

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

Client Company Name / Parent Company: Sime Darby Plantation Berhad
Client Company / Parent Company Address: Level 3A, Main Block, Plantation Tower 2, Jalan PJU 1A/7, 47301 Ara Damansara, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 11)- Kerdu Palm Oil Mill
Location of Certification Unit: Lot 575, Mukim Kerdu, 28010 Temerloh, Pahang, Malaysia
Date of Final Report: 20/08/2022

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Sime Darby Plantation Berhad		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	07/09/2004
Address	Level 3A, Main Block, Plantation Tower 2, Jalan PJU 1A/7, 47301 Ara Damansara, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 11) – Kerdu Palm Oil Mill		
Location / Address	Lot 575, Mukim Kerdu, 28010 Temerloh, Pahang, Malaysia		
Website	www.simedarbyplantation.com		
Management Representative	Shylaja Devi Vasudevan Nair	E-mail	shylaja.vasudevan@simedarbyplantation.com
Telephone	603-78484379	Facsimile	+603 7848 4363

2. Certification Information			
Certificate Number	RSPO 745399	Certificate Start Date	07/07/2021
Date of First Certification	07/07/2011	Certificate Expiry Date	06/07/2026
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	The objective of the assessment was to conduct an annual assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by Kerdu POM and Supply Base's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60mt/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 745400	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services (M) Sdn Bhd	20/12/2022
MSPO 745401	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3	BSI Services (M) Sdn Bhd	20/12/2022
MSPO 745402	MSPO Supply Chain Certification 2018	BSI Services (M) Sdn Bhd	24/10/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Kerdau Palm Oil Mill	Lot 575, Mukim Kerdau, 28010 Temerloh, Pahang, Malaysia	3° 34' 11.36" N	102° 16' 49.68" E
Kerdau Estate	Ladang Kerdau, 28010 Temerloh, Pahang Darul Makmur, Malaysia	3° 34' 11.24" N	102° 18' 35.76" E
Mentakab Estate	Ladang Mentakab/ Lanchang/ Edensor, c/o Lanchang Division, 28500 Lanchang, Pahang Darul Makmur, Malaysia	3° 28' 39.33" N	102° 10' 56.62" E
Sg Mai Estate	Ladang Sungai Mai, 27000 Jerantut, Pahang Darul Makmur, Malaysia	3° 48' 30.55" N	102° 21' 24.09" E
Chenor Estate	Ladang Chenor (KT), Sungai Jerik, 26400 Bandar Pusat Jengka, Pahang Darul Makmur, Malaysia	3° 47' 13.68" N	102° 38' 28.69" 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
Kerdau Estate	5,123.78	67.42	491.84	5,683.04	90.16
Mentakab Estate	2,934.92	31.70	299.87	3,266.49	89.85
Sg Mai Estate	2596.90	50.70	187.38	2834.98	91.60
Chenor Estate	1,862.69	7.82	126.48	1,996.99	93.27
Total	12,518.29	157.64	1,105.57	13,781.50	90.83

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6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Kerdau Estate	125.88	4,352.91	644.99	0.00	4,997.90	125.88
Mentakab Estate	390.00	1,410.45	1,112.35	22.12	2,544.92	390.00
Sg Mai Estate	471.67	854.76	936.86	333.61	2,125.23	471.67
Chenor Estate	269.39	1,261.64	331.66	0.00	1,593.30	269.39
Total (ha)	1,256.94	7,879.76	3,025.86	355.73	11,261.4	1,256.94

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (July 2021 – June 2022)	Actual (Apr 2021 – Mar 2022)		Forecast (July 2022- June 2023)
		Previous license period (Apr 21-Jun 21)	Current license period (Jul 21-Mar 22)	
Kerdau Estate	95,855.84	26,429.30	45,334.52	68,136.88
Mentakab Estate	46,494.42	15,708.35	26,168.74	43,018.20
Sg Mai Estate	40,399.84	11,382.00	19,600.71	43,553.50
Chenor Estate	23,164.00	7,175.91	17,087.93	30,176.55
Total	205,914.10	168,887.46		184,885.13

