	
OFI#	Description
OFI 1	OFI Statement: NA Verification / Follow-up actions: NA

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1664201-201807 M1	Major	6.5.1	26/07/2018	Closed out on 18/10/2018
1664201-201807 M2	Major	4.4.2	26/07/2018	Closed out on 18/10/2018
1664201-201807 M3	Major	5.3.2	26/07/2018	Closed out on 18/10/2018
1664201-201807 M4	Major	SCCS 5.3.2	26/07/2018	Closed out on 18/10/2018
1664201-201807 M5	Major	SCCS 5.13.1	26/07/2018	Closed out on 18/10/2018
1664201-201807 M6	Major	SCCS 5.13.2	26/07/2018	Closed out on 18/10/2018
1664201-201807 M7	Major	SCCS 5.13.3	26/07/2018	Closed out on 18/10/2018
1820535-201903 M1	Major	4.6.11	06/09/2019	Closed out on 03/12/2019
1820535-201903 M2	Major	4.7.2	06/09/2019	Closed out on 03/12/2019

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1820535-201903 M3	Major	2.1.1	06/09/2019	Closed out on 03/12/2019
1820535-201903 M4	Major	5.5.1	06/09/2019	Closed out on 03/12/2019
1820535-201903 M5	Major	SCCS D 5.1	06/09/2019	Closed out on 03/12/2019
1820535-201903 M6	Major	SCCS D 4.2	06/09/2019	Closed out on 03/12/2019
1820535-201903 N1	Minor	5.6.3	06/09/2019	Closed out on 02/09/2020
1820535-201903 N2	Minor	5.2.4	06/09/2019	Closed out on 02/09/2020
1949922-202009-N1	Minor	2.2.2	04/09/2020	Closed out on 22/10/2021
1949922-202009-N2	Minor	2.2.3	04/09/2020	Closed out on 22/10/2021
1949922-202009-N3	Minor	3.1.3	04/09/2020	Closed out on 22/10/2021
1949922-202009-N4	Minor	7.3.1	04/09/2020	Closed out on 22/10/2021
1949922-202009-N5	Minor	4.2.3	04/09/2020	Closed out on 22/10/2021
2121147-202110-M1	Major	6.7.3	22/10/2021	Closed out on 11/01/2022
2121147-202110-N1	Minor	6.7.2	22/10/2021	Open
2121147-202110-N2	Minor	3.4.2	22/10/2021	Open

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss TDM Kemaman Palm Oil mill and Supply Base Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Chief Clerk (Gender committee)	Refer interview list	Face to face interview
Office Assistant (New Mother)	Refer interview list	Face to face interview
Assistant Foreman	Refer interview list	Face to face interview
Security Supervisor	Refer interview list	Face to face interview
Security Guard	Refer interview list	Face to face interview
Estate Supervisor	Refer interview list	Face to face interview
Co-operative Manager (Contractor)	Refer interview list	Face to face interview
Estate canteen & sundry shop owners	Refer interview list	Face to face interview

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Estate NUPW representative	Refer interview list	Face to face interview
Creche Ayah	Refer interview list	Face to face interview
Estate Healthcare Assistant	Refer interview list	Face to face interview

Stakeholders comment	
1	<p>Feedbacks: NUPW representatives & Gender Committee So far, there is no complaint or grievance except for the housing maintenances. Workers didn't have any issue regarding salary, freedom to have union and going out, express concern, etc. No discrimination is practised within the complex.</p> <p>Audit Team verification and response: Positive feedbacks noted.</p>
2	<p>Feedbacks: Vendors/Contractors (TDM Kemaman Employee Co-operative Manager) No more issue with late payment since last audit. All invoices cleared upon agreed time within 21 – 30 days.</p> <p>Audit Team verification and response: No further issue.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Kumpulan Ladang-Ladang Terengganu Berhad (Terengganu State Government Incorporated Company)	Current	18,869.67	NA	NA	All estates within SOU Kemaman belongs to the Terengganu State Government Incorporated Company that owns 100% stake in TDM.

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

3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that TDM Kemaman Palm Oil Mill and Supply Base has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that TDM Kemaman Palm Oil Mill and Supply Base is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Muhammad Fadzli b. Masran	Name: HAZI HASSAN BIN OSMAN
Company Name: BSI Services (M) Sdn. Bhd.	Company Name: TDM PLANTATION S/B, KEMAMAN PALM OIL MILL
Title: Client Manager	Title: MILL MANAGER.
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 20/01/2022	Date: 25/01/2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance
Principle 1: Behave ethically and transparently		
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance -</p> <p>Documents that specified in the standard are publicly available such as social and environment impact assessment, action plan, meeting minutes and audit reports.</p> <p>Besides, policies were also displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</p> <p>Staff of TDM Berhad Group on Sustainability Policies for the new policies approved and signed by the CEO on 1/4/2021 as following:</p> <ul style="list-style-type: none"> • Gender Policy • Quality Policy • Social Policy • Children Protection Policy • Freedom of Association Policy • Foreign Workers Policy – Employment Act 1955, Immigration Act 1959/63 & Workers Compensation Act 1952 • Occupational Safety & Health Policy • Environmental & Biodiversity Policy • Agrochemical Management Policy • River Buffer one & Slope Protection Policy • Work Ethics Policy 	Complied

		<ul style="list-style-type: none"> • Human Rights Policy • Reproductive Rights Policy • MSPO Policy <p>Information relevant to RSPO Criteria and stakeholders also shared through the website: http://www.tdmberhad.com.my/#2.</p>	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Information provided in both local Bahasa Malaysia and English for stakeholders such as records of stakeholder consultation via email dated on 5/10/2021. The email consultation involved all Kemaman mill and estates management personnel with relevant stakeholders among contractors, vendors/suppliers, local communities' heads and government agencies.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Records of requests for information and responses are maintained as per sample Pelantoh Estate Stakeholder online (email) consultation dated on 5/10/2021 via survey form. Out of all stakeholders consulted, few responded with positive feedback received from the following stakeholders:</p> <ul style="list-style-type: none"> - Kejuruteraan Prisma - Chong Trading - Cahaya Nilam Enterprise - Eralab KT Sdn. Bhd. 	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>Consultation and communication procedures documented as per developed a Social Issue Communication Flowchart version 2.0/2017. Nominated personnel are the mil & estate managers as well as regional compliance executives. Sighted sample nominated representative for stakeholder consultation and communication i.e. Pelantoh Estate Manager; Management Representative appointment letter date 17/10/2021; Ref. # TDMP/HR-GEN(MSPO/RSPO).</p>	Complied

1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Current list of contact and details of stakeholders 2021 sighted available among contractors, vendors/suppliers, government agencies and local communities' heads as per sample sighted for list of stakeholders Pelantoh Estate 2021.	Complied		
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.					
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	Policy for ethical conduct is in place as per available Polisi Etika Kerja; approved by CEO; dated 1/4/2021. Briefing and training of Code of Ethics & Business Conducts; CoBE TDM; Rev. 01; Approved date: 25/3/2018 for sample: - Ladang Tebak Contractor: Koperasi Ladang Kelapa Sawit Kemaman Terengganu Berhad; Work Order # TB 015/2021; Date: 28/7/2021; Contract period: 1/9/2021 – 30/9/2021 Tebak Estate worker's policy briefing/training; Date: 9/3/2021	Complied		
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Monitoring included inspection visit by mill advisors as well as internal audit conducted. Compliance executive, compliance officer and compliance clerk at each operating unit were appointed to assist in monitoring unit's compliance against applicable legal and certification requirement. Internal audit was latest conducted on 22/8/2021 – 1/9/2021 by sustainability personnel.	Complied		
Principle 2: Operate legally and respect rights					
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.					
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	SOU Kemaman continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and GSQM sustainability team. SOU Kemaman had obtained and renewed license and permits as required by the law. Among others the licenses/permit viewed were; <table border="1" data-bbox="1167 1348 1921 1375"> <tr> <td data-bbox="1167 1348 1771 1375">Permit/license</td> <td data-bbox="1778 1348 1921 1375">validity</td> </tr> </table>	Permit/license	validity	Complied
Permit/license	validity				

		<table border="1" data-bbox="1164 359 1904 406"> <tr> <td data-bbox="1164 359 1220 406">10</td> <td data-bbox="1220 359 1769 406">Metrology Corporation B596701</td> <td data-bbox="1769 359 1904 406">15/03/22</td> </tr> </table> <p data-bbox="1120 462 1937 590">The machinery due in April expiry has been inspected by DOSH on 07/3/2021 for the sand filters, air compressor and back pressure receiver. CF has yet to be issued at the time of audit. Visit report was sighted and verified.</p> <p data-bbox="1120 654 1545 686"><i>Factory and Machinery Act 1967 –</i></p> <p data-bbox="1120 702 1780 734">The following competency requirements were verified:</p> <table border="1" data-bbox="1164 798 1904 1228"> <thead> <tr> <th data-bbox="1164 798 1209 837"></th> <th data-bbox="1209 798 1601 837">Competent person</th> <th data-bbox="1601 798 1904 837">No of personnel.</th> </tr> </thead> <tbody> <tr> <td data-bbox="1164 837 1209 885">1</td> <td data-bbox="1209 837 1601 885">Steam engineer</td> <td data-bbox="1601 837 1904 885">1st grade – 1 Grade 2 - 1</td> </tr> <tr> <td data-bbox="1164 885 1209 933">2</td> <td data-bbox="1209 885 1601 933">Engine Driver (BHC)</td> <td data-bbox="1601 885 1904 933">2- 2nd grade</td> </tr> <tr> <td data-bbox="1164 933 1209 981">3</td> <td data-bbox="1209 933 1601 981">Boilermen</td> <td data-bbox="1601 933 1904 981">2-1st & 3nd grade</td> </tr> <tr> <td data-bbox="1164 981 1209 1061">4</td> <td data-bbox="1209 981 1601 1061">AESP (Authorised Entrant and Standby Person Confined Space)</td> <td data-bbox="1601 981 1904 1061">2 competent persons</td> </tr> <tr> <td data-bbox="1164 1061 1209 1141">5</td> <td data-bbox="1209 1061 1601 1141">AGT (Authorised Gas Tester and Entry Supervisor Confined Space)</td> <td data-bbox="1601 1061 1904 1141">1 competent persons</td> </tr> <tr> <td data-bbox="1164 1141 1209 1189">6</td> <td data-bbox="1209 1141 1601 1189">Electrical Chagemen</td> <td data-bbox="1601 1141 1904 1189">3 - A4 1 AO Chagemen</td> </tr> <tr> <td data-bbox="1164 1189 1209 1228">7</td> <td data-bbox="1209 1189 1601 1228">Int Combustion Engine</td> <td data-bbox="1601 1189 1904 1228">1 - person</td> </tr> </tbody> </table> <p data-bbox="1120 1276 1825 1308"><i>EQ (Prescribed Premise) Crude Palm Oil Regulations 1977</i></p> <p data-bbox="1120 1324 1926 1388">a) Requirement in "Jadual Pematuhan" b) License no / validity period – 004055 valid 30/6/22 at 60mt/hr</p>	10	Metrology Corporation B596701	15/03/22		Competent person	No of personnel.	1	Steam engineer	1 st grade – 1 Grade 2 - 1	2	Engine Driver (BHC)	2- 2 nd grade	3	Boilermen	2-1 st & 3 nd grade	4	AESP (Authorised Entrant and Standby Person Confined Space)	2 competent persons	5	AGT (Authorised Gas Tester and Entry Supervisor Confined Space)	1 competent persons	6	Electrical Chagemen	3 - A4 1 AO Chagemen	7	Int Combustion Engine	1 - person	
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		<p>c) Discharge method – land application – water course d) Scheduled waste (CePSWaM): Mohd Ammar Engineer Dec 20 e) Effluent treatment system (CePPOMETS) Tobari - Feb 2021.</p> <p><i>Air Monitoring</i></p> <p>a) Particulate – Stack sampling was carried out on quarterly basis. b) Noted that monitoring was conducted on (at 12.0%) CO₂.</p> <table border="1" data-bbox="1198 678 1892 769"> <thead> <tr> <th>Boiler no</th> <th>Date</th> <th>Dust concentration</th> <th>EQA std</th> </tr> </thead> <tbody> <tr> <td>TG PMD 232</td> <td>27/9/21</td> <td>TBA</td> <td>150 mg/m³</td> </tr> </tbody> </table> <p>The stack sampling was carried out by <i>Environmental Science (M) Sdn Bhd</i>. The mill has installed ESP anticipated to commission in July 2022. Status of operation still in trial. FFB allowable max processed by the mill in 2020 under MPOB licence no 500041904000 is 384000 mt. The total actual processed from Jan - Dec 2020 is 221466 mt concluding compliance to the licence requirement.</p>	Boiler no	Date	Dust concentration	EQA std	TG PMD 232	27/9/21	TBA	150 mg/m ³	
Boiler no	Date	Dust concentration	EQA std								
TG PMD 232	27/9/21	TBA	150 mg/m ³								
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. - Minor compliance -</p>	<p>The CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them.</p> <p>a) Each estate/mill had its own Legal and Other Requirements Register (LORR) and were being evaluated individually annually for compliance. The legal registers were updated by the person in-charge and approved by the respective Managers. Recent update was on 20/9/2021. b) The GSQM Department is responsible to track changes and the information was disseminated to all its plantations and</p>	Complied								

		<p>Mill department. Among the applicable legal and included in the legal register are</p> <ul style="list-style-type: none"> - Pesticides Act 1974 and Regulations, - Environmental Quality Act 1974 and Regulations, - Factories and Machinery Act 1967 and Regulations, - Occupational Safety and Health Act 1994, - Employment Act 1955, - Labour Act 1955 - Children & Young Person (Employment) Act 2010 - Industrial Relations Act 1967, - Children and Young Persons (Employment) Act 1966 - MPOB Regulations (Licensing) 2005. - Min retirement age Act 2012 - Passport Act 1996 - Uniform Building By-Laws 1984 <p>c) The latest legal register update by GSQM is listed below</p> <ul style="list-style-type: none"> i. Movement Control Order 2020 for Covid-19 ii. Min wages order 2020 rev 15/01/2020 iii. Workers Min Std Housing Amenities (Amendment) Act 1990 revised on 01/6/2020 iv. FMA 1089 (Noise exposure) Revocation 2019 	
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<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>Both 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 2 estates, during the field inspection confirmed that they were clearly marked and maintained.</p> <table border="1" data-bbox="1205 560 1890 839"> <thead> <tr> <th></th> <th>Estate</th> <th>Boundary</th> <th>Neighbouring units</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tebak</td> <td>PR19A</td> <td>Ldg Jernih</td> </tr> <tr> <td>2</td> <td>Tebak</td> <td>P13A</td> <td>RISDA - Ldg Durian Mas</td> </tr> <tr> <td>3</td> <td>Pelantoh</td> <td>PM91D2</td> <td>Ldg Koperasi</td> </tr> <tr> <td>4</td> <td>Pelantoh</td> <td>P20C1</td> <td>Ldg Ketengah Jaya</td> </tr> <tr> <td>5</td> <td>Pelantoh</td> <td>P91B</td> <td>Ldg Tebak</td> </tr> </tbody> </table>		Estate	Boundary	Neighbouring units	1	Tebak	PR19A	Ldg Jernih	2	Tebak	P13A	RISDA - Ldg Durian Mas	3	Pelantoh	PM91D2	Ldg Koperasi	4	Pelantoh	P20C1	Ldg Ketengah Jaya	5	Pelantoh	P91B	Ldg Tebak	<p>Complied</p>
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<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>																											
<p>2.2.1</p>	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>The CU maintained all contracted parties and documented in the stakeholders list updated on Feb 2021 as part of their stakeholders includes among others;</p> <p>a) internal - employee and workers union and b) external - stakeholders I.e FFB suppliers, contractors, transporters c) External - government department.</p> <table border="1" data-bbox="1187 1203 1890 1378"> <thead> <tr> <th></th> <th></th> <th>Pelantoh</th> <th>Tebak</th> <th>KPOM</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Contractors</td> <td>58</td> <td>15</td> <td>15</td> </tr> <tr> <td>2</td> <td>Vendors/Suppliers</td> <td>37</td> <td>20</td> <td>25</td> </tr> <tr> <td>3</td> <td>Local communities head</td> <td>11</td> <td>8</td> <td>8</td> </tr> </tbody> </table>			Pelantoh	Tebak	KPOM	1	Contractors	58	15	15	2	Vendors/Suppliers	37	20	25	3	Local communities head	11	8	8	<p>Complied</p>				
		Pelantoh	Tebak	KPOM																							
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3	Local communities head	11	8	8																							

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		<table border="1" data-bbox="1182 363 1890 549"> <tr> <td>4</td> <td>Other interested parties</td> <td>35</td> <td>27</td> <td>27</td> </tr> <tr> <td>5</td> <td>Employees Association</td> <td>2</td> <td>2</td> <td>2</td> </tr> <tr> <td>6</td> <td>Transporter</td> <td>11</td> <td>-</td> <td>5</td> </tr> <tr> <td>7</td> <td>Employees/Staff</td> <td>4</td> <td>4</td> <td>4</td> </tr> </table> <p data-bbox="1137 603 1930 730">Meeting was held latest on 19/08/20. Thereafter being deferred as results of MCO. The Estates and mill initiated communication with stakeholders via forms feedback distributed to members on 13/10/21. Documents were sighted and verified.</p>	4	Other interested parties	35	27	27	5	Employees Association	2	2	2	6	Transporter	11	-	5	7	Employees/Staff	4	4	4	
4	Other interested parties	35	27	27																			
5	Employees Association	2	2	2																			
6	Transporter	11	-	5																			
7	Employees/Staff	4	4	4																			
2.2.2	<p data-bbox="255 756 1115 852">All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p data-bbox="255 861 1115 957">Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p data-bbox="255 967 501 999">- Minor compliance -</p>	<p data-bbox="1137 756 1930 1069">All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements as verified through Manual Vendor Registration (MVR) and the Vendor Code of Business Conduct (VCOBC) which apply to all contractors for due diligence and meeting legal requirements. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, were clearly stated in contract between TDM and all contractors under clause 10.0 specifying among others following;</p> <ul style="list-style-type: none"> <li data-bbox="1169 1088 1738 1120">a) disallowing child, forced and trafficked labour: <li data-bbox="1169 1123 1617 1155">b) Compliance to laws and regulations <li data-bbox="1169 1158 1783 1190">c) Compliance to RSPO/MSPO standard requirement <li data-bbox="1169 1193 1930 1251">d) The company have rights to conduct compliance inspection (audit) from time to time. 	Complied																				

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2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>All contracts, including those for FFB supplies between TDM Plantations Sdn Bhd among other has included the following under clause 10.0 (<i>Lain-lain perkara</i>) revised dated 22/2/2021;</p> <p>a) disallowing child labour b) Disallowing forced and trafficked labour</p> <p>All contractors or third party had been briefed on 22/2/2021.</p>	Complied
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>The mill received RSPO certified FFB from sister estates and from one RSPO certified outside FFB supplier which is Tabung Tentera Terengganu Estate having details as follows: ·</p> <p>a) Geolocation: 4° 12' 10" N, 103° 13' 59" E b) RSPO Certificate no.: RSPO-PC 00121 · c) MPOB License: 504807102000</p> <p>All the supplying estates were from the TDM estates and possessed the following information which were sighted and verified during the audit</p> <p>a) All FFB from the TDM estates supported by the delivery documents valid copy of RSPO Certificate b) Valid land title with ownership status (refer indicator 4.4.1) c) Valid MPOB licence (refer criteria indicator 2.1.1)</p>	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>The mill received RSPO certified FFB from sister estates and from one RSPO certified outside FFB supplier which is Tabung Tentera Terengganu Estate.</p>	Complied

Principle 3: Optimise productivity, efficiency, positive impacts and resilience																																																		
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.																																																		
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Both the estates, i.e Pelantoh and Tebak continued to commit to long term economic and financial viability. The annual budgets for 2021 to 2025 were sighted. The budget covers activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance etc. The budget also included projections on yield/ha, and total cost of production per m ton, per ha and CAPEX - capital expenditure mainly for buildings, furniture and others asset related expenses. The estates adopted the following format for the annual budget.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Year</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Mature Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Immature Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Total Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>FFB Tons</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Yld/Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>RM/mt FFB</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>RM/ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> </tbody> </table> <p>Similarly the mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning. The business plan among others contains;</p> <ul style="list-style-type: none"> a) FFB Processing & CPO/CPK production forecast b) Extraction Ratios – OER / KER, c) Cost of production <p>- administration / labour overhead</p>	Year	2021	2022	2023	2024	2025	Mature Ha	x	x	x	x	x	Immature Ha	x	x	x	x	x	Total Ha	x	x	x	x	x	FFB Tons	x	x	x	x	x	Yld/Ha	x	x	x	x	x	RM/mt FFB	x	x	x	x	x	RM/ha	x	x	x	x	x
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		<ul style="list-style-type: none"> - processing cost labour, maintenance, consumables - depreciation and head office charges- - EVIT running accounts - CAPEX - capital expenditure. <table border="1" data-bbox="1184 572 1827 1026"> <thead> <tr> <th>Year</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>FFB processed</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>OER</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>KER</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Administration</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Processing cost</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Depreciation</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>H Q charges</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>RM/mt FFB</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>RM/mt CPO</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> </tbody> </table>	Year	2021	2022	2023	2024	2025	FFB processed	x	x	x	x	x	OER	x	x	x	x	x	KER	x	x	x	x	x	Administration	x	x	x	x	x	Processing cost	x	x	x	x	x	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	
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3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>The long-range replanting programs (LRRP) until 2027 were sighted on all the Estates. The program is reviewed annually and incorporated into their annual financial budget. The program sighted for the next 5 years in hectares was as follows:</p> <table border="1" data-bbox="1184 1190 1827 1326"> <thead> <tr> <th>Year</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>Pelantoh</td> <td>276.7</td> <td>607.1</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Tebak</td> <td>565.3</td> <td>396.3</td> <td>398.2</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	Year	2022	2023	2024	2026	2027	Pelantoh	276.7	607.1	0	0	0	Tebak	565.3	396.3	398.2	0	0	Complied																																										
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<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 (Marketing Operations Meeting) was held on a Group basis chaired by the Plantation CEO incorporating all estates and mill in the region.</p> <table border="1" data-bbox="1207 491 1814 679"> <thead> <tr> <th></th> <th>Estate/Mill</th> <th>Date of meeting</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kemaman POM</td> <td>12/10/20</td> <td>13</td> </tr> <tr> <td>2</td> <td>Tebak Estate</td> <td>12/10/20</td> <td>13</td> </tr> <tr> <td>3</td> <td>Pelantoh Estate</td> <td>12/10/20</td> <td>13</td> </tr> </tbody> </table> <p>The agenda discussed among others includes the following;</p> <ul style="list-style-type: none"> a) Results of internal audits b) Customer feedback c) Process performance and product conformity d) Status of preventive & corrective actions e) Changes that could affect the management system f) Recommendation for improvement g) Human Resources 		Estate/Mill	Date of meeting	Attendees	1	Kemaman POM	12/10/20	13	2	Tebak Estate	12/10/20	13	3	Pelantoh Estate	12/10/20	13	<p>Complied</p>
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<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>																			
<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -</p>	<p>In consideration to of environmental and social impact, the operating units has established continuous improvement plan. Among the plan established FY 2021 as follows: Mill</p> <ol style="list-style-type: none"> 1. To install ESP plant and hire competent person 2. To build biogas plant and hire competent person 3. To monitor and provide health screening for COVID 19 include swab test for all visitors 	<p>Complied</p>																

		<p>Plantation</p> <ol style="list-style-type: none"> 1. Beneficial plant planting such as Tunera Subulata to control pest 2. Frond stacking to enhance beneficial microbe and nitrogen-fixing bacteria to enhance soil fertility 3. EFB mulching application as organic fertiliser 4. To use barrels to collect rainwater 	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>RSPO metrics template for TDM Kemaman POM and Supply Base were made available for verification found to be consistent with evidence sighted.</p>	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>The mill processing system is documented in the Standard Operating Procedure SOP - Plantation Management System TDM Plantation Sdn Bhd - Kemaman Palm Oil Mill effective 01/2011 which includes;</p> <ol style="list-style-type: none"> a) The mill SOP, b) The Mill Quality Management Manual <p>These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from;</p>	Complied

		<p>a) the reception, sterilization, threshing, pressing, b) clarification, depericarping (nut polishing) station, c) effluent, laboratory, workshop, dispatches etc. In addition, there are also manuals available within the industry and MPOB that are used as guidelines.</p> <p>The standard operation procedure SOP for the estates operations is available which is prepared on Group basis. There are levels of the documentation identified as follows; a) Level 1 standard operating procedure b) Level 2 work instruction c) Level 3 records. - Amendments are made should there be requirement to suit the local issues/situation. All documents were sighted and verified.</p>																			
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p>	<p>The Agronomy and Advisory Department, Sustainability Unit, Plantation Controller and relevant Head Office personnel including the CEO inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. The mechanism practiced in TDM are described below.</p> <table border="1" data-bbox="1189 1086 1868 1391"> <thead> <tr> <th colspan="2">Pelantoh & Tebak Estates</th> </tr> <tr> <th>Areas</th> <th>Action/Activities</th> </tr> </thead> <tbody> <tr> <td rowspan="3">1</td> <td>Daily</td> <td>Supervision by field staff/Assist/Manager</td> </tr> <tr> <td></td> <td>Report of daily activities/costings/variation</td> </tr> <tr> <td></td> <td>WA group - digital supervision</td> </tr> <tr> <td rowspan="5">2</td> <td rowspan="5">Schedule</td> <td>Quarterly ESH meeting</td> </tr> <tr> <td>SU visits on field activities</td> </tr> <tr> <td>Internal audits by IAD/AAD</td> </tr> <tr> <td>Annual EPMC</td> </tr> <tr> <td>External audit RSPO /MSPO</td> </tr> </tbody> </table>	Pelantoh & Tebak Estates		Areas	Action/Activities	1	Daily	Supervision by field staff/Assist/Manager		Report of daily activities/costings/variation		WA group - digital supervision	2	Schedule	Quarterly ESH meeting	SU visits on field activities	Internal audits by IAD/AAD	Annual EPMC	External audit RSPO /MSPO	Complied
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3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	Operating units visited maintained all records of monitoring and available for review. There are several levels of records beginning from the field/mill supervisors to executives and the Managers. The Plantation Controller (PC) are accountable to monitor the estates compliance towards the SOP, Budget and Productivity among others. Estates / Mill performances are reviewed during the monthly meeting with PC/CE/CEO.	Complied																											
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>																														
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected	No new planting in estates within Kemaman POM supply base. The last SIA was conducted on 23/10/2011 to 1/11/2011 as per report prepared by SRA Consultancy dated November 2011. The Internal	Complied																											

	<p>stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>SEIA report for RSPO-New Planting Procedure at OP81R1 (previous field), P2011A (current field) area of 15.00 Ha in expected month of felling is Nov 2018. The social aspect sighted were:</p> <ul style="list-style-type: none"> - Security to surrounding - Safety and health - Communication - Economic livelihood <p>Tebak Estate SEIA plan was updated on 1/2/2021.</p> <p>The mill had established Environmental Impact Assessment (EIA) procedure and has been documented as per KPOM Environmental Aspect and Impact Identification (TDM/ KPOM /01 rev. KPOM -01-2011). All significant impacts have been determined and mitigation plan was developed thereafter as per document KPOM Environmental Improvement Plan/Pollution Prevention Plan reviewed in Jan 2021. Kemaman Palm Oil Mill The environmental management plan are reviewed annually and documented in KPOM Environmental Aspect and Impact Identification (TDM/ KPOM /01 rev. KPOM -01-2011). The latest document review being dated Jan 2021. There was NIL changes made.</p> <p>Similarly for the estates the EAI and EIE was available for each activity reviewed dated reviewed Jan 2021. This aspect and impact include activities among others</p> <ul style="list-style-type: none"> a) Construction / building maintenance b) power station / workshop activity c) Harvesting / spraying d) Fertilizer / Compost application e) Replanting 	
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		<p>The Estates have established Environmental Management Plan 2021 with identification to the the mitigation plan for negative impacts, time plan and the PIC stated therein. All sites and the reports were visited and sighted respectively by the auditors in presence of the SU, estates and mill personnel. There are no new plantings or operations within SOU Kemaman. However there were plans and impact assessments relating to environmental impacts based on documents as following;</p> <ul style="list-style-type: none"> a) Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register 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 c) Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE. <p>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. Managers and Assistant Managers of mill and estates were identified as the PIC. The programs relating to operations, environmental and social enhancement were planned by the management as summarised below.</p>	
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		<table border="1"> <tr> <td colspan="4">Kemaman POM</td> </tr> <tr> <td></td> <td>Date</td> <td>Activities</td> <td>Description</td> </tr> <tr> <td>1</td> <td>2021</td> <td>Operations</td> <td>ESP - RM2.2M due in Jan 2022.</td> </tr> <tr> <td>2</td> <td>2021</td> <td>Operations</td> <td>Boiler - facilities of EFB as fuel.</td> </tr> <tr> <td>3</td> <td>2024</td> <td>Operations</td> <td>Relocation of bulk storage tank</td> </tr> <tr> <td colspan="4"> </td> </tr> <tr> <td colspan="4">Pelantoh Estate</td> </tr> <tr> <td>1</td> <td>2021</td> <td>Operations</td> <td>3 unit Concrete bridges - RM66K</td> </tr> <tr> <td>2</td> <td>2021</td> <td>Social</td> <td>16 units new houses - RM64K</td> </tr> <tr> <td>3</td> <td>2022</td> <td>Operations</td> <td>Electric fencing - 410 ch - RM65K</td> </tr> <tr> <td>4</td> <td>2022</td> <td>Operations</td> <td>6 unit concrete bridges - RM132K</td> </tr> <tr> <td>5</td> <td>2022</td> <td>Social</td> <td>24 units housing - RM661K</td> </tr> <tr> <td>6</td> <td>2022</td> <td>Operations</td> <td>6 units chantas - RM60K</td> </tr> <tr> <td>7</td> <td>2023</td> <td>Social</td> <td>2 unts houses - RM280K</td> </tr> <tr> <td colspan="4"> </td> </tr> <tr> <td colspan="4">Tebak Estate</td> </tr> <tr> <td>1</td> <td>2021</td> <td>Operations</td> <td>7 units land surf - in-field collection - RM100K</td> </tr> <tr> <td>2</td> <td>2022</td> <td>operations</td> <td>Concrete bridges - 2 units RM70K</td> </tr> <tr> <td>3</td> <td>2021</td> <td>Operations</td> <td>5 units chantas - RM24.5K</td> </tr> <tr> <td>4</td> <td>2022</td> <td>Social</td> <td>16 units housing - RM497K</td> </tr> </table>	Kemaman POM					Date	Activities	Description	1	2021	Operations	ESP - RM2.2M due in Jan 2022.	2	2021	Operations	Boiler - facilities of EFB as fuel.	3	2024	Operations	Relocation of bulk storage tank					Pelantoh Estate				1	2021	Operations	3 unit Concrete bridges - RM66K	2	2021	Social	16 units new houses - RM64K	3	2022	Operations	Electric fencing - 410 ch - RM65K	4	2022	Operations	6 unit concrete bridges - RM132K	5	2022	Social	24 units housing - RM661K	6	2022	Operations	6 units chantas - RM60K	7	2023	Social	2 unts houses - RM280K					Tebak Estate				1	2021	Operations	7 units land surf - in-field collection - RM100K	2	2022	operations	Concrete bridges - 2 units RM70K	3	2021	Operations	5 units chantas - RM24.5K	4	2022	Social	16 units housing - RM497K	
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3	2024	Operations	Relocation of bulk storage tank																																																																																
Pelantoh Estate																																																																																			
1	2021	Operations	3 unit Concrete bridges - RM66K																																																																																
2	2021	Social	16 units new houses - RM64K																																																																																
3	2022	Operations	Electric fencing - 410 ch - RM65K																																																																																
4	2022	Operations	6 unit concrete bridges - RM132K																																																																																
5	2022	Social	24 units housing - RM661K																																																																																
6	2022	Operations	6 units chantas - RM60K																																																																																
7	2023	Social	2 unts houses - RM280K																																																																																
Tebak Estate																																																																																			
1	2021	Operations	7 units land surf - in-field collection - RM100K																																																																																
2	2022	operations	Concrete bridges - 2 units RM70K																																																																																
3	2021	Operations	5 units chantas - RM24.5K																																																																																
4	2022	Social	16 units housing - RM497K																																																																																
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 development of Social Management Plan activities involved discussion with the following parties among others;</p> <ul style="list-style-type: none"> a) Estate management, b) Workers and staff as the internal stakeholders c) External stakeholders compiled from issues raised during the meetings. d) Management meetings identifying issues in relation to social and environmental e) Observation on sites and surrounding 	Non-compliance																																																																																

		<p>However, it was found in Kemaman POM, Pelantoh Estate & Tebak Estate that the Management Action Plan developed in all operating units that involved an online external stakeholder survey as well as internal stakeholders found insufficient to include potential and actual issues occurred related to foreign workers late work permit renewals and abscondment which potentially due to Covid-19 pandemic.</p> <p>This indicated that the social management and monitoring plans developed was insufficiently included the participation of affected stakeholders.</p> <p>Hence, a Minor NC has been raised on the matter.</p> <p>The development of both Social and Environmental Management Plan activities involved discussion with the following parties among others;</p> <ul style="list-style-type: none"> a) estate management, b) Workers and staff as the internal stakeholders c) External stakeholders compiled from issues raised during the meetings. d) Management meetings identifying issues in relation to social and environmental e) observation on sites and surrounding, f) The assessment in aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control. 	
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<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>The Social Action Plan available for each units were available having information i.e. issues, management plan, PIC and time frame. The input are gathered from the meeting minutes</p> <ul style="list-style-type: none"> a) Gender Committee, NUPW, b) Safety Meeting, <p>Complaint & Request from internal & external stakeholders and muster briefing) as per sample KPOM SIA Action Plan as at 2020/2021; Date: Review: 1/3/2021</p> <p>The Social/Environmental Action Plan available for each units were available having information i.e issues, management plan, PIC and time frame. The input are gathered from the meeting minutes</p> <ul style="list-style-type: none"> a) Gender Committee, NUPW, b) Safety Meeting, c) Complaint & Request from internal & external stakeholders and muster briefing). the recent being made via feedback using forms distributed by the management. <p>The activities involved discussion with the estate management, sighting the documentation, observation on sites and surrounding, and interview with stakeholders adjacent to the conversion areas.</p> <p>The assessment covered the aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control. Feedback were obtained through questionnaire with stakeholders.</p>	<p>Complied</p>
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Criterion 3.5: A system for managing human resources is in place.

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3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination are documented As per Employment of Estate and Mill Workers Procedure; Ref. TDMP/SMP/3/01.01; Date: 2/11/2016 for local employees appointment. For foreign workers employment, the procedure documented as per SOP B6: Foreign Workers Recruitment; Rev. dated May 2017. The documented procedures also being displayed on the notice boards at strategic area within offices of mill and estates for viewing.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Employment procedures been explained to worker during the induction training on their first time arrival as per sample job description, Pakar Penuai (Harvesting Specialist/Cutter)</p> <p>Seen the training certificates for the workers who has attended the induction training records during early employment kept in workers' personnel files.</p>	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>TDM Plantations has established the SOP for risk assessment to identify H&S issue documented in the Standard Operating Procedure (HIRARC) edition TDMP/01, rev. no. TDMP-02/2018 dated 22/10/2018.</p> <p>The risk assessment process has been describe in the SOP accordingly. As per SOP, HIRARC review to be conducted as follows:</p> <ul style="list-style-type: none"> i. At least once a year ii. Immediately whenever there is an accident, near miss or dangerous occurrence iii. When there is changes in the work method iv. When new machines and technology are introduced 	Complied

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		<p>v. When there is new activity, process or operations</p> <p>The mill and estates have conducted assessment for risk on all the operations and documented in Hazard Identification, Risk Assessment, and Risk Control (HIRARC) and chemical Hazard Risk Assessment. The assessment cover all main operations and support operations. The HIRARC was reviewed at minimum once a year, if accident occur or changes on the operation.</p> <p>The latest HIRARC review was conducted as follows:</p> <table border="1" data-bbox="1151 660 1919 1031"> <thead> <tr> <th>Operating Unit</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Kemaman POM</td> <td>23/09/2021 on Vehicle Driver due to accident occur on 21/09/2021</td> </tr> <tr> <td>Pelantoh Estate</td> <td>10/03/2021 on spraying operation due to occupational disease incident to sprayers as per medical surveillance report conducted on 03/02/2021 26/06/2021 for second annual review</td> </tr> <tr> <td>Tebak Estate</td> <td>09/02/2021 for annual review FY 2021</td> </tr> </tbody> </table>	Operating Unit	Date	Kemaman POM	23/09/2021 on Vehicle Driver due to accident occur on 21/09/2021	Pelantoh Estate	10/03/2021 on spraying operation due to occupational disease incident to sprayers as per medical surveillance report conducted on 03/02/2021 26/06/2021 for second annual review	Tebak Estate	09/02/2021 for annual review FY 2021	
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Tebak Estate	09/02/2021 for annual review FY 2021										
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The mill and estates has established OSH Plan FY 2021. Reviewed the implementation of the management plan as follows:</p> <p>Kemaman POM</p> <ol style="list-style-type: none"> The mill send workers involved in chemical handling for medical surveillance on annually basis. Latest medical surveillance was conducted on 23 - 24/03/2021. 12 workers was send for surveillance and found fit to work as chemical handlers. 	Complied								