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (July 2021 – June 2022)	Actual (Apr 2021 – Mar 2022)		Forecast (July 2022- June 2023)
		Previous license period (Apr 21-Jun 21)	Current license period (Jul 21-Mar 22)	
Jabor		635.36	13,740.24	
Bk Puteri Estate		0	1,127.12	
Total		15,502.72		

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (July 2021 – June 2022)	Actual (Apr 2021 – Mar 2022)		Forecast (July 2022- June 2023)
		Previous license period (Apr 21-Jun 21)	Current license period (Jul 21-Mar 22)	
AAA		4,466.21	14,720.00	
Total		19,186.21		

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Apr 2021	16,488.63	927.21	17,415.84
2	May 2021	15,715.27	947.76	16,663.03
3	June 2021	16,916.72	1,262.26	18,178.98
4	July 2021	17,728.07	1,735.00	19,463.07
5	Aug 2021	18,879.93	2,584.72	21,464.65
6	Sept 2021	12,389.12	1,065.82	13,454.94
7	Oct 2021	18,830.17	1,931.82	20,761.99
8	Nov 2021	19,148.52	2,270.43	21,418.95
9	Dec 2021	14,854.27	738.64	15,592.91
10	Jan 2022	11,245.06	594.79	11,839.85
11	Feb 2022	10,217.71	1,125.67	11,343.38
12	Mar 2022	11,976.71	4,002.09	15,978.80
	TOTAL	184,390.18	19,186.21	203,576.39

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (July 2021 – June 2022)	Actual (Apr 2021 – Mar 2022)		Forecast (July 2022- June 2023)
	Previous license period (Apr21-June21)	Current license period (July21-March22)	
FFB	FFB		FFB
206,315.90 mt	61,330.92 mt	123,059.26 mt	184,885.13 mt
	TOTAL	184,390.18 mt	
CPO (OER: 20.50 %)	CPO (OER: 20.38 %)		CPO (OER: 20.50 %)
42,294.76 mt	13,623.76 mt	23,954.95 mt	37,901.45 mt

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	TOTAL	37,578.71 mt		
PK (KER: 4.50 %)	PK (KER: 4.59%)			PK (KER: 4.50 %)
9,266.13 mt	3,068.35 mt	5,395.15 mt	8,319.83 mt	
	TOTAL	8,463.50 mt		

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Apr 2021	3,360.38	756.83
2	May 2021	3,202.76	721.32
3	June 2021	3,447.63	776.48
4	July 2021	3,612.98	813.72
5	Aug 2021	3,847.73	866.59
6	Sept 2021	2524.90	568.66
7	Oct 2021	3,837.59	864.30
8	Nov 2021	3,902.47	878.92
9	Dec 2021	3,027.30	681.81
10	Jan 2022	2,291.74	516.15
11	Feb 2022	2,082.37	468.99
12	Mar 2022	2,440.86	549.73
TOTAL		37,578.71	8,463.50

11. Summary of Actual Volume sold					
Current License period (July21-March22)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	0	0	0	26,794.93	26,794.93*
PK (MT)	4,991.19	0	0	147.78	5,138.97
Credits	0	0	0	0	0
Previous License period (Apr21-June21)					
CPO (MT)	1,737.53	0	0	3,217.07	4,954.60
PK (MT)	2,645.77	0	0	245.36	2,891.13
Credits	0	0	0	0	0
Note:					
Conventional is RSPO certified material but sold as non-RSPO.					
*CPO Opening Stock from previous license period					

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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		TR-34942eb0-35e8 TR-1c348159-6380 TR-eceab8fd-cefd TR-dd6eef79-b75c TR-69b68363-2d67 TR-20f2327a-2241 TR-c2aed2b8-64e4 TR-0d980cc1-2dd6 TR-c92db05c-4f9e TR-470384ba-9b7c TR-6c0e0548-de62 TR-36610e70-8629 TR-d1e24e02-bf4f TR-0588a1bb-bab8 TR-b2e9f2fe-bbf4 TR-3168868a-0b9a TR-2e708fdf-d5c7 TR-18ccc1bf-42ed TR-0856dc4c-ace4 TR-a54728b1-4415 TR-8d4bfeee-7af7 TR-f53957d1-ad51 TR-46b43cbb-218d TR-e9a91ad6-1076 TR-00324570-e8e2 TR-0530ae33-39dd TR-a4dd552a-712d TR-ff495451-1f84 TR-ac1d31b4-7981 TR-23162242-7264 TR-fca93753-4d51 TR-051150e9-5b7d TR-7cd48c33-7370 TR-108fcc73-c5b1 TR-1f1eb27c-fef6 TR-7ab0b40a-5fae TR-3375c7bf-0c1a TR-f7c1f916-8237		7,636.96
	AAA			
2		TR-7b7aa96b-894f TR-8a88b925-6303	1,737.53	
	BBB			