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		<ol style="list-style-type: none"> 2. The mill conducted LEV monitoring on weekly basis. reviewed the monitoring records dated 06/10/2021, 13/10/2021, 08/09/2021, 18/09/2021, 23/08/2021 and 30/08/2021 3. The mill monitored the first aid on monthly basis. reviewed the monitoring records dated 16/09/2021, 23/06/2021 and 26/05/2021 4. Latest annual audiometric test by Hygiene Tech with reg. no HQ/20/JHII/00/0029 on 19/04/2021. 5. The mill conducted monitoring/inspection for all firefighting equipment on monthly basis. reviewed the monitoring records dated 07/09/2021, 05/08/2021, 15/06/2021 and 03/05/2021. <p>Pelantoh Estate</p> <ol style="list-style-type: none"> 1. Latest Chemical Hazard Risk Assessment was conducted on 11/05/2021 by OHD with reg. no. JKPP HQ/10/ASS/00/8 as per report no. JKPP HQ/10/ASS/00/8 2021/060. 2. Baseline Noise Risk Assessment was conducted on 23/08/2020 by assessor with reg. no. HQ/06/PEB/00/69 as per report no. R-NE-20-TDM LPH-09 dated 29/08/2020. 3. Latest annual audiometric test was conducted 12 – 14/10/2021 as recommended in Baseline Noise Risk Assessment Report no. R-NE-20-TDM LPH-09 dated 29/08/2020. The report has yet to be received by the estate. 4. The estate conducted medical surveillance for sprayers on annually basis. Latest medical surveillance was conducted 	
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		<p>on 03/02/2021. Total of 20 workers were sent for surveillance and 1 was found unfit to work with pesticides. JKPP 7 was submitted to DOSH on 13/02/2021. The involved workers was changed to other job as per letter dated 18/02/2021.</p> <p>Tebak Estate</p> <ol style="list-style-type: none"> 1. Latest Chemical Hazard Risk Assessment was conducted on 01/06/2021 by OHD with reg. no. JKPP HQ/10/ASS/00/8 as per report no. JKPP HQ/10/ASS/00/8 2021/069. 2. The estate conducted medical surveillance as per recommendation by CHRA on annually basis. Latest medical surveillance was conducted 01/02/2021. Total of 23 workers were send for surveillance and found fit to work as chemical handlers. 3. The estate conducted medical screening for sprayers on monthly basis. Reviewed the screening reports dated 06/10/2021, 15/09/2021, 29/08/2021 and 18/07/2021. 4. Noise Risk Assessment was conducted on 18/10/2021 by assessor with reg. no. HQ/06/PEB/00/69 as per report no. R-NE-20-TDM LTK-16 dated 18/11/2020. Base on the report, audiometric was recommended to be conducted on annually basis. Latest audiometric was conducted on 17/10/2021. The report has yet to be received by the estate. 5. The estate monitor the first aid box on monthly basis. Reviewed the monitoring records dated 12/09/2021, 30/08/2021, 25/07/2021 and 23/06/2021. 	
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Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The mill and estate conducted training need analysis to identify training required for the employee and documented in OSH Plan Training Matrix and Training Schedule.</p> <p>The mill mill and estate has established training schedule FY 2021 base on training need analysis conducted. The training program covers Policy, operation and OSH/others.</p> <p>The program involve the executive, staff/field supervisor, workers and contractors. The identified training was programmed throughout the year.</p> <p>The mill and estate has also conducted assessment to the training attendees to assess the training efficiency.</p>	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>The operating units maintained the training records conducted. Reviewed the training records as follows:</p> <p>Kemaman POM</p> <ol style="list-style-type: none"> 1. First Aid training dated 15/03/2021 and 04/07/2021 2. Fire drill training dated 20/06/2021 3. Water treatment for boiler and water treatment plant Chemical handling training dated 05/04/2021 4. FFB Grading training dated 11/02/2021 5. PPE awareness training dated 05/01/2021 6. RSPO and MSPO supply chain traceability training dated 15/03/2021 7. Safety and sustainability briefing to contractors dated 02/03/2021 8. Scheduled waste management training dated 09/03/2021 	Complied

		<p>9. Legal requirement register refresher training dated 16/09/2021</p> <p>10. SOP for COVID 19 briefing dated 08/06/2021</p> <p>Pelantoh Estate</p> <ol style="list-style-type: none"> 1. Noise exposure and PPE training dated 16/01/2021 2. First aid kit training dated 17/03/2021 3. Legal identification and interpretation training dated 15/09/2021 4. Safety awareness on electrical dated 21/04/2021 5. Harvesting SOP training dated 19/04/2021 6. Scheduled waste management and use and standard exposure of chemicals hazardous to health training dated 19/01/2021 7. Fire extinguisher usage training dated 10/01/2021 8. Working at height training dated 28/12/2020 9. Safety and sustainability for contractors briefing dated 28/02/2021 10. Safety driving and vehicle preventive maintenance training dated 07 – 08/04/2021 <p>Tebak Estate</p> <ol style="list-style-type: none"> 1. IPM beneficial plant planting dated 07/10/2021 2. First aid treatment for first aid kit holder training dated 05/10/2021 3. Land surf training dated 05/09/2021 4. Alion usage and spraying SOP training dated 14/06/2021 	
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		<ol style="list-style-type: none"> 5. Badang/mechanical buffalo training dated 25/06/2021 6. Preventive maintenance vehicle and safety driving training dated 07 – 08/04/2021 7. Spraying training by Macrotech Solution Sdn. Bhd. dated 16/03/2021 8. Working at height training dated 14/01/2021 9. Fire drill and firefighting training dated 14/09/2021 	
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>The mill continuously provided training to the personnel involved in SCCS such as Compliance Executive, supervisor, lab assistant, storekeeper, chief clerk, clerk, weighbridge clerk and security. Sighted the training material and training records as follows:</p> <ol style="list-style-type: none"> 1. RSPO and MSPO supply chain traceability training dated 15/03/2021 <p>The compliance Executive has been appointed as the person responsible for SCCS and has undergo and completed RSPO endorsed RSPO SCC training course in Jan 2019.</p>	Complied
<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB</p>	<p>As per SOP established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 dated July 2018 under Glossary section define the meaning of RSPO Identity preserved as supply chain model assured that the RSPO certified oil palm product delivered to the end user uniquely identifiable to a single RSPO certified supply base.</p>	Complied

	without physically separating them, then only Mass Balance Module is applicable.		
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>As per SOP established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 under Glossary section define the meaning of RSPO Identity preserved as supply chain model that allows certified claim to be transferred from one palm oil products to another through physical blending or administratively under strictly control circumstances.</p> <p>As the Kemaman POM is using Identity Preserve, the criteria is non-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&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim). Seen the Member ID: RSPO_PO1000001053 and license ID no. CB111958 valid until 31/10/2021.</p>	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</p>	<p>Addressed in SOP established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 dated July 2018.</p> <p>Among the subjects covered in the procedure are:</p> <ol style="list-style-type: none"> 1. Introduction 	Complied

	<ul style="list-style-type: none"> b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<ul style="list-style-type: none"> 2. Objectives 3. Responsibilities 4. Control of documents and records 5. Delivery FFB from estate 6. Receiving FFB at the mill 7. Process monitoring 8. CPO and PK dispatch 9. Non-conforming products and/or documents 10. Products claims 11. Outsourced contractor 12. Training 13. Reclassification of mill’s supply chain models 14. Production line 15. Conversion factors 16. Internal audit 17. Complaints 18. Management review 	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: 	<p>Addressed in SOP established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 dated July 2018 under section 16 – Internal Audit.</p> <p>RSPO supply chain internal audit has been conducted on 10/03/2021. 2 issue raised during the audit and has been</p>	Complied

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	<p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>addressed by the mill. The results of Internal Audit were discussed in the Management Review Meeting.</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>Addressed in SOP established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 dated July 2018 under section 5 - Delivery FFB from estate and 6 - Receiving FFB at the mill.</p> <p>The mill received RSPO certified FFB from TDM Plantations estates and other company. The mill have system to verify at the weighbridge. Information for RSPO certified FFB were recorded in FFB Consignment notes and weighbridge tickets. Records verified during the audit as follow:</p> <p>Sighted the sampled delivery off FFB as follows:</p> <table border="1" data-bbox="1153 1177 1921 1374"> <tr> <td data-bbox="1153 1177 1541 1374"> <p>Pelantoh Estate</p> <p>Date: 16/09/2021</p> <p>C/N no.: 45360</p> <p>RSPO Cert. no.: RSPO 587626</p> </td> <td data-bbox="1541 1177 1921 1374"> <p>Tebak Estate</p> <p>Date: 16/09/2021</p> <p>C/N no.: 26486</p> <p>RSPO Cert. no.: RSPO 587626</p> </td> </tr> </table>	<p>Pelantoh Estate</p> <p>Date: 16/09/2021</p> <p>C/N no.: 45360</p> <p>RSPO Cert. no.: RSPO 587626</p>	<p>Tebak Estate</p> <p>Date: 16/09/2021</p> <p>C/N no.: 26486</p> <p>RSPO Cert. no.: RSPO 587626</p>	<p>Complied</p>
<p>Pelantoh Estate</p> <p>Date: 16/09/2021</p> <p>C/N no.: 45360</p> <p>RSPO Cert. no.: RSPO 587626</p>	<p>Tebak Estate</p> <p>Date: 16/09/2021</p> <p>C/N no.: 26486</p> <p>RSPO Cert. no.: RSPO 587626</p>				

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		<p>W. Ticket no.: P0294497 Net Weight: 3,940 kg</p> <p>Date: 16/09/2021 C/N no.: 42421 RSPO Cert. no.: RSPO 587626</p> <p>W. Ticket no.: P0294466 Net Weight: 2,310 kg</p>	<p>W. Ticket no.: P0294487 Net Weight: 9,550 kg</p> <p>Date: 16/09/2021 C/N no.: 26595 RSPO Cert. no.: RSPO 587626</p> <p>W. Ticket no.: P0294459 Net Weight: 9,300 kg</p>	
		<p>Other Company</p> <div data-bbox="1151 849 1541 1190" style="border: 1px solid black; padding: 5px;"> <p>Tabung Tentera Estate Date: 02/03/2021 C/N no.: DO0358 RSPO Cert. no.: RSPO PC00121 W. Ticket no.: P0285818 Net Weight: 34,850 kg</p> </div>		
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single</p>	<p>Addressed in SOP established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 dated July 2018 under section 8. CPO and PK dispatch.</p>		<p>Complied</p>

<p>document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>Sampled of the sales and goods out delivery records as below:</p> <p>CSPO</p> <ul style="list-style-type: none"> a. The name and address of the buyer: Ngo Chew Hong Oils & Fats (M) Sdn. Bhd b. The name and address of the seller: Kemaman POM c. The loading or shipment / delivery date: 19/09/2021 d. The date on which the documents were issued: 19/09/2021 e. RSPO certificate number: RSPO 587626 f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): CSPO SG g. The quantity of the products delivered: 42,470 kg h. Any related transport documentation: Weighbridge Ticket no. S0119346 i. A unique identification number: Contract Ref.: SGPO-210920 <p>CSPK</p> <ul style="list-style-type: none"> a. The name and address of the buyer: Hup Lee Oil Mill Sdn. Bhd b. The name and address of the seller: Kemaman POM c. The loading or shipment / delivery date: 19/08/2021 d. The date on which the documents were issued: 19/08/2021 e. RSPO certificate number: RSPO 587626 f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or 	
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		<p>the approved abbreviations): CSPK-SG</p> <ul style="list-style-type: none"> g. The quantity of the products delivered: 44,330 kg h. Any related transport documentation: Weighbridge Ticket no.: S0118470 i. A unique identification number: Contract Ref.: SGPK-210702 <p>The RSPO certificate number has been rectified from RSPO 587626.</p>	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective 	<p>Addressed in SOP established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 dated July 2018 under section 8. CPO and PK dispatch.</p> <p>Reviewed contract agreement between TDM Plantation Sdn. Bhd and Koperasi Ladang Kelapa Sawit Kemaman Terengganu Berhad dated 01/01/2019 and contract extension letter dated 29/07/2020.</p> <p>The contract agreements specified that all transporters are required to fulfil and comply with applicable legal requirements as well as TDM own requirements which include the RSPO and MSPO standard.</p>	Complied

	operations, systems, and all information, when this is announced in advance.		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Stated in the contract agreement between TDM Plantation Sdn. Bhd and Koperasi Ladang Kelapa Sawit Kemaman Terengganu Berhad dated 01/01/2019 "1. Asas Bekalan Perkhidmatan".	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.	Stated in the contract extension letter between TDM Plantation Sdn. Bhd and Koperasi Ladang Kelapa Sawit Kemaman Terengganu Berhad dated 29/07/2020 under section 1.3 stated as follows: "The service provider shall authorize any representative of the unit/division of the buyer to conduct compliance inspections/audits from time to time".	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. 	<p>TDM has established Standard Operating Procedure to maintain all records of evidence on the implementation of RSPO SCCS. The SOP was documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 dated July 2018 under section 5.0: Control of Documents and Records.</p> <p>As stated in SOP under section 5.0: Control of Documents and Records all traceability records should be maintained at minimum period of 3 years.</p> <p>Kemaman POM receives and process only certified FFB. Therefore, it uses the Identity Preserve supply chain system and module.</p> <p>Kemaman POM has established the SCCS Mass balance sheet document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>All volumes of certified CPO and PK that were delivered were deducted from the material accounting system according to conversion ratios of OER and KER.</p>	Complied

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	<p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>Reviewed the SCCS Mass Balance Sheet for the period of January – March 2020, April – June 2020, July – September 2020, October – December 2020, January – March 2021, April – June 2021 and July – September 2021.</p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Addressed in the Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL- 01/2018 dated July 2018 under section 17.0 Conversion Factor.</p> <p>Extraction rates were derived from actual production output that were measured daily by the mill and recorded in the daily production report. Reviewed daily production records dated 06/07/2021, 31/08/2021 and 30/09/2021</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>Extraction rates updated daily based on actual measurement of production output. Projected rates were based on historical extractions and FFB projection from estates.</p>	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Addressed in the Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL- 01/2018 dated July 2018 under section 7.0 receiving FFB at the mill and 9.0 Process Monitoring.</p> <p>Kemaman POM received only certified FFB. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p>	Complied
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to</p>	<p>Based on the downloaded transactions register from the certification unit’s Palmtrace, the company was able to</p>	Complied

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	refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	demonstrate that it has been registering its transactions in the Palmtrace accordingly. Based on the announcement (transaction) summary, all the registrations were found to be in order.	
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	Kemaman POM did not use any of the general corporate communications.	Not Applicable
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.	Kemaman POM did not use any of the general corporate communications.	Not Applicable
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Kemaman POM did not use any of the general corporate communications.	Not Applicable

4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	Kemaman POM did not use any of the general corporate communications.	Not Applicable
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	Kemaman POM did not use any of the general corporate communications.	Not Applicable
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Kemaman POM did not use business to business communications.	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.	Kemaman POM did not use business to business communications.	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.	Kemaman POM did not use business to business communications.	Not Applicable

Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	Kemaman POM did not use business to consumer communications	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Kemaman POM did not use business to consumer communications	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Kemaman POM did not use business to consumer communications	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Kemaman POM did not use business to consumer communications	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Kemaman POM did not use business to consumer communications	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	Kemaman POM did not use business to consumer communications	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Kemaman POM did not use business to consumer communications	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use	Kemaman POM did not use business to consumer communications	Not Applicable

	<p>of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>		
<p>MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES (delete if not applicable)</p>			
<p>Certified oil palm content (IP)</p>			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>There is no usage of IP claim in Kemaman POM.</p>	<p>Not Applicable</p>
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>There is no usage of IP claim in Kemaman POM.</p>	<p>Not Applicable</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>There is no usage of IP claim in Kemaman POM.</p>	<p>Not Applicable</p>
<p>Labelling and trademark (IP)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately 	<p>There is no usage of IP claim in Kemaman POM.</p>	<p>Not Applicable</p>

	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.		
Messaging (IP)			
	Members are allowed to use the RSPO label in one of the following ways: <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	There is no usage of IP claim in Kemaman POM.	Not Applicable
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Kemaman POM has the implemented TDM's Human Rights Policy; Signed by Haji Mohd. Ghozali Bon Yahaya; Chief Executive Officer (CEO); Dated on 1/4/2021 where they committed to recognizing the role of Human Rights Defenders in accordance with the United Nations Guiding Principles on Business And Human Rights as well as convention standards of International Labour Organization and local acts.</p> <p>Policy was communicated and briefed to all workers in order for them to understand their responsibility in respect of human rights and displayed on strategic locations within all Kemaman POM operating units as per sample Kemaman POM Policy briefing as following:</p>	Complied

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		<ul style="list-style-type: none"> - Child Protection Policy 19/1/2021 - HRD Policy date: 23/2/2021 - Gender Policy date: 12/1/2021 - Social Policy date: 26/1/2021 - Work Ethics Policy date: 23/2/2021 - MSPO Policy date: 23/3/2021 - Reproductive Rights Policy date: 19/1/2021 <p>Freedom of Association Policy date: 23/3/2021</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Kemaman POM has the implemented TDM's Human Rights Policy; Signed by Haji Mohd. Ghozali Bon Yahaya; Chief Executive Officer (CEO); Dated on 1/4/2021 where the management is committed to contributing to a better society.</p> <p>TDM also has established flowchart for handling Sexual Harassment complaint in workplace. The management is required to investigate within 2 days from the date of receiving the complaints. This is demonstrated by the certification unit where no harassment or violence occurred or reported by the workers.</p>	Complied
<p>Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>TDM has established a flowchart on handling social issue. Two-way communication was the method been utilized by the management. The management has to discuss the issue raised by stakeholders within 2 weeks for the first meeting and full timeframe is within 30 days.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p>	<p>Verification with stakeholders confirmed that the procedures were well understood in case of any necessary.</p>	Complied

	- Minor compliance -		
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	Neither any complaints nor land dispute occurred within SOU Kemaman 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 -	TDM has established a flowchart on handling social issue. Two-way communication was the method been utilized by the management. The management has to discuss the issue raised by stakeholders within 2 weeks for the first meeting and full timeframe is within 30 days. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow.	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	Kemaman POM and supply bases demonstrated participation in community development towards local communities through various contributions as per sample sighted as following: - Kemaman POM Contribution of food basket to all employees during EMCO; 5/8/2021 - Pelantoh Estate Contribution of Grass Cutting Tractor for SK Padang Kubu football field grass cutting; 23/5/2021 Tebak Estate: Contribution to joint program of malaria & filariasis control and prevention through mass blood survey; 27/9/2021	Complied
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the	The estates and mill are on government lease land and they hold copies of Land Titles. Original land title document is kept at head office while a copy of it is available at estate's office. At least four	Complied

	<p>history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>of the estates within SOU Kemaman mainly Tebak, Jernih, Air Putih and Pelantoh shared their land titles with demarcation only with individual estate's field map among each other. These mainly for estates located within mukim Tebak and Bandi which is also the area for mill location.</p> <p>Kemaman POM does not have a copy of land title by itself but is located within Pelantoh Estate that has legal ownership of the land and is an Operating Unit of TDM Plantation Sdn. Bhd. within Mukim Tebak; Lot/PT # L.O.28 land area as per records of Official Search Acknowledgement by Land Office.</p> <p>Tebak Estate total land title 6 as per summary of Land Title sighted as following:</p> <ul style="list-style-type: none"> - Title # 18274; Lot # 2514; Area 218.2 ha; District: Kemaman; Sub-District: Mukim Tebak - Title # HSD 2872; PT # PT 402; Area 198.191 ha; District: Kemaman; Sub-District: Mukim Tebak - Title # HSD 1779; PT # PT 1666; Area 3,861.1 ha; District: Kemaman; Sub-District: Mukim Tebak <p>Pelantoh Estate total land title 13 as per summary of Land Title sighted as following:</p> <ul style="list-style-type: none"> - Title # HSD 9198; Lot # 28; Area 3,439.831 ha; District: Kemaman; Sub-District: Mukim Bandi - Title # 12509; Lot # 821; Area 34.450 ha; District: Kemaman; Sub-District: Mukim Bandi <p>Title # 12756; Lot # 2523; Area 114,400.300 m²; District: Kemaman; Sub-District: Mukim Tebak</p>	
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4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes.	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes.	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication,	Complied

		consultation and complaints from stakeholders as well as boundaries disputes.	
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>In order to deal with future arising land dispute (if applicable), the established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes.</p>	Complied
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>In order to deal with future arising land dispute (if applicable), the established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes.</p>	Complied
4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>In order to deal with future arising land dispute (if applicable), the established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes.</p>	Complied
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>In order to deal with future arising land dispute (if applicable), the established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for</p>	Complied

		External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes.	
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	Documents showing identification and assessment of demonstrable legal, customary and user rights are available as per sample land titles sighted in indicator 4.4.1 above.	Complied
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the SOU Kemaman. The estate lands are legally owned by TDM. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the SOU Kemaman. The estate lands are legally owned by TDM. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the SOU Kemaman. The estate lands are legally owned by TDM. The existing estates are not encumbered	Complied

	- Minor compliance -	by any legal, customary and user rights. Land titles and ownerships of the lands were available.	
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 -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the SOU Kemaman. The estate lands are legally owned by TDM. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.6	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 -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the SOU Kemaman. The estate lands are legally owned by TDM. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the SOU Kemaman. The estate lands are legally owned by TDM. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the SOU Kemaman. The estate lands are legally owned by TDM. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			

4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	There is no customary rights within SOU Kemaman. Land belonged to TDM since the first planting year.	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	There is no customary rights within SOU Kemaman. Land belonged to TDM since the first planting year.	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>	There is no customary rights within SOU Kemaman. Land belonged to TDM since the first planting year.	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>	There is no customary rights within SOU Kemaman. Land belonged to TDM since the first planting year.	Complied
<p>Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	TDM has established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes. Compensation procedure has been clearly stated in the procedure as well.	Complied
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p>	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied

	- Critical (Major) compliance -		
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	TDM has established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes. Compensation procedure has been clearly stated in the procedure as well.	Complied
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	<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>	TDM has established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes. Compensation procedure has been clearly stated in the procedure as well.	Complied
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	TDM has established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes. Compensation procedure has been clearly stated in the procedure as well.	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 -	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and previous FFB prices available as per MPOB Daily FFB Reference Price Summary by Region. The mill received FFB from sister estate from SOU Kemaman and FFB diversion from another certified Group mill. The FFB supplier were listed in the Kemaman POM FFB Supplier list.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	The mill received FFB from sister estate from SOU Kemaman and FFB diversion from another certified Group mill. The FFB supplier were listed in the Kemaman POM FFB Supplier list.	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	The mill received FFB from sister estate from SOU Kemaman and FFB diversion from another certified Group mill. The FFB supplier were listed in the Kemaman POM FFB Supplier list.	Complied
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	The mill received FFB from sister estate from SOU Kemaman and FFB diversion from another certified Group mill. The FFB supplier were listed in the Kemaman POM FFB Supplier list.	Complied

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5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	The mill received FFB from sister estate from SOU Kemaman and FFB diversion from another certified Group mill. The FFB supplier were listed in the Kemaman POM FFB Supplier list.	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Payment made within 30 days upon receipt of supplier's. Payment was made through the financial department at head office. Sampled payment sighted as per sample payment for contractors and suppliers on 27/8/2020 as following: - Westari Corporation Sdn. Bhd.; Invoice date: Jan 2021; Payment voucher # PV0772 - Ainmanna Enterprise; Invoice date: Apr 2021; Payment voucher # PV2297	Complied
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Kemaman POM verified its weighing equipment as per mandatory requirements of Weights and Measures Act 1972 as per latest records of stamping by Metrology Corporation Malaysia Sdn. Bhd. as following: - Weighbridge stamp form # B596773; Equipment Serial # 78J300000V4C00; Model: 60,000 kg Mettler Toledo; Calibration date: 20/9/2021 - Weighbridge stamp form # B596701; Serial # B847813392; Model: 80,000 kg; Calibration date: 15/3/2021	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	No independent smallholders within Kemaman POM certification unit.	Complied

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5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>TDM has established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes. Compensation procedure has been clearly stated in the procedure as well. No independent smallholders within Kemaman POM certification unit.</p>	Complied
<p>Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
5.2.1	<p>The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>Kemaman POM processed own crops only and no FFB sourced from third party. All FFB sent to Kemaman POM are from own supply base. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p>	Complied
5.2.2	<p>The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).</p> <p>- Minor compliance -</p>	<p>Kemaman POM processed own crops only and no FFB sourced from third party. All FFB sent to Kemaman POM are from own supply base. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p>	Complied
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>Kemaman POM processed own crops only and no FFB sourced from third party. All FFB sent to Kemaman POM are from own supply base. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p>	Complied
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>Kemaman POM processed own crops only and no FFB sourced from third party. All FFB sent to Kemaman POM are from own supply base. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p>	Complied

5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>Kemaman POM processed own crops only and no FFB sourced from third party. All FFB sent to Kemaman POM are from own supply base. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p>	Complied
<p>Principle 6: Respect workers' rights and conditions</p>			
<p>Criterion 6.1: Any form of discrimination is prohibited.</p>			
6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>Kemaman POM has the implemented TDM's Human Rights Policy; Signed by Haji Mohd. Ghazali Bon Yahaya; Chief Executive Officer (CEO); Dated on 1/4/2021 where they committed to recognizing the role of Human Rights Defenders in accordance with the United Nations Guiding Principles On Business And Human Rights as well as convention standards of International Labour Organization and local acts. The management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.</p> <p>Policy was communicated and briefed to all workers in order for them to understand their responsibility in respect of human rights and displayed on strategic locations within all Kemaman POM operating units.</p>	Complied
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Migrant workers are recruited with (2 +1) and 3 years contract. Local workers are on a long-term employment. Not any kind of discrimination was noted. Job opportunities and amenities such as free housing, subsidized water and electric supplier (connect to national water and electricity supply) and medical care (panel clinic) are given to all employees without discrimination.</p>	Complied

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		<p>Foreign migrant workers. Refer to Letter of Employment, Employment Contract para" 14 – Annual leave: 14 days for < 5 years and 16 days for > 5 years.</p> <p>Overtime paid as per Employment Act 1995 (EA). Sampled workers are as 6.5.1.</p>	
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>There is not any discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting.</p> <p>Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste as per sample new recruitment sighted.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>There is no pregnancy test conducted in Kemaman POM and estates as a discriminatory measure unless to protect pregnant women employee from being exposed to hazardous work including chemical handling. Voluntary pregnancy test conducted upon request by women employee as per sample sighted for Pelantoh Estate Monthly Pregnancy Test (UPT) latest conducted on date: 22/9/2021.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Based on Gender Policy; Approved & Signed by Haji Mohd. Ghozali Nin Yahaya; CEO TDM Plantation Sdn. Bhd.; Date: 1/4/2021, sighted sample Kemaman POM Gender Committee Meeting 002-2021; Date: 14/10/2021; Gender Committee Chairperson: Puan Hafizah Binti Buredah; Chief Clerk as per appointment letter dated 31/12/2020 for specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p>	<p>There is no any discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based</p>	Complied

	<p>- Minor compliance -</p>	<p>on skills, capabilities, and medical fitness necessary etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting.</p> <p>Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste as per sample sighted as following:</p> <p>Kemaman POM:</p> <ul style="list-style-type: none"> - Employee # KM00050; Post: Process Shift Worker; Male - Employee # KM00052; Post: Process Shift Worker; Male - Employee # KM0900141; Post: General Worker; Female - Employee # KM1800217; Post: Workshop Fitter; Male - Employee # KM0900147; Post: Security Guard; Male - Employee # KM0900139; Post: Lab Worker; Female - Employee # KM00093; Post: Organic Fertilizer Worker; Female <p>Pelantoh Estate:</p> <ul style="list-style-type: none"> - Employee # PT2103444; Post: General Worker - Field; Male - Employee # PT00115; Post: General Worker – Field; Female - Employee # PT1701140; Post: General Worker – Admin; Female - Employee # PT1701278; Post: General Worker – Field; Male - Employee # PT1601076; Post: General Worker – Field; Male - Employee # PT1400877; Post: Harvester; Male - Employee # PT1400911; Post: General Worker – Field; Male - Employee # PT1701287; Post: Harvester; Male - Employee # PT1701130; Post: Harvester; Male - Employee # PT1701143; Post: Harvester; Male 	
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		<p>Pelantoh Estate:</p> <ul style="list-style-type: none"> - Employee # TB00079; Post: General Worker - Field; Female - Employee # TB00204; Post: Creche Ayah; Female - Employee # TB1200654; Post: General Worker – Field; Female - Employee # TB2001244; Post: General Worker - Field; Male - Employee # TB2101310; Post: General Worker - Field; Male - Employee # TB1801090; Post: General Worker – Field; Male - Employee # TB1801142; Post: Piece Rate Worker; Male - Employee # TB1400811; Post: General Worker – Field; Male - Employee # TB1500937; Post: Piece Rate Worker; Male - Employee # TB2001230; Post: Harvester; Male 	
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
<p>6.2.1</p>	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -</p>	<p>All the workers are under direct employment and some contractor workers. The pay slip has included basic income, allowance pay, working days, medical leave, deduction of salary and etc. as per employment contract in compliance with latest MAPA Circular No. 56/2021; Date: 23/8/2021; Oil Palm MAPA/NUPW on the Wages of Harvesters, Harvesting Kanganies, Loaders and "Other Loaders on Oil Palm Estates, 2019; Wage Rate September 2021 & Palm Oil Mill MAPA/NUPW Palm Oil Mill Employees Agreement, 2019; Wage Rates – September 2021</p>	<p>Complied</p>
<p>6.2.2</p>	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for</p>	<p>Employment contracts and related documents detailing payments and conditions of employment including regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity</p>	<p>Complied</p>

	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. - Critical (Major) compliance -	leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements sighted available for workers sample as per indicator 6.1.6 above.	
6.2.3	(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. - Critical (Major) compliance -	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 as per sample workers sighted in indicator 6.1.6 above.	Complied
6.2.4	(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure. - Critical (Major) compliance -	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 connected with the national infrastructure facilities. The use of electricity and water is provided with subsidize rate as per employment contract. Seen the Budget for housing repairs, sanitation, garden upkeep and CAPEX from all operating units. Seen the record for weekly linesite inspection done by Medical Assisant in Weekly basis. 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). During the field assessment, it was observed that the housing area in favourable sanitation condition as reflected in the line-site inspection for sample total new house unit approved Pelantoh Estate: 8 Latest housing inspection date: 13/10/2021, previous inspection date: 6/10/2021	Complied

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		Tebak Estate latest housing inspection date: 14/10/2021	
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>The housing area were located near the main road where the accessibility to the grocery and shops is available in housing area as efforts to improve workers' access to adequate, sufficient and affordable food as per Perjanjian Kantin Kilang Sawit Kemaman; Date 20/4/2021 between Puan Rohayu Binti Ismail with Kemaman Palm Oil Mill; Period: 24/4/2021 to 31/12/2021 with 1+1+1 year subjected to terms and conditions including:</p> <ul style="list-style-type: none"> - (4) 6-monthly evaluation of food hygiene, price and menu (6) Any food menu/price need written permission from management 	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><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</p>	<p>SOU Kemaman conducted the Prevailing Wage Assessment and calculated individual local and foreign workers current salary including non-monetary benefit given average for local worker as per TDM SOU Kemaman Prevailing Wage Assessment (RM); Total received per month = RM 2,157.00. The assessment conducted by Sustainability Team of TDM.</p>	Complied

	<p>other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage). The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>There are no casual workers hired in mill and estates within SOU Kemaman. All employees are permanent employee (for locals) and contracted employee (for foreign workers). All permanent and full time employment or contract workers used as the general worker, mandore, staff, etc. based on sample workers employment contract sighted in indicator 6.1.6 above.</p>	Complied

<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The Social Policy signed by Haji Mohd. Ghazali Bin Yahaya; Chief Executive Officer (CEO) on 1/4/2021 stated that TDM committed to comply with principles as following:</p> <ul style="list-style-type: none"> - Fair treatment to everyone without discrimination - Freedom of association to everyone - Strongly opposed force labour and child labor <p>Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively.</p> <p>During the interview with workers, there are no evidence received that there are restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA 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>Minutes of meetings between the units of certification with trade unions as per sample sighted for the latest employee representative meeting as per Minutes of Meeting Co-operative Board Council; 2nd Session 2020/2021; Date: 7/4/2021.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Based on the worker's interview, the selection of NUPW representative made from the election among the NUPW member without management interference. Foreign workers included in the committee formation and appointment letter sighted. The selection also based on the election meeting.</p>	Complied
<p>Criterion 6.4: Children are not employed or exploited.</p>			

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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 Social Policy signed by Haji Mohd. Ghazali Bin Yahaya; Chief Executive Officer (CEO) on 1/4/2021 stated that TDM committed to comply with principles as following:</p> <ul style="list-style-type: none"> - Fair treatment to everyone without discrimination - Freedom of association to everyone - Strongly opposed force labour and child labor <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 has been included in either contract agreements of purchase orders issued to them.</p>	Complied
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The Social Policy signed by Haji Mohd. Ghazali Bin Yahaya; Chief Executive Officer (CEO) on 1/4/2021 stated that TDM committed to comply with principles as following:</p> <ul style="list-style-type: none"> - Fair treatment to everyone without discrimination - Freedom of association to everyone - Strongly opposed force labour and child labor <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 has been included in either contract agreements of purchase orders issued to them.</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>TDM Plantation Sdn Bhd has developed Child Protection Policy dated 1/4/2021 which signed by CEO. The company will not recruit or exploit any individual less than 16 years old to work in the company. Seen the employee master list confirmed that all the workers were above 18 years old. Besides, interviewed with workers and stakeholders confirmed that TDM Plantation Sdn Bhd did not recruit any workers less than 18 years old.</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>TDM Plantation Sdn Bhd has developed Child Protection Policy dated 1/4/2021 which signed by CEO. The company will not recruit or exploit any individual less than 16 years old to work in the company. Seen the employee master list confirmed that all the workers were above 18 years old. Besides, interviewed with workers and stakeholders confirmed that TDM Plantation Sdn Bhd did not recruit any workers less than 18 years old.</p>	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Kemaman POM has the implemented TDM's Human Rights Policy; Signed by Haji Mohd. Ghozali Bon Yahaya; Chief Executive Officer (CEO); Dated on 1/4/2021 where the management is committed to contributing to a better society.</p> <p>TDM also has established flowchart for handling Sexual Harassment complaint in workplace. The management is required to investigate within 2 days from the date of receiving the complaints. This is demonstrated by the certification unit where no harassment or violence occurred or reported by the workers.</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Kemaman POM has the implemented TDM's Reproductive Policy; Signed by Haji Mohd. Ghozali Bon Yahaya; Chief Executive Officer (CEO); Dated on 1/4/2021 where the management is committed respect the reproductive rights of all especially women.</p>	Complied
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>New mothers assessment were conducted mainly to determine their needs for proper action to be taken by management including allowing time for breastfeeding and/or other motherly needs.</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>Gender committee has been formed in each unit for the medium of sexual harassment grievances by female.</p>	Complied

	- Minor compliance -		
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees. Contract substitution Involuntary overtime Lack of freedom of workers to resign Penalty for termination of employment Debt bondage Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Kemaman POM has the implemented TDM’s Human Rights Policy; Signed by Haji Mohd. Ghozali Bon Yahaya; Chief Executive Officer (CEO); Dated on 1/4/2021 where they committed to recognizing the role of Human Rights Defenders in accordance with the United Nations Guiding Principles on Business and Human Rights as well as convention standards of International Labour Organization and local acts.</p> <p>Policy was communicated and briefed to all workers in order for them to understand their responsibility in respect of human rights and displayed on strategic locations within all Kemaman POM operating units. Interview conducted with both local and foreign workers confirmed that no force labour employment within TDM.</p>	Complied
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>There are no casual or temporary workers hired in mill and estates within SOU Kemaman. All employees are permanent employee (for locals) and contracted employee (for foreign workers). All permanent and full time employment or contract workers used as the general worker, mandore, staff, etc. based on their employment contract sighted in indicator 6.1.6 above.</p>	Complied
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The mill and estates manager has been appointed as person responsible for safety and health cum chairman for safety and health committee in as per appointment letter signed by the CEO.</p> <p>The estates and mill management has established Safety Committee Member consist of Secretary, representatives from</p>	Complied

		<p>Employer and representatives from Employee as per appointment letter signed by the /mill Estate Manager</p> <p>The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on matters arising, OSH objective and program, compliance to legal and requirement, Accident statistic and report, external and internal compliant, training and competency, workplace inspection report and other matters.</p> <p>Kemaman POM</p> <p>Sighted minutes meeting conducted on 21/03/2021 and 23/09/2021 Pelantoh Estate</p> <p>Sighted minutes meeting conducted on 18/03/2021 and 08/06/2021.</p> <p>Tebak Estate</p> <p>Sighted minutes meeting conducted on 18/03/2021 and 22/09/2021</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>TDM Plantations has established the SOP for Accident and emergency procedures documented in the Standard Operating Procedure – Emergency Preparedness and Response edition TDM/01, rev. no. TDMP-02/2018 dated 01/01/2018. In the SOP, the emergency plan and ERT to be activated according to the emergency situations as follows:</p> <ul style="list-style-type: none"> i. Fig. 4.0 – Event of environmental and OSH emergencies including accident/incident ii. Fig. 4.4a – Event of fire iii. Fig. 4.4b – Event of Explosion iv. Fig. 4.4c – Event of Oil Spillage v. Fig. 4.4d – Event of Effluent Spillage (mills). 	<p>Non-compliance</p>