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		TR-2b2257ab-ff5e TR-51b99be3-bd86 TR-8f1f4b12-8544 TR-fa8d9a28-a0f0 TR-76af2c16-2695 TR-c536e26a-f6e0		
TOTAL			1,737.53	7,636.96

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
	Nil			
TOTAL				

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	CCC	30,012.00	0
2	EEE	0	393.14
TOTAL		30,012.00	393.14

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

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Jul 2021 – June 2022)			Actual (Apr 2021 – Mar 2022)			Forecast (Apr 2022 – Mar 2023)		
	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			NA			NA			NA
IS-CSPO	NA	NA		NA	NA		NA	NA	
IS-CSPKO	NA	NA		NA	NA		NA	NA	
IS-CSPKE	NA	NA		NA	NA		NA	NA	
CSPK	NA	NA		NA	NA		NA	NA	

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12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
1	NA	0	0	0	0	0
TOTAL		NA	NA	NA	NA	NA

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (Aug 2021 – Mar 2022)							
Credits				Nil	Nil	Nil	Nil
Physical	Nil	Nil	Nil				
Previous License period (Apr 2021 – Jul 2021)							
Credits				Nil	Nil	Nil	Nil
Physical	Nil	Nil	Nil				

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
	Nil						
TOTAL			NA	NA	NA	NA	NA

Section 2: Assessment Process

Certification Body:

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

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **11-15/4/2022**. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **2/7/2022**. The audit programs are included in Section 2.3.

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

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re- Certification)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Kerdau POM	✓	✓	✓	✓	✓
Kerdau Estate	✓	✓	✓	✓	✓
Sg. Mai Estate	✓	✓	✓	✓	✓
Chenor Estate	✓	✓	✓	✓	✓
Mentakab Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: April 3, 2023 - April 7, 2023

Total Number of Mandays: 15 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Muhamad Naqiuddin Mazeli (MNM)	Team Leader	<p>Education: Holds a Bachelor of Science Horticulture, University Putra Malaysia</p> <p>Work Experience: 11 years working experience in oil palm industry managing sustainability implementation and certification of RSPO P&C, ISCC, and ISO9001 and ISO 18001 for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO and other certifications where applicable to the operations during previous company.</p> <p>Training attended: He has completed ISO 9001: 2015 Lead Auditor Course, ISO 14001: 2015 Lead Auditor Course, ISO 45001: 2018 Lead Auditor Course, HCV & HCS Introductory Training, Endorsed RSPO P&C Lead Auditor Course and Social Auditing & SMETA Training</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, Smallholders inclusion, legal requirements, environment, RSPO supply chain and HCV.</p> <p>Language proficiency: Fluent in English and Bahasa Malaysia</p>
Hafriazhar Mohd Mokhtar (HMM)	Team Member	<p>Education: Holds a Bachelor of Engineering (Hons.) Chemical Engineering, University Technology Malaysia</p> <p>Work Experience: He has 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</p>