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		<p>The Emergency Response Plan Flow Chart has been displayed at strategic places in the mill and estates.</p> <p>The mill and estates visited has established Emergency response team. Training has been conducted regularly to ensure the awareness on the ERP. Reviewed the training records as follows as per indicator 3.7.2</p> <p>The operating units maintain the records of accidents including JKPP 6 forms reported to DOE, medical leaves certificates, accidents investigations reports and HIRARC review. The accidents occurrence were reported to the Headquarters through Immediate Notification Records and Detail Investigation Reports and DOSH by submitting the JKPP 6 form through MyKKP system.</p> <p>The mill and estates provided first aid kit/box and located in designated places or assigned to competent first aider. The operating units has also has established an information on the location of first aid box, name and contact no. of the assigned first aider and communicated through briefing, training and displayed on notice board. First aid kit was monitored on timely basis as follows:</p> <table border="1" data-bbox="1137 975 1926 1190"> <tr> <td>Kemaman POM</td> <td>16/10/2021</td> <td>16/09/2021</td> <td>25/08/2021</td> </tr> <tr> <td>Pelantoh Estate</td> <td>17/08/2021</td> <td>14/09/2021</td> <td>17 – 18/10/2021</td> </tr> <tr> <td>Tebak Estate</td> <td>12/09/2021</td> <td>30/08/2021</td> <td>25/07/2021</td> </tr> </table> <p>The mill and estate continuously provided training to ensure the competency for the first aider. Sighted the training records as per indicator 3.7.2.</p>	Kemaman POM	16/10/2021	16/09/2021	25/08/2021	Pelantoh Estate	17/08/2021	14/09/2021	17 – 18/10/2021	Tebak Estate	12/09/2021	30/08/2021	25/07/2021	
Kemaman POM	16/10/2021	16/09/2021	25/08/2021												
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		<p>Noted during site visit at the operating units, the item in the first aid box were inadequate as per listed in the First Aid Item List as follows:</p> <p>Kemaman POM at FFB Ramp: Cotton and medicated oil Pelantoh Estate at Harvesting Operation: Drop eye wash</p>	
<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The management provide appropriate PPE to the employee's base on the job type. The PPE given as per HIRARC and Standard Operating Procedure. PPE issuance was recorded in 'Borang Penyerahan Peralatan kerja dan Pengambilan Barang' and 'Rekod Pengambilan PPE'. Reviewed the PPE issuance records for employees as follows:</p> <p>Kemaman POM</p> <p>Noted during interview at the loading ramp, workshop, boiler and laboratory, the workers were provided with adequate PPE. Sighted the PPE issuance records for workers as follows:</p> <ol style="list-style-type: none"> 1. KM00075 2. KM1400200 3. KM00083 4. KM0900145 5. KM0900146 <p>Noted during site visit at the mill loading ramp, sighted the lorry drivers from estate (Air Putih Estate and Pelantoh Estate) was not wearing safety helmet or appropriate safety equipment when opening the FFB loading BIN and when climbing the lorry to open safety net.</p> <p>Pelantoh Estate</p>	<p>Non-compliance</p>

		<p>Noted during the site visit at spraying gang at field 20C1, the sprayers was provided with hat, safety google, cotton gloves, nitrile gloves, 3M mask, apron, and wellington boots. Reviewed the issuance records as follows:</p> <ol style="list-style-type: none"> 1. Pt00000174 2. Pt02003421 3. Pt08000339 <p>Tebak Estate</p> <p>Noted during the interview with sprayers, they was provided with hat, safety google, cotton gloves, nitrile gloves, 3M mask, apron, and wellington boots. Reviewed the issuance records as follows:</p> <ol style="list-style-type: none"> 1. TB1500929 2. TB1300750 3. TB1901118 4. TB1600974 	
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees. Reviewed on workers profile records found that all workers are covered by the accident insurances.</p> <p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Reviewed the form 8A, "Jadual Caruman" for July, August and September 2021 for contribution of all employees including staff.</p> <p>For local workers, they were also covered with Employment Insurance Scheme. Reviewed the SIP form, ""Jadual Caruman" for July, August and September 2021 for contribution of all employees including staff.</p>	Complied

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		<p>For accident eligible for SOCSO claim, the management submitted application letter with all relevant document to SOCSO. Reviewed document submission for accident as follows:</p> <ol style="list-style-type: none"> 1. Accident occur at Kemaman POM dated 21/09/2021 as per application letter dated 10/10/2021. Refer letter no. KPOM/SOCSO/008/2021. 													
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Records of all accidents are kept. 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. Sighted the samples of accident statistic FY 2020 as reported to DOSH as follows:</p> <table border="1"> <thead> <tr> <th>Operating units</th> <th>Accident Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Kemaman POM</td> <td>2</td> <td>24</td> </tr> <tr> <td>Pelantoh Estate</td> <td>1</td> <td>4</td> </tr> <tr> <td>Tebak Estate</td> <td>1</td> <td>22</td> </tr> </tbody> </table>	Operating units	Accident Cases	LTA	Kemaman POM	2	24	Pelantoh Estate	1	4	Tebak Estate	1	22	Complied
Operating units	Accident Cases	LTA													
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<p>Principle 7: Protect, conserve and enhance ecosystems and the environment</p>															
<p>Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>															
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>The SOU Estates continued to monitor the Implementation of Integrated Pest Management (IPM) plans.</p> <ol style="list-style-type: none"> a) The estates had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, 	Complied												

		<p>physical/mechanical and use of pesticides. The plan was guided by SOPs ref O8.08 dated July 2019.</p> <p>b) In order to minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as <i>Turnera subulata</i>, <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>, along the roadsides and designated points in the fields and also within the nursery perimeter. To develop beneficial plant nursery comprised of the beneficial plant.</p> <p>c) The plan also advocated single layer EFB mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and diseases had been continued. These monthly detection and observations were carried by staff.</p> <p>d) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year where recommended by the PA /Agronomist. Baiting are continued until bait acceptance threshold level</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>This is not practiced in the 2 estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There was no land preparation in SOU Kemaman by burning ever since TDM practiced zero burning as per the policy in:</p> <p>a) TDM P01-SOP-Section 01/2011 - Under felling/clearing & land preparation</p> <p>b) Carbon Policy</p> <p>TDM has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded,</p>	Complied

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		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.																															
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																																	
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>TDM Plantation has established the Agrochemical Management Policy dated 1/7/2020 signed by the CEO.</p> <p>The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Standard Operating Procedure A12: Weeding –Immature, A13 – Mature, A14 – Lallang Eradication, rev. 2, May 2017.</p>	Complied																														
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate.</p> <p>Sighted the sampled records of pesticides usage per ha at estates visited FY 2021 as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Pelantoh</th> <th>Tebak</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>0.04</td> <td>0.06</td> </tr> <tr> <td>Feb</td> <td>0.12</td> <td>0.23</td> </tr> <tr> <td>Mar</td> <td>0.06</td> <td>0.32</td> </tr> <tr> <td>Apr</td> <td>0.04</td> <td>0.28</td> </tr> <tr> <td>May</td> <td>0.05</td> <td>0.23</td> </tr> <tr> <td>Jun</td> <td>0.07</td> <td>0.22</td> </tr> <tr> <td>Jul</td> <td>0.07</td> <td>0.27</td> </tr> <tr> <td>Aug</td> <td>0.04</td> <td>0.12</td> </tr> <tr> <td>Sep</td> <td>0.07</td> <td>0.14</td> </tr> </tbody> </table>	Month	Pelantoh	Tebak	Jan	0.04	0.06	Feb	0.12	0.23	Mar	0.06	0.32	Apr	0.04	0.28	May	0.05	0.23	Jun	0.07	0.22	Jul	0.07	0.27	Aug	0.04	0.12	Sep	0.07	0.14	Complied
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7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Standard Operating Procedure A12: Weeding –Immature, A13 – Mature, A14 – Lallang Eradication, rev. 2, May 2017.</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -</p>	<p>No evidence of prophylactic use of pesticides in the estates visited as per Register of Chemicals Hazardous to Health for all estates visited.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. - Minor compliance -</p>	<p>All estates has established Register of Chemicals Hazardous to Health. No class 1A and 1B were used in the estates. Only class II, III & IV chemical used at visited estates. Sighted and verified at all estates visited, Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. As for usage of highly toxic/limited pesticides, the estates acquired permit from Department of Agriculture.</p>	Complied
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p>	<p>The pesticides operators have been given training regarding the usage safety and health issue and proper way for chemical application. Sighted the sampled training records as follows: Pelantoh Estate</p>	Complied

	- Critical (Major) compliance -	<ol style="list-style-type: none"> Scheduled waste management and use and standard exposure of chemicals hazardous to health training dated 19/01/2021 <p>Tebak Estate</p> <ol style="list-style-type: none"> Alion usage and spraying SOP training dated 14/06/2021 Spraying training by Macrotech Solution Sdn. Bhd. dated 16/03/2021 	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Empty Pesticides Containers were triple rinse and reuse back as pre-mix chemical container. The estate maintain the inventory records of empty pesticides containers recorded in Scheduled Record Book and reported to DOE through ESWISS. The empty containers was disposed as Scheduled waste. Reviewed the latest disposal records as follows:</p> <p>Pelantoh Estate 21/09/2021 as per consignment note no. 2021092115X2QIU6.</p> <p>Tebak Estate 10/10/2021 as per consignment note no. 2021102216OUT2N9</p>	Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	No evidence of aerial spray conducted at the estate visited.	Complied

<p>7.2.10</p>	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -</p>	<p>The estates conducted medical surveillance for sprayers on annually basis as per recommendation in the CHRA. Additionally, the estates conducted medical screening done by Medical Assistant and checked by the VMO on monthly basis. Reviewed the medical surveillance and screening records as follows: Pelantoh Estate</p> <ol style="list-style-type: none"> 1. The estate conducted medical surveillance for sprayers on annually basis. Latest medical surveillance was conducted on 03/02/2021. Total of 20 workers were sent for surveillance and 1 was found unfit to work with pesticides. JKPP 7 was submitted to DOSH on 13/02/2021. The involved workers was changed to other job as per letter dated 18/02/2021. 2. The estate conducted medical screening for the sprayers on monthly basis. reviewed the screening records dated 07/09/2021, 25/08/2021, 06/06/2021 and 18/04/2021 <p>Tebak Estate</p> <ol style="list-style-type: none"> 1. The estate conducted medical surveillance as per recommendation by CHRA on annually basis. Latest medical surveillance was conducted 01/02/2021. Total of 23 workers were send for surveillance and found fit to work as chemical handlers. 2. The estate conducted medical screening for sprayers on monthly basis. Reviewed the screening reports dated 06/10/2021, 15/09/2021, 29/08/2021 and 18/07/2021. 	<p>Complied</p>
<p>7.2.11</p>	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. - Critical (Major) compliance -</p>	<p>The estates visited has issued Internal Memorandum on prohibition of pregnant or breastfeeding women or other people that have medical restrictions to work as pesticides operator.</p>	<p>Complied</p>

		<p>The memorandum has been displayed at several information board in the estate and communicated to the workers during training and morning briefing.</p> <p>Noted during interview with the female workers, the understanding on the prohibition pregnant or breastfeeding women to work as chemical handlers is acceptable.</p>																
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>																		
<p>7.3.1</p>	<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>Kemaman Mill and the 2 estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2021 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1137 837 1921 1157"> <thead> <tr> <th></th> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>Land</td> <td>Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.</td> </tr> </tbody> </table> <p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2021. The waste generated from the mill/estates operations as shown below:</p> <table border="1" data-bbox="1164 1348 1921 1380"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> </tbody> </table>		Receptor	Sources	1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG	2	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	Land	Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.		Type of waste	Details	<p>Complied</p>
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2	Odor & gases	Activities from the effluent treatment																						
3	Leakage of lubricant	Storage & vehicle maintenance																						
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Kemaman POM and the estates in the CU, procedure TDM Section B Ref no 89 – Scheduled Wastes (Hazardous Waste) Management has been established.</p> <p>a) Waste Management Plan 2021 has been established in Jan 2021.</p> <p>b) Based on Environmental Impact Evaluation and Environment Aspect and Impact Identification improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination.</p> <p>c) 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.</p> <p>d) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The Mill/Estates scheduled waste are disposed to licensed</p>	Complied																					

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contractor M/s Pentas Flora (Kelantan) Sdn Bhd registration no 004878 valid effective 21/01/20. SW404 is despatched to Edgenta Mediserve Sdn Bhd located in Kamunting Raya Perak below; prior delivery was in Jan 2021 due to MCO operational restriction in the receiving plant and deliveries. The delay was communicated via letter dated 09/6/2021 to DOE, hence resulting in deferment of 180 days max storage.

Estate/ Mill	Date	SW 312	SW 410	SW 404	SW 305	SW 409	SW 322
Pelantoh	21/9/21	0.400	0.06		0	0.35	0
Pelantoh	23/3/21	0	0	0.006	0	0	0
Tebak	10/10/21	0	0	0	0	0.09	0
Tebak	23/3/21	0	0	0.008	0	0	0
kemama n Pom	05/9/21	0	0.10	0	0.80	0.07	0.02

Domestic waste for the operating units in SOU was disposed internally as follows;

Unit	Disposal site	Remarks
Kemaman Pom	P92B1	Collection 2/3 x week
Tebak	P95A	Collection 2/3 x week
Pelantoh	P92B1	Collection 2/3 x week

7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>There was no land preparation in SOU Kemaman Estates by burning ever since TDM practiced zero burning as per the Environmental policy in:</p> <ul style="list-style-type: none"> c) Under felling/clearing & land preparation d) Carbon Policy <p>TDM has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>SOU Kemaman continued to use and implement SOP for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOP were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOP.</p> <ul style="list-style-type: none"> a) Standard Operating Procedures (SOP) 2011 b) "Guidelines On River Management" c) Pictorial Safety Standards and Security Guidelines (PSS). d) Laboratory Process Control Manual e) Security Guidelines f) SOP - Manuring 14 pages Rev 2017 <p>All the estates and mill operations were guided through the manuals and SOP. The procedures as documented in the manual and SOP were disseminated to the staff/workers through morning briefings and training. The Manuals are kept in the main office for references</p>	Complied

		<p>of employees particularly for the supervisory personnel. The SOP included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.</p>																					
<p>7.4.2</p>	<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. The agronomic assessment and fertilizer recommendation was conducted by AAD (Agronomy and Advisory Dept of Head Office to formulate the FY2021 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca & B had been were carried out in all estates. The latest being :</p> <table border="1" data-bbox="1249 1042 1879 1177"> <thead> <tr> <th></th> <th><i>Estate</i></th> <th><i>Report Date</i></th> <th><i>Report No</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pelantoh</td> <td>2019</td> <td>LE-1906/0805</td> </tr> <tr> <td>2</td> <td>Tebak</td> <td>26/7/21</td> <td>TO 04/8/21</td> </tr> </tbody> </table> <p>Soil analysis for PH, Org C, Total N, Total P, Avail P, Exch K, Exch Ca & Exch Mg was carried out on a year cycle in batches basis with latest made on the following date:</p> <table border="1" data-bbox="1249 1339 1879 1370"> <thead> <tr> <th></th> <th><i>Estate</i></th> <th><i>Report Date</i></th> <th><i>Report No</i></th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		<i>Estate</i>	<i>Report Date</i>	<i>Report No</i>	1	Pelantoh	2019	LE-1906/0805	2	Tebak	26/7/21	TO 04/8/21		<i>Estate</i>	<i>Report Date</i>	<i>Report No</i>					<p>Complied</p>
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		<table border="1" data-bbox="1249 363 1879 461"> <tr> <td>1</td> <td>Pelantoh</td> <td>30/9/2018</td> <td>SE-1810/0421</td> </tr> <tr> <td>2</td> <td>Tebak</td> <td>13/12/20</td> <td>SE-2020/12/30</td> </tr> </table> <p>All foliar and soil sampling & analysis was conducted by UTCL of Mahamurni Plantations Sdn Bhd. Reports were sighted and verified.</p>	1	Pelantoh	30/9/2018	SE-1810/0421	2	Tebak	13/12/20	SE-2020/12/30																												
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<p>7.4.3</p>	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>All the estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of compost. In addition, during replanting, palms were felled, chipped, windowed and left to decompose. Records showed that the estates had applied records of compost (20kg/palm) application in mt in 2020/21 was as follows:</p> <table border="1" data-bbox="1249 874 1839 1201"> <thead> <tr> <th></th> <th><i>Estate</i></th> <th><i>Field no</i></th> <th><i>Ha</i></th> <th><i>Mt</i></th> </tr> </thead> <tbody> <tr> <td></td> <td colspan="4"><i>Compost</i></td> </tr> <tr> <td>1</td> <td>Tebak</td> <td>P20A2</td> <td>124.49</td> <td>1586</td> </tr> <tr> <td>2</td> <td>Tebak</td> <td>P20A1</td> <td>102.80</td> <td>584.51</td> </tr> <tr> <td>3</td> <td>Pelantoh</td> <td>PR19A</td> <td>140.87</td> <td>388.01</td> </tr> <tr> <td>4</td> <td>Pelantoh</td> <td>PR20C</td> <td>212.94</td> <td>620.80</td> </tr> <tr> <td>5</td> <td>Pelantoh</td> <td>PR19B1</td> <td>88.46</td> <td>114.98</td> </tr> </tbody> </table>		<i>Estate</i>	<i>Field no</i>	<i>Ha</i>	<i>Mt</i>		<i>Compost</i>				1	Tebak	P20A2	124.49	1586	2	Tebak	P20A1	102.80	584.51	3	Pelantoh	PR19A	140.87	388.01	4	Pelantoh	PR20C	212.94	620.80	5	Pelantoh	PR19B1	88.46	114.98	<p>Complied</p>
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<p>7.4.4</p>	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilizer application program was monitored using records like program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc. Records of programs and applications of fertilizers were reviewed by auditors. Review of the records</p>	<p>Complied</p>																																			

		<p>revealed that the actual fertilizers applied in 2020/21 was in line with the program. The following fertilizers were applied in the estates on recommendation by the Agronomist.</p> <table border="1" data-bbox="1243 478 1848 933"> <thead> <tr> <th></th> <th><i>Fertiizer</i></th> <th><i>Kg/palm</i></th> <th><i>application month</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>AS-NK1</td> <td>2.50</td> <td>Feb</td> </tr> <tr> <td>2</td> <td>RRP</td> <td>2.00</td> <td>April</td> </tr> <tr> <td>3</td> <td>AS-NK2</td> <td>2.50</td> <td>June</td> </tr> <tr> <td>4</td> <td>AS-NK3</td> <td>2.</td> <td>Sept</td> </tr> <tr> <td>5</td> <td>CPD25</td> <td>1.50</td> <td>Feb/May/July</td> </tr> <tr> <td>6</td> <td>CRF2</td> <td>3.50</td> <td>July / Sept</td> </tr> <tr> <td>7</td> <td>CPD50</td> <td>2.50</td> <td>Feb/July</td> </tr> <tr> <td>8</td> <td>GML</td> <td>2.50</td> <td>Feb/July</td> </tr> <tr> <td>9</td> <td>MOP</td> <td>2.00</td> <td>Mac / Aug</td> </tr> </tbody> </table>		<i>Fertiizer</i>	<i>Kg/palm</i>	<i>application month</i>	1	AS-NK1	2.50	Feb	2	RRP	2.00	April	3	AS-NK2	2.50	June	4	AS-NK3	2.	Sept	5	CPD25	1.50	Feb/May/July	6	CRF2	3.50	July / Sept	7	CPD50	2.50	Feb/July	8	GML	2.50	Feb/July	9	MOP	2.00	Mac / Aug	
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Criterion 7.5: Practices minimise and control erosion and degradation of soils.

7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - 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="1243 1125 1814 1396"> <thead> <tr> <th>No</th> <th></th> <th>Pelantoh</th> <th>Tebak</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bkt Tuku</td> <td>1.12</td> <td>3.57</td> </tr> <tr> <td>2</td> <td>Chempaka</td> <td>0.64</td> <td>0</td> </tr> <tr> <td>3</td> <td>Kuala Brang</td> <td>1.36</td> <td>0</td> </tr> <tr> <td>4</td> <td>Awang</td> <td>0.35</td> <td>1.59</td> </tr> <tr> <td>5</td> <td>Bungor</td> <td>56.07</td> <td>20.82</td> </tr> </tbody> </table>	No		Pelantoh	Tebak	1	Bkt Tuku	1.12	3.57	2	Chempaka	0.64	0	3	Kuala Brang	1.36	0	4	Awang	0.35	1.59	5	Bungor	56.07	20.82	Complied
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7.5.2	<p data-bbox="257 959 1111 1082">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 data-bbox="257 1094 501 1123">- Minor compliance -</p>	<p data-bbox="1137 951 1921 1074">Like all TDM Estates, the 2 estates visited continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ul data-bbox="1149 1094 1928 1187" style="list-style-type: none"> a) Slope & River Protection Policy dated 01/04/2021. b) Buffer Zone & 25-degree slope SOP c) Land Preparation for Terracing in SOP Section 3.5 ref TDMP01 <p data-bbox="1149 1193 1928 1378">It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, compost 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 mucuna bracteata had</p>	Complied																																								

		<p>been planted along some slopes by management. Large areas with neprolepis biserrata in the inter rows were sighted during the visit. The slope maps were provided by the AAD Unit with details as follows:</p> <table border="1" data-bbox="1216 507 1744 676"> <thead> <tr> <th>No</th> <th>Topography</th> <th>Pelantoh</th> <th>Tebak</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0-13</td> <td>58.78</td> <td>34.00</td> </tr> <tr> <td>2</td> <td>14-20</td> <td>11.79</td> <td>50.00</td> </tr> <tr> <td>3</td> <td>21-25 & > 25</td> <td>0.24</td> <td>16</td> </tr> <tr> <td></td> <td>Total</td> <td>100.00</td> <td>100.00</td> </tr> </tbody> </table>	No	Topography	Pelantoh	Tebak	1	0-13	58.78	34.00	2	14-20	11.79	50.00	3	21-25 & > 25	0.24	16		Total	100.00	100.00	
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	Total	100.00	100.00																				
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 July 2020 stating the following among others; "Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly".</p>	Complied																				
<p>Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>																							
7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -</p>	<p>Both soil and topography maps and information are available in the estates. Soil analysis is made on a 5 year cycle. However there is no peat soil or soil categorized as marginal or fragile soil at the estates visited.</p>	Complied																				
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.</p>	Complied																				

7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys were established and available in a soil map at all estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	There is no new planting in both the estates visited. There is no peat soil or soil categorized as marginal or fragile soil all estates visited.	Complied
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	There is no new planting in both the estates visited. There is no peat soil or soil categorized as marginal or fragile soil all estates visited.	Complied
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.	Complied
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	The water and ground cover management programme is documented in the TDM Standard Operating Procedure - Management in Coastal and Peat lands). Details are described in 7.8.1. individual estates and mill had their respective water management plan mainly to monitor among others the following; a) Monitor the quality of main water inlet/outlet for pollutants from estate's operations. b) Water management and drainage system in the fields. c) Contingency during water shortage. d) Monitor the usage of fresh water on monthly basis e) Reuse/recycle waste water.	Complied

7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.	Complied
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.	Complied
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.	Complied

Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.

<p>7.8.1</p>	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <ul style="list-style-type: none"> a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. b) Workers have adequate access to clean water. <p>- Minor compliance -</p>	<p>The SOU Kemaman had established its Water Management Plan for year 2021 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <ul style="list-style-type: none"> a) Implementation of rain water harvest, b) Construction of water gate and scheduled water pumping for effective management of field drains and field water level. c) daily monitoring of bund / scheduled maintenance d) Establishment of <i>mucuna bracteata</i> to prevent erosion, e) Side drain at field road to control water, frond stacking, f) Enhancement of ground vegetation at bare ground area. <p>The water sources are as shown below:</p> <table border="1" data-bbox="1137 804 1921 1337"> <thead> <tr> <th></th> <th>Water sources</th> <th>Usage</th> <th>Monitoring & measurement</th> <th>Freq</th> <th>PIC</th> <th>Review status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SATU</td> <td>Purchased for domestic consumption</td> <td>Monitoring water supply</td> <td>Monthly</td> <td>AM Mgr</td> <td>Liaison with Authority</td> </tr> <tr> <td>2</td> <td>Rain water</td> <td>Domestic use Workshop Chemical mixing</td> <td>Rain fall data</td> <td>Ongoing</td> <td>AM Mgr</td> <td>Water harvesting for general washing</td> </tr> <tr> <td>3</td> <td>Water tank</td> <td>Emergency water supply</td> <td>-</td> <td>-</td> <td>AM Mgr</td> <td>Request water supply from other estates</td> </tr> </tbody> </table> <p>The contingency plan during water shortage</p>		Water sources	Usage	Monitoring & measurement	Freq	PIC	Review status	1	SATU	Purchased for domestic consumption	Monitoring water supply	Monthly	AM Mgr	Liaison with Authority	2	Rain water	Domestic use Workshop Chemical mixing	Rain fall data	Ongoing	AM Mgr	Water harvesting for general washing	3	Water tank	Emergency water supply	-	-	AM Mgr	Request water supply from other estates	<p>Complied</p>
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3	Water tank	Emergency water supply	-	-	AM Mgr	Request water supply from other estates																									

	Area/ incident	Action steps	PIC	Status
1	Water shortage/ prolonged dry season	To obtain water from local authority /estate 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
2	Severe water pollution/ Contamination	To obtain water from local authority 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
<p>The Estates had implemented water managements plans which covered:</p> <ul style="list-style-type: none"> 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. <p>Water management plan review date was sighted and verified with records as follows;</p>				
Estate/Mill		Review date	Issues	

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1	kemaman Pom	07/2/2021	Nil
2	Pelantoh	07/2/2021	Nil
3	Tebak	10/2/2021	Nil

The water reduction plan is shown below;

	Issues/Areas	Action Steps	PIC	Status
1	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	AM/Field staff	On-going
2	Leakage on plumbing system	Frequent inspection to detect leakage Fix any leakage	AM/Field staff	On-going
3	Water compartmentalization	To conserve level of soil moisture To minimize water stress during dry season	AM/Field staff	On-going
4	Handling of chemicals	To recycle water spillage while mixing of chemical at mixing area	AM/Field staff	On-going
5	education	Avoid excessive usage during cleaning Close pipe to prevent water dripping	AM/Field staff	On-going
5	Re-streaming	Re stream from sterilizer condensate pit for dilution	Mill engineer	On-going

The Mill Identification & Management of Waste Water

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		location	Waste water produced	Treatment/containment	Reuse/recycle/disposal method
		1 Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ETP	Recover into system
		2 Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain
		Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain
		3 Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain
		4 Lab	Cleaning water	Process drain	Monsoon drain
		5 Wash room	Toilet water, cleaning water	Septic tank	Collected by licensed contractor.
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>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 TDM policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in TDM Plantation Sdn Bhd revised on 01/02/2020. The buffer zones established are as follows:</p>			Complied

No	River width	Buffer zone
1	> 40 meters	50 meters
2	20 - 40 meters	40 meters
3	10 - 20 meters	20 meters
4	5 - 10 meters	10 meters
5	< 5 meters	5 meters

The signboards were displayed accordingly at the site where applicable. The guideline was issued by the SU. 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:

	Estate	Area	Area
1	Tebak	Sg Tebak	PR19A
2	Tebak	Sg Tebak	P97A1
3	Pelantoh	Sg Tebak p93d	P93D
4	Pelantoh	Sg Tebak PM 92B	PM92B

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. Extracted record of both the estates with details below;

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.

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		<table border="1" data-bbox="1205 384 1863 598"> <thead> <tr> <th></th> <th>Estate</th> <th></th> <th>Point A</th> <th>Point B</th> <th>Point C</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pelantoh</td> <td>P93A1</td> <td>/</td> <td>-</td> <td>-</td> </tr> <tr> <td>2</td> <td>Tebak</td> <td>P93D</td> <td>/</td> <td>-</td> <td>-</td> </tr> <tr> <td>3</td> <td>kemaman Pom</td> <td>compound</td> <td>/</td> <td>/</td> <td>/</td> </tr> </tbody> </table> <p data-bbox="1137 603 1930 667">Water sampling was taken annually to test against the industrial effluent water analysis and pesticide analysis. Among others</p> <table border="1" data-bbox="1198 678 1859 869"> <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="1198 909 1859 1141"> <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> <tr> <td>2</td> <td>Dieldrin</td> <td>0.02 ppb</td> <td>6</td> <td>lindane</td> <td>2 ppb</td> </tr> <tr> <td>3</td> <td>t-DDT</td> <td>0.1 ppb</td> <td>7</td> <td>endosulfan</td> <td>10 ppb</td> </tr> <tr> <td>4</td> <td>BHC</td> <td>2 ppb</td> <td>8</td> <td>Chlordane</td> <td>0.08 ppb</td> </tr> </tbody> </table> <p data-bbox="1137 1149 1478 1177">parameters as shown below:</p> <p data-bbox="1137 1204 1915 1233">There were no issues on the water quality for the sampling points</p>		Estate		Point A	Point B	Point C	1	Pelantoh	P93A1	/	-	-	2	Tebak	P93D	/	-	-	3	kemaman Pom	compound	/	/	/		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	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	
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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>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No over flow was observed, and flow meter reading was recorded daily. The mill monitoring the effluent and submits to</p>	Complied																																																																														

		<p>DOE through 'Borang Penyata Suku Tahunan'. The Mill DOE license was for water discharge with the requirement of BOD less than 100 mg/l. The results from final discharge were compliance within parameter limit. <i>Jadual Pematuhan license no 004055</i> validity period of 01/7/20-30/6/21. July 2021 Mill was under EMCO hence was not in operations</p> <table border="1" data-bbox="1167 619 1877 1038"> <thead> <tr> <th></th> <th>Parameters</th> <th>Std</th> <th>07/7/21</th> <th>30/8/21</th> <th>08/9/21</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>5.0-9.0</td> <td>8.0</td> <td>7.90</td> <td>8.20</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>100</td> <td>0</td> <td>40</td> <td>54</td> </tr> <tr> <td>3</td> <td>COD</td> <td>-</td> <td>0</td> <td>120</td> <td>213</td> </tr> <tr> <td>4</td> <td>Total solids</td> <td>-</td> <td>0</td> <td>2122</td> <td>4700</td> </tr> <tr> <td>5</td> <td>S Solids</td> <td>400</td> <td>0</td> <td>100</td> <td>220</td> </tr> <tr> <td>6</td> <td>Oil & grease</td> <td>50</td> <td>0</td> <td>1</td> <td>10</td> </tr> <tr> <td>7</td> <td>A Nitrogen</td> <td>150</td> <td>0</td> <td>4.93</td> <td>48.61</td> </tr> <tr> <td>8</td> <td>Total N</td> <td>200</td> <td>0</td> <td>6.00</td> <td>54</td> </tr> </tbody> </table>		Parameters	Std	07/7/21	30/8/21	08/9/21	1	PH	5.0-9.0	8.0	7.90	8.20	2	BOD	100	0	40	54	3	COD	-	0	120	213	4	Total solids	-	0	2122	4700	5	S Solids	400	0	100	220	6	Oil & grease	50	0	1	10	7	A Nitrogen	150	0	4.93	48.61	8	Total N	200	0	6.00	54	
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>The water usage for mill is monitored on monthly basis. The average water ratio to FFB in 2020 is shown below. There is no issue encountered by the mill.</p> <table border="1" data-bbox="1205 1174 1796 1380"> <thead> <tr> <th>Month</th> <th>FFB processed</th> <th>Water/L</th> <th>Water/FFB</th> </tr> </thead> <tbody> <tr> <td>Jan 20</td> <td>10148</td> <td>21650</td> <td>2.13</td> </tr> <tr> <td>Feb 20</td> <td>14215</td> <td>30400</td> <td>2.14</td> </tr> <tr> <td>Mac 20</td> <td>19015</td> <td>41250</td> <td>2.17</td> </tr> <tr> <td>April 20</td> <td>20549</td> <td>44250</td> <td>2.15</td> </tr> <tr> <td>May 20</td> <td>15366</td> <td>33650</td> <td>2.19</td> </tr> </tbody> </table>	Month	FFB processed	Water/L	Water/FFB	Jan 20	10148	21650	2.13	Feb 20	14215	30400	2.14	Mac 20	19015	41250	2.17	April 20	20549	44250	2.15	May 20	15366	33650	2.19	Complied																														
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			Jun 20	21885	47550	2.17		
			July 20	20523	44300	2.16		
			Aug 20	22630	50000	2.21		
			Sept 20	21008	46100	2.19		
			Oct 20	20073	43500	2.17		
			Nov 20	19054	28599	1.50		
			Dec 20	16997	36650	2.16		

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

7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2021. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table border="1" data-bbox="1137 798 1915 1324"> <thead> <tr> <th>No</th> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Backhoe, tractor</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>to ensure the vehicle engine is turn off during idle time to record vehicle activity which consume fuel</td> </tr> <tr> <td>2</td> <td>Van / Supervisor y vehicle</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>to record vehicle activity in order to eliminate waste activity which consume fuel. to turn off vehicle engine during idle time.</td> </tr> </tbody> </table>	No	Target	Objective	Action plan	1	Backhoe, tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	to ensure the vehicle engine is turn off during idle time to record vehicle activity which consume fuel	2	Van / Supervisor y 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.	Complied
No	Target	Objective	Action plan												
1	Backhoe, tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	to ensure the vehicle engine is turn off during idle time to record vehicle activity which consume fuel												
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The diesel utilization for the mill and estates is provided in the below table.

<i>Kemaman Mill</i>				
No	Month	FFB processed	Diesel/L	Diesel/FFB
1	Jan 20	10148	18111	1.78
2	Feb 20	14215	20059	1.41
3	Mac 20	19015	20230	1.06
4	April 20	20549	21250	1.03
5	May 20	15366	29920	2.42
6	Jun 20	21885	30180	1.38
7	July 20	20523	20600	1.00
8	Aug 20	22630	24980	1.10
9	Sept 20	21008	22073	1.05
10	Oct 20	20073	24767	1.23
11	Nov 20	19054	14360	0.75
12	Dec 20	16997	18043	1.06

Site	<i>Pelantoh Estate 2020</i>			<i>Tebak Estate 2020</i>		
Mth	FFB mt	Diesel	Diesel/FFB	FFB mt	Diesel L	Diesel /FFB
Jan 20	2456	5296	2.16	2392	6930	2.90
Feb 20	2614	5095	1.95	2580	6872	2.66
Mac 20	3085	4589	1.49	3026	6132	2.03
April 20	3644	5303	1.45	3220	6111	1.90
May 20	2733	3505	1.28	2444	5297	2.17
Jun 20	3499	4248	1.21	3115	6315	2.03
July 20	2693	5547	2.06	2381	6035	2.54

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		<table border="1" data-bbox="1137 363 1921 595"> <tr> <td>Aug 20</td> <td>2339</td> <td>4831</td> <td>2.07</td> <td>2497</td> <td>5730</td> <td>2.30</td> </tr> <tr> <td>Sept 20</td> <td>2202</td> <td>5105</td> <td>2.32</td> <td>2452</td> <td>5512</td> <td>2.25</td> </tr> <tr> <td>Oct 20</td> <td>2056</td> <td>3817</td> <td>1.86</td> <td>2459</td> <td>5627</td> <td>2.29</td> </tr> <tr> <td>Nov 20</td> <td>1962</td> <td>5117</td> <td>2.61</td> <td>2513</td> <td>5982</td> <td>2.38</td> </tr> <tr> <td>Dec 20</td> <td>1902</td> <td>3476</td> <td>1.83</td> <td>2352</td> <td>5767</td> <td>2.45</td> </tr> </table> <p>The estate and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running.</p> <p>Performance variation in view of several factors i.e.</p> <ul style="list-style-type: none"> e) Infrastructure of estates, f) Community size / no of gen-sets, g) No. of vehicles / age of machine. h) Weather interference / crop production volume <p>There is no opportunity for the estates to capitalize the utilization of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p>	Aug 20	2339	4831	2.07	2497	5730	2.30	Sept 20	2202	5105	2.32	2452	5512	2.25	Oct 20	2056	3817	1.86	2459	5627	2.29	Nov 20	1962	5117	2.61	2513	5982	2.38	Dec 20	1902	3476	1.83	2352	5767	2.45	
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<p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>																																						
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill</p>	Complied																																			

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		<p>environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points.</p> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 4.0 which is submitted to the RSPO Secretariat. Based on verification of various record, the data in the RSPO PalmGHG Calculator was correct.</p>	
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	No development within Kemaman POM Certification Unit since 2014.	Complied
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	Significant pollutants identification and plans are documented under Pollution Prevention Plan. Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.	Complied
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>There was no land preparation of existence or new planting in SOU Estates by burning ever since TDM Plantation practiced zero burning as per the policy in:</p> <p style="padding-left: 40px;">a) Under felling/clearing & land preparation b) Carbon Policy</p> <p>TDM has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	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.</p> <p>- Minor compliance -</p>	<p>This is established in the ERP procedure. Therein containing</p> <ul style="list-style-type: none"> a) Objective b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill <p>The procedure was formalised by GSQM for use in all operating units in TDM Estates and mills. Training related to fire drill are conducted annually mill - 20/6/21 & 23/2/21.</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Both the estates and the mill in SOU Kemaman held engagement with the adjacent stakeholders via briefing sessions as stated in ERP procedure <i>Kertas Kerja Program Simulasi Kebakaran</i> dated 19/08/2020 and Fire Prevention and Control Measure. Therein containing</p> <ul style="list-style-type: none"> a) Objective b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill <p>All stakeholders being briefed in the respective stakeholders meetings</p>	Complied
<p>Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>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 HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU Kemaman estates. The audit findings have confirmed that there is no new planting. There were no HCV areas within the situated with the affected areas.</p>	Complied

7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU estates. The recent HCV assessment for the entire SOU Kemaman was performed by SRA Consultancy in Nov 2011. The assessment among others covers the following areas;</p> <p>a) Overview of HCV assessment. b) Description of assessment areas. c) Finding and discussion - landscape context - HCV criteria and application to agriculture d) HCV monitoring and management</p> <table border="1" data-bbox="1167 778 1928 1070"> <thead> <tr> <th></th> <th>HCV</th> <th>Pelantoh</th> <th>Tebak</th> <th>Kemaman Pom</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>HCV 6 Graveyard</td> <td>/</td> <td>-</td> <td>-</td> </tr> <tr> <td>2</td> <td>HCV 4 - Water catchment</td> <td>/</td> <td>-</td> <td>/</td> </tr> <tr> <td>3</td> <td>HCV 4 Sg Tebak</td> <td>-</td> <td>/</td> <td>-</td> </tr> <tr> <td>4</td> <td>Slope area 78.79 ha</td> <td>-</td> <td>/</td> <td>-</td> </tr> <tr> <td>5</td> <td>Abandoned area</td> <td>-</td> <td>/</td> <td>-</td> </tr> <tr> <td>6</td> <td>Effluent pond</td> <td>-</td> <td>-</td> <td>/</td> </tr> </tbody> </table>		HCV	Pelantoh	Tebak	Kemaman Pom	1	HCV 6 Graveyard	/	-	-	2	HCV 4 - Water catchment	/	-	/	3	HCV 4 Sg Tebak	-	/	-	4	Slope area 78.79 ha	-	/	-	5	Abandoned area	-	/	-	6	Effluent pond	-	-	/	Complied
	HCV	Pelantoh	Tebak	Kemaman Pom																																		
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6	Effluent pond	-	-	/																																		
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	NA	Not Applicable																																			
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly</p>	<p>There was no land preparation of existence or new planting in SOU Estates by burning ever since TDM Plantation practiced zero burning as per the policy in:</p> <p>c) Under felling/clearing & land preparation d) Carbon Policy</p> <p>TDM has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded,</p>	Complied																																			

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	<p>managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>There was no rights of local communities been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas. The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird, presence of wild boar, elephants and monkeys occasionally sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan reviewed in Jan 2021.</p>	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU estates (refer 7.3.1 to 7.4.2).</p>	Complied
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>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 estates (refer 7.3.1 to 7.4.2). Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PA/GM and also personnel from the Sustainability unit. Sighting of RTE are made and recorded during the AP rounds in the estates if any.</p>	Complied

7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU Kemaman estates (refer 7.3.1 to 7.4.2).</p>	Complied
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in [2020] for [TDM Kemaman Palm Oil Mill] and supply base was calculated using the PalmGHG Calculator version 4. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in [2020] for [TDM Kemaman Palm Oil Mill] and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.16
PKO	1.16

Extraction	%
OER	20.04
KER	4.58

Production	t/yr
FFB Process	221466.08
CPO Produced	44372.04
PKO Produced	0.00

Land Use	Ha
OP Planted Area	20819.37
OP Planted on peat	0.00
Conservation (forested)	65.46
Conservation (non-forested)	194.64
Total	21079.47

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	139061.94	0.63	0.00	0.00	12191.12	0.00	151253.06	0.68
CO ₂ Emission from fertilizer	11318.96	0.05	0.00	0.00	1650.50	0.00	12969.46	0.06
NO ₂ Emission	7620.78	0.03	0.00	0.00	1188.76	0.00	8809.54	0.04
Fuel Consumption	1876.16	0.01	0.00	0.00	113.32	0.00	1989.49	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-101963.08	-0.46	0.00	0.00	-10732.75	0.00	-112695.83	-0.51
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	57914.77	2.97	0.00	0.00	4410.94	0.00	62325.71	0.28

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0.00	0.00
Fuel Consumption	825.47	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	825.47	0.00

Summary of Kernel Crusher Emission and Credit (if applicable)

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

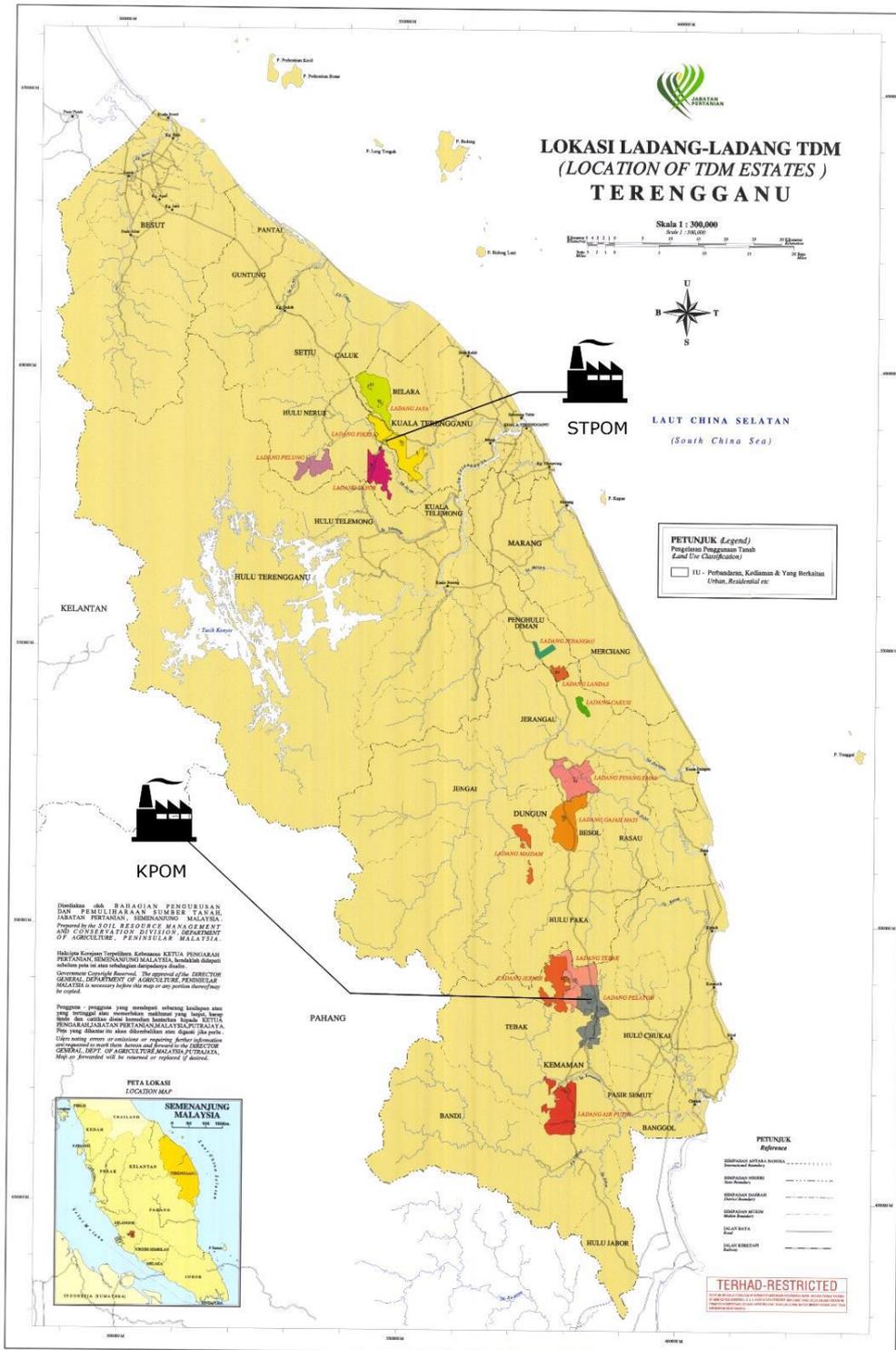
*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	10
Divert to anaerobic diversion (%)	90

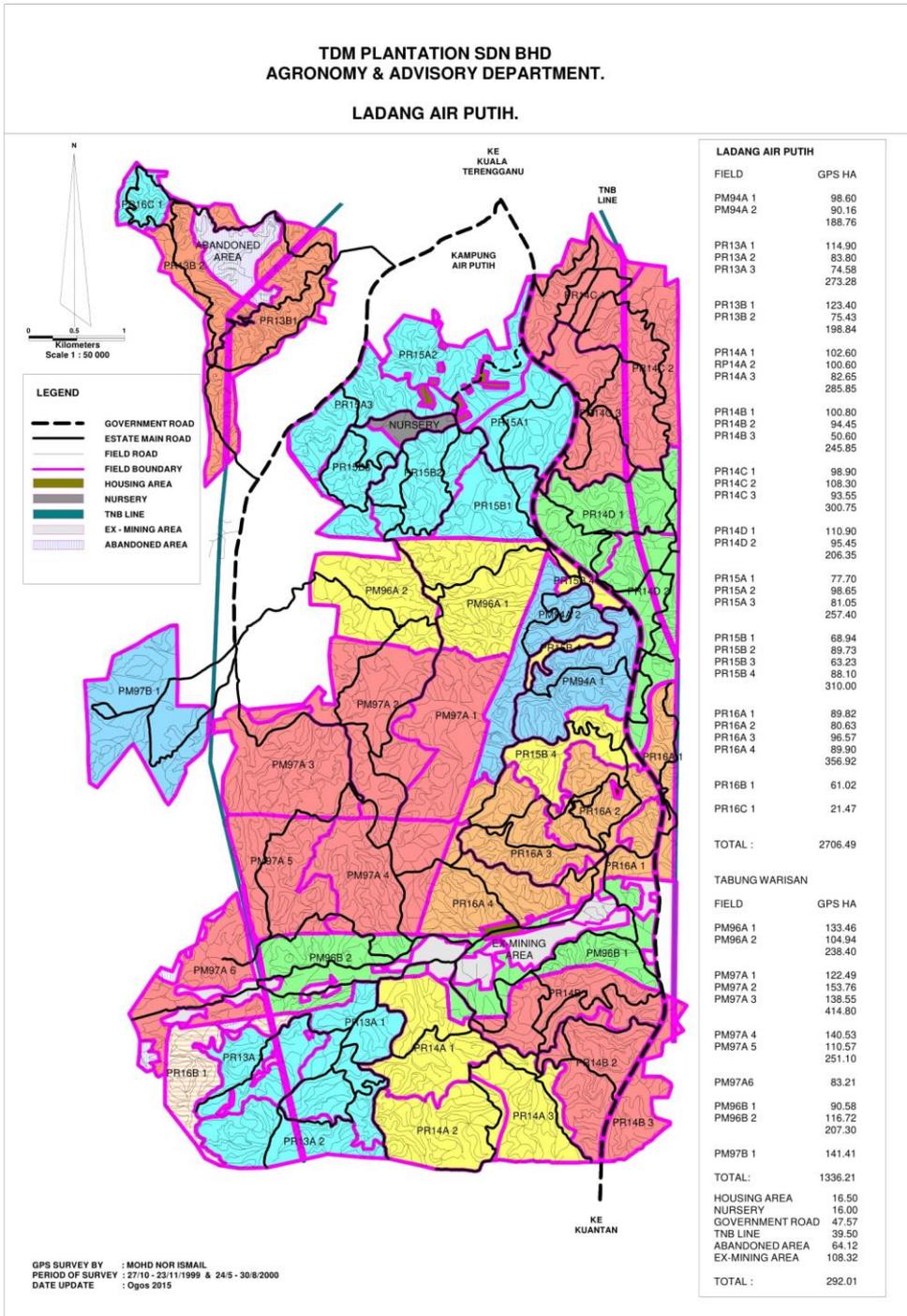
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

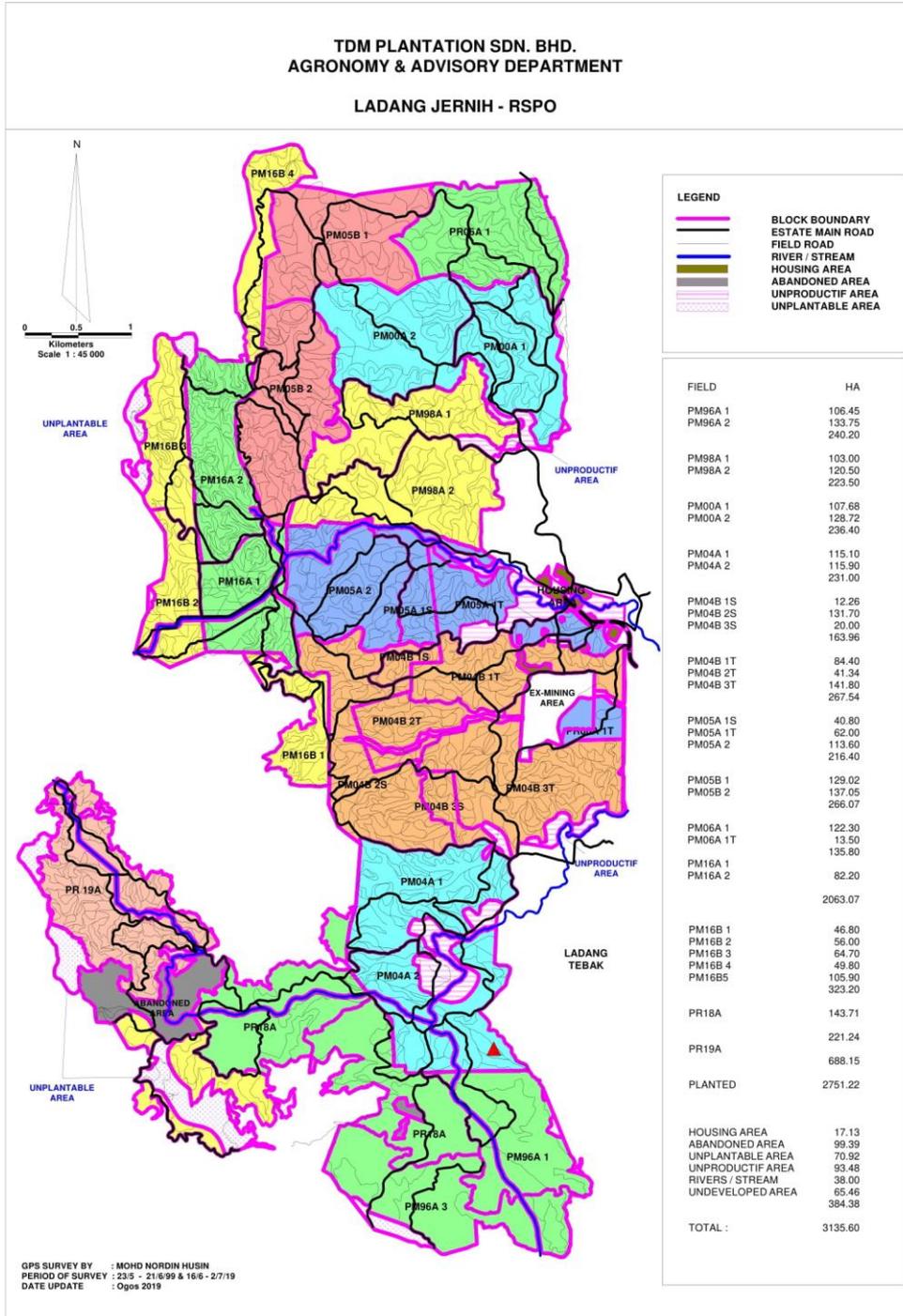
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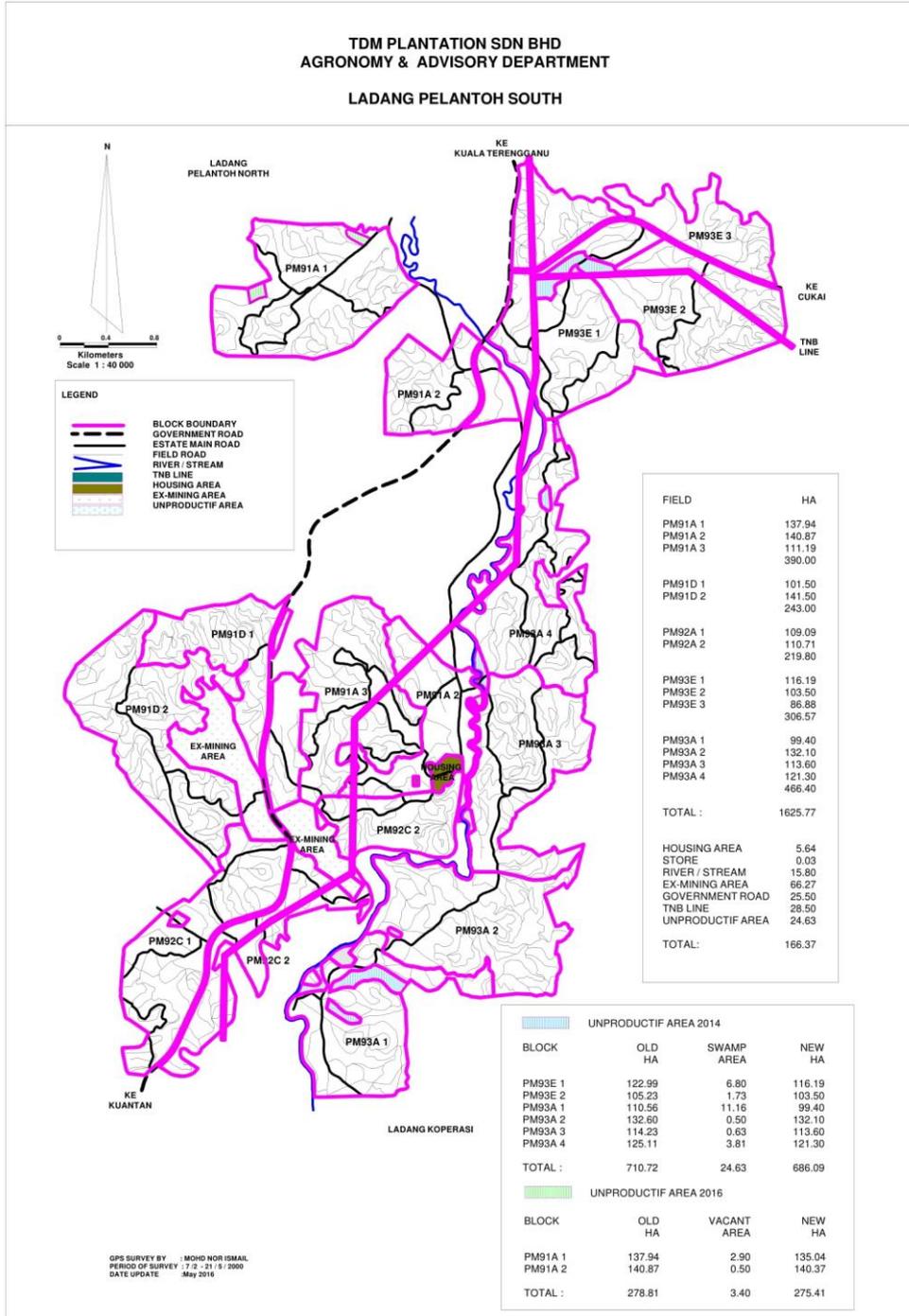
Appendix C: Location Map of Certification Unit and Supply bases

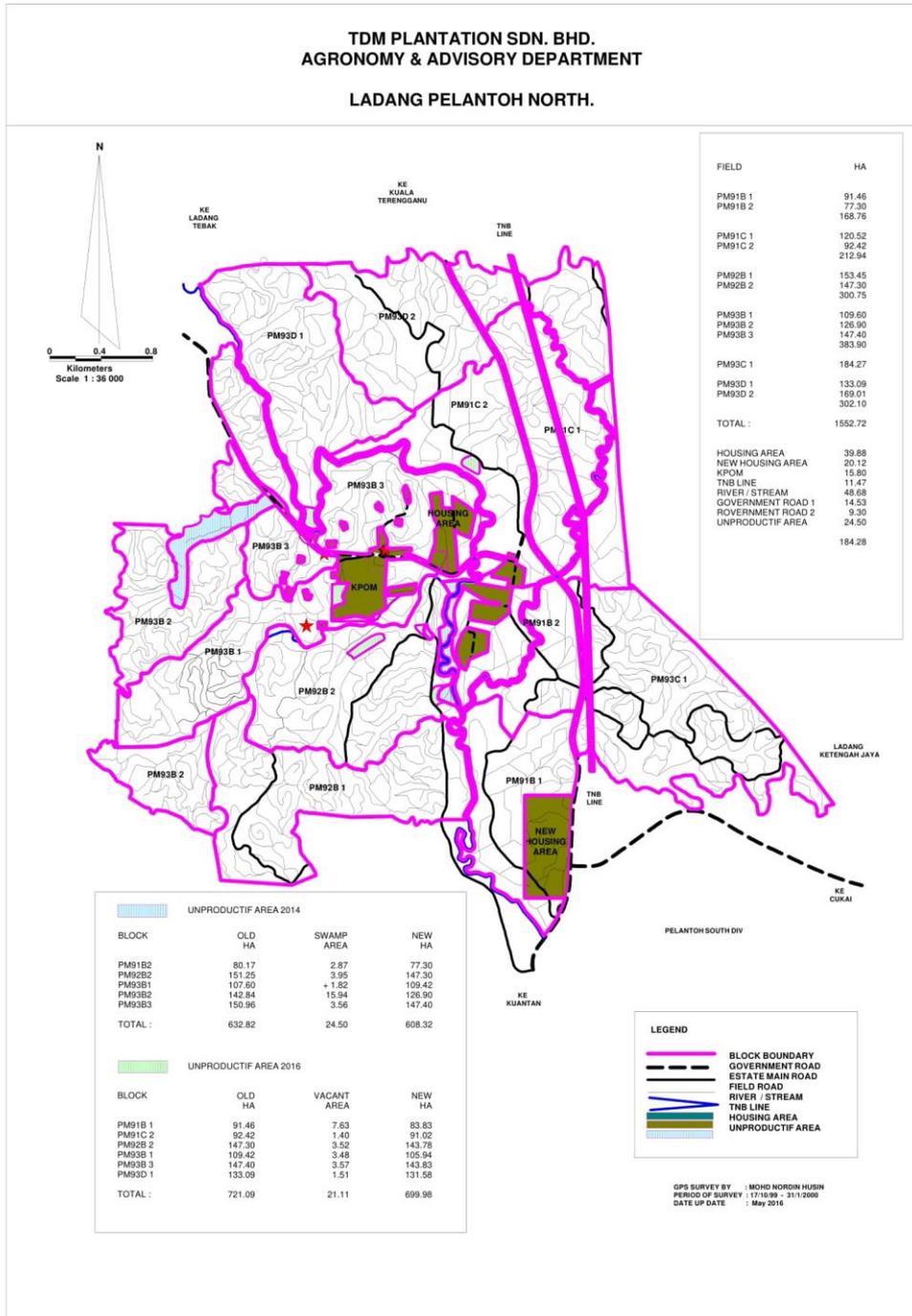


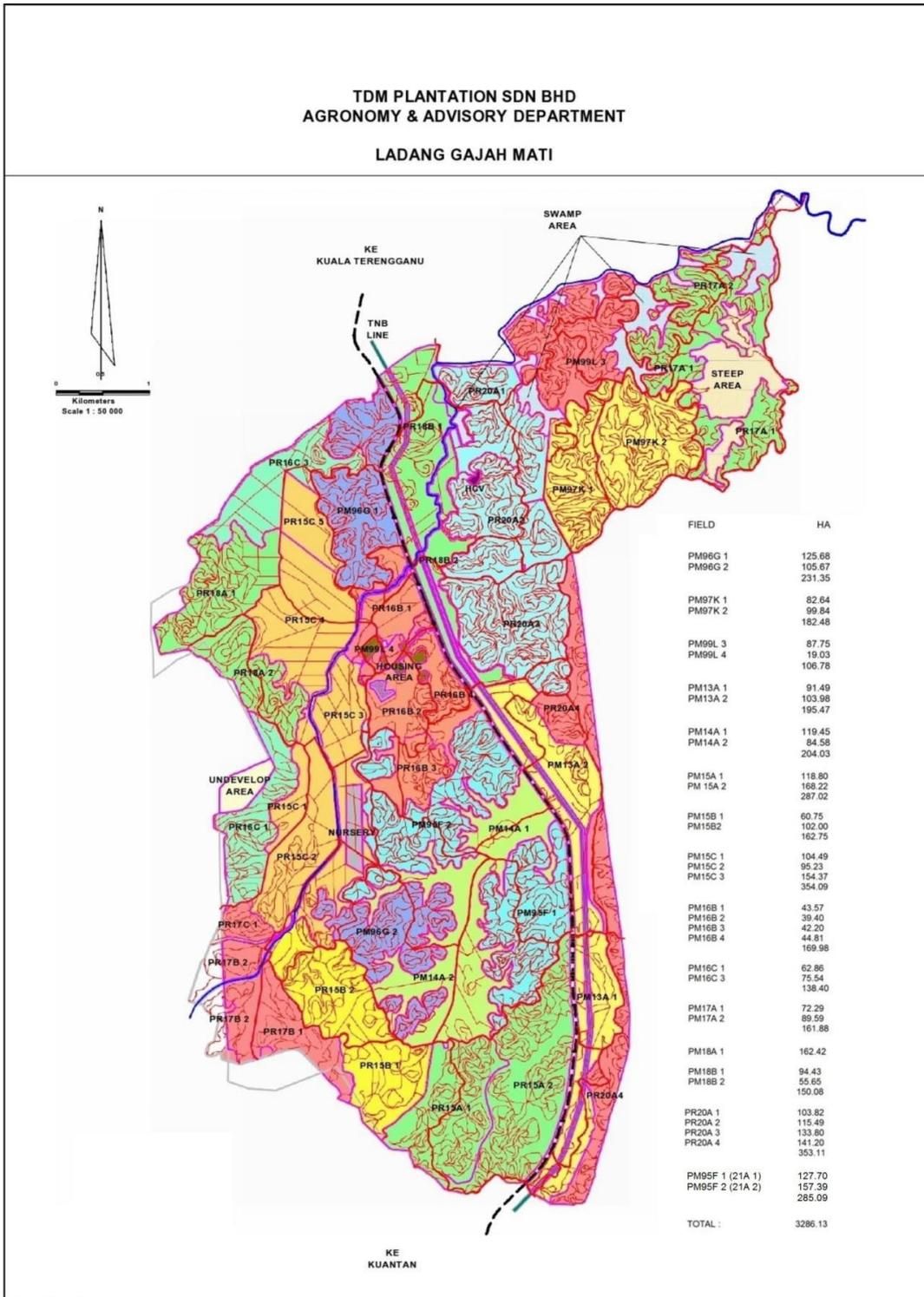
Appendix D: Estate Field Map

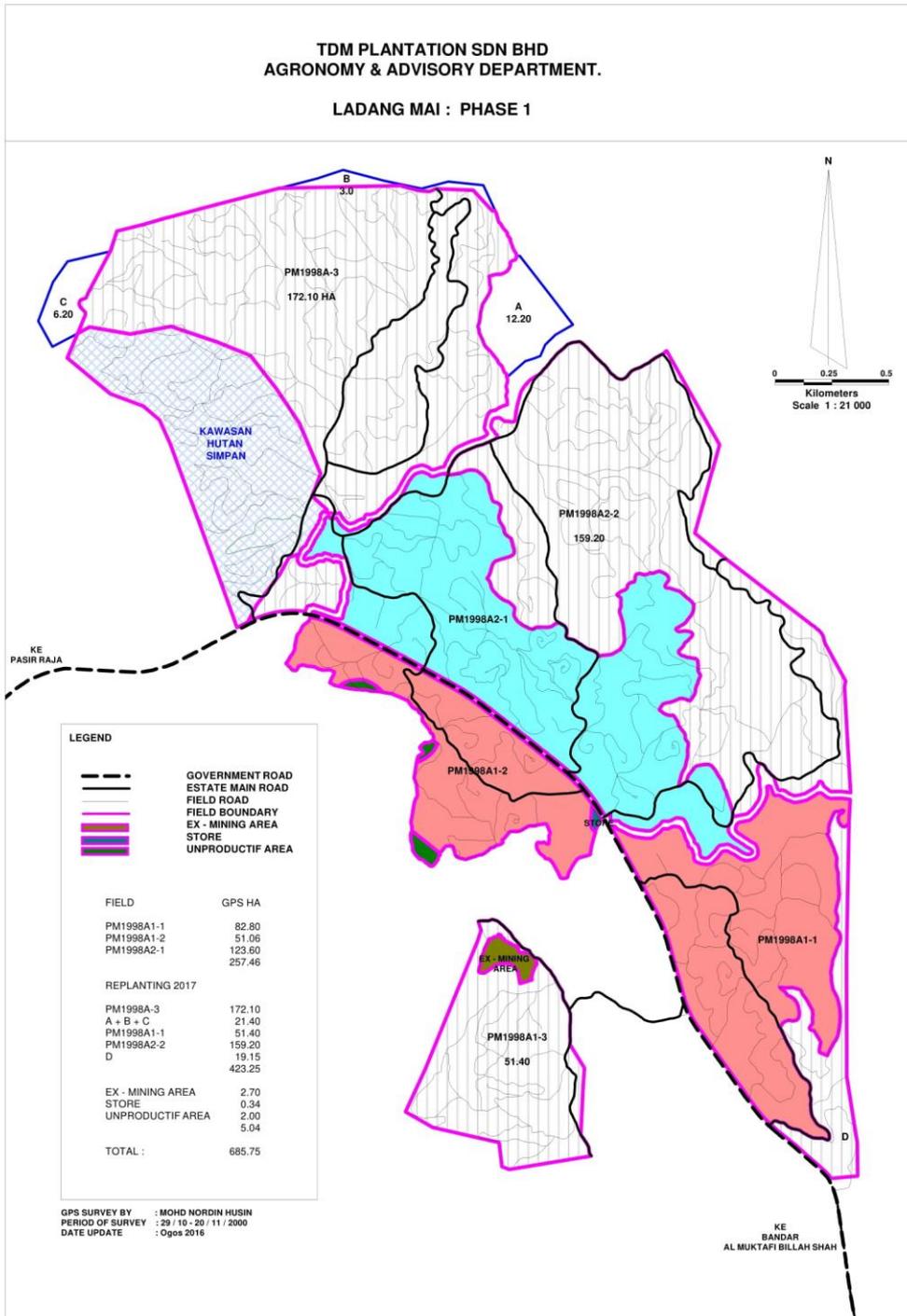


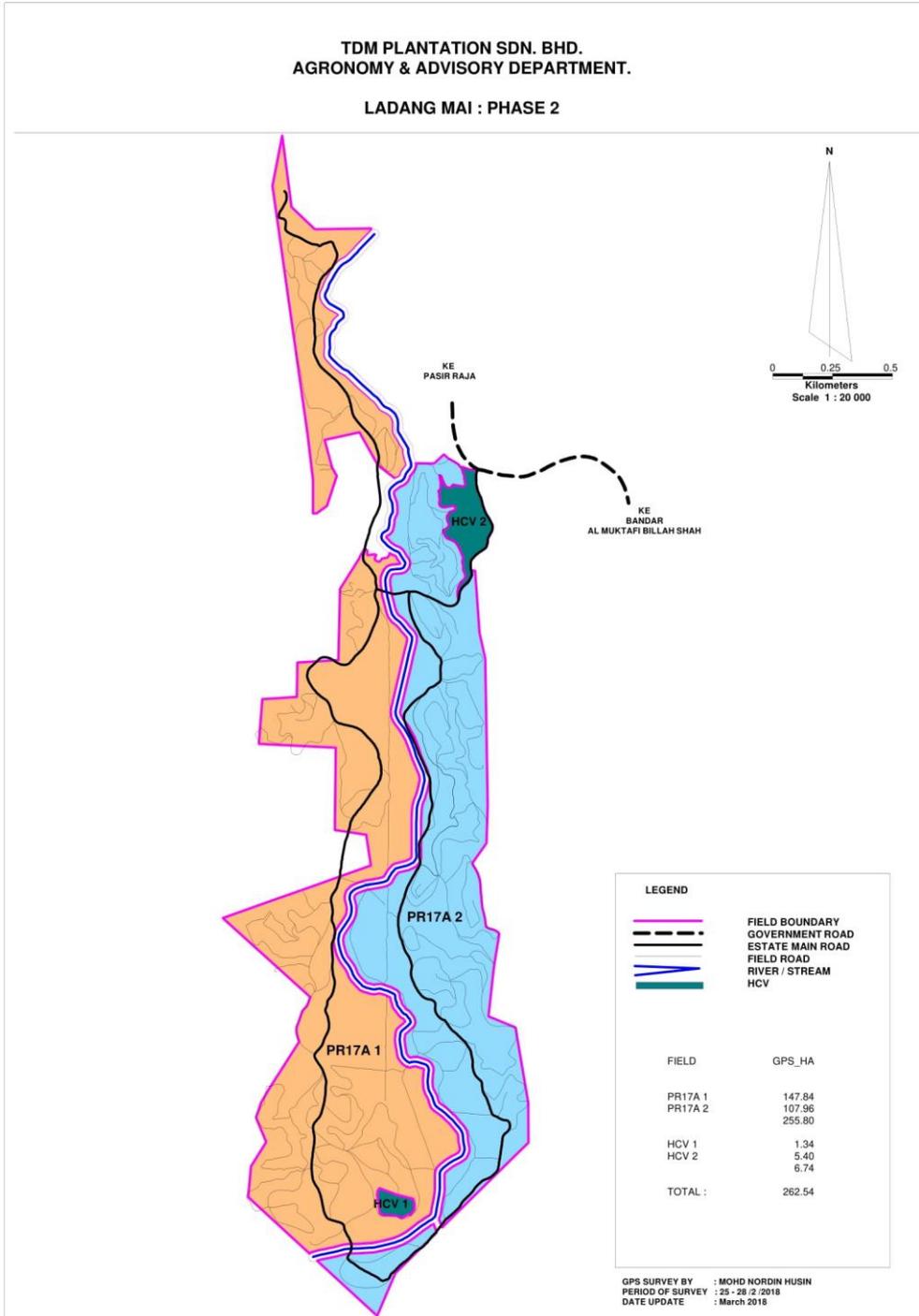


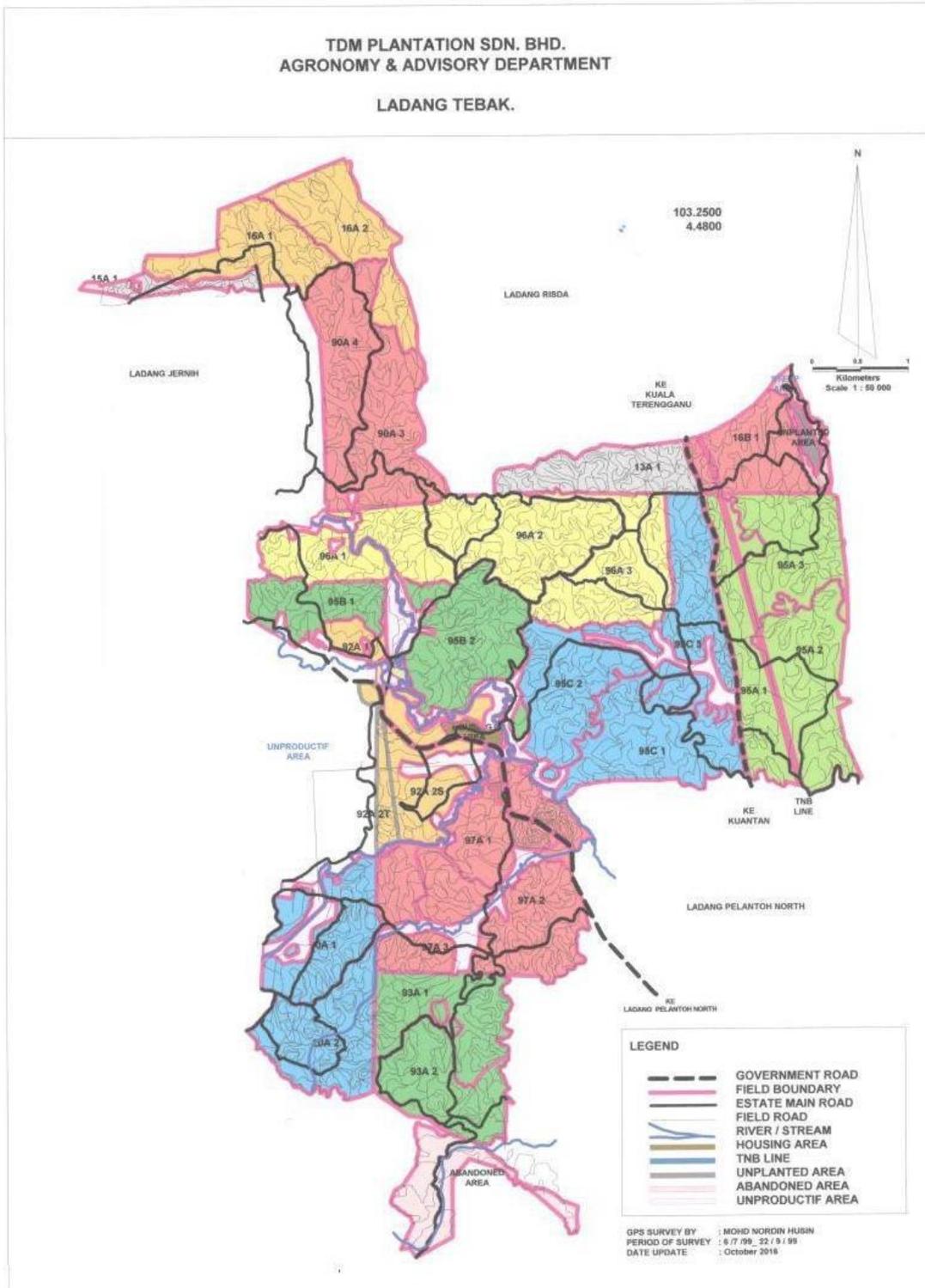












Appendix F: List of Abbreviations

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