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		<p>environments ranging from construction, plantation and mining before auditing. In summary, his started his career as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in palm oil mill, Project Control Engineer (2008-2011) in mining and Auditor (2011-present) with accredited certification bodies.</p> <p>Training attended: He has completed Social Auditing & SMETA Training, HCV & HCS Introductory Training, ISO 45001 LA Training, MSPO LA Training, Endorsed RSPO SCCS LA Training, Endorsed RSPO P&C LA Training, ISO 9001 LA Training, ISO 50001 LA Training, and ISO 14001 LA Training</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of legal, Social and Stakeholder consultation, RSPO Supply chain.</p> <p>Language proficiency: Fluent in English and Bahasa Malaysia</p>
Amir Bahari (AB)	Team Member	<p>Education: Holds a Bachelor of Science (Hons) in Chemistry, University Science Malaysia & a Diploma in Palm Oil Milling Tech/Management, Malaysian Palm Oil Board.</p> <p>Work Experience: He has more than 30 years of plantation experience including managing rubber factories, palm oil mills and estates. Since 2014 he has started auditing professionally for varies scheme including RSPO and MSPO for varies accredited certification body.</p> <p>Training attended: He has completed ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course & Endorsed RSPO P&C Lead Auditor Course.</p> <p>Aspect covered in this audit: During the assessment he covered mills and estates best practices, workers consultation and occupational safety & health.</p> <p>Language proficiency: Fluent in English and Bahasa Malaysia</p>

Accompanying Persons:

Name	Role
Nil	

1.3 Assessment Plan

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

Date	Time	Subjects	MNM	HMM	AB
Sunday, 10/04/2022	PM	Audit Team Travelling to Temerloh	√	√	√
Monday, 11/04/2022 Kerdau Estate	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 	√	√	√
	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	√	√	√

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Date	Time	Subjects	MNM	HMM	AB
		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.	√	√	√
Tuesday, 12/04/2022 Kerdau 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.	√	√	√
Wednesday, 13/04/2022 Mentakab	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	√	√	√

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Date	Time	Subjects	MNM	HMM	AB
estate	09.30 – 12.30	area, Schedule waste management, worker housing, clinic, Landfill etc. 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	√	√	√
	Thursday, 14/04/2021 Chenor 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.	√	√
Thursday, 14/04/2021 Chenor estate	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	√	√	√
	Friday 15/04/2022, Sg Mai 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.	√	√

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Date	Time	Subjects	MNM	HMM	AB
	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	Preparing for closing meeting	√	√	√
	17.00-1730	Closing Meeting	√	√	√
Saturday, 16/04/2022		Audit team travelling to Kuala Lumpur	√	√	√

NCR Closure Audit Plan

Date	Time	Subjects	MNM
Friday, 1/7/2022		Travel from KL to Temerloh and check in Hotel.	√
Saturday, 2/7/2022	0800-0900	Travelling from Hotel to Kerdau POM	√
	0900-0930	Kerdau POM: Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder's/workers consultation). 	√
	0930–1130	Kerdau POM, Kerdau Estate & Sg Mai Estate: Verification on previous Major NC. Site observation ,workers interview (individual and group session) if necessary Document review – implemented evidence	√
	1130–1230	Closing	√
	1230-1700	Travelling back to Kuala Lumpur	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	<p>Yes. SDP TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI):</p> <p>http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</p>	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	<p>Yes. All estates and mill has been certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 1st Oct 2018, the mill has completed the selling off transaction.</p> <p>In Indonesia, PT Mitral Austral Sejahtera was sold and currently SDP have no control in the management.</p>	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	No. There is no new acquisitions as at latest TBP 2021.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Although there are deviation has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	<p>Yes.</p> <p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties was sold and currently Sime Darby Plantation Berhad have no control in the management.</p>	Complied

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	<p>The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019. Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: www.rspo.org/certification/public-announcement</p> <p>For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations. ACOP 2020 has been cross-referenced as below: www.rspo.org/members/29</p>	
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>Although there lapses has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as these 2 assets were disposed.</p>	<p>Complied</p>
<p>Un-Certified Units or Holdings</p>		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p>	<p>Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification 1. NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/certification/new-</p>	<p>Complied</p>

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	<p>plantingprocedure/public-consultations/sime-darbyplantation-berhad-nbpol-poliamba-limited</p> <p>2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-a-subsiary-of-sime-darby-plantationbhd-guadalcanal-plain-palm-oil-ltd</p> <p>3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-ramuagri-industries-ltd</p> <p>4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-ramu-agri-industries-limited</p> <p>5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-higaturu-oil-palms</p> <p>6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO Website https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamawan-png</p> <p>7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO Website https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamendauen-png</p> <p>8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-roka-mini-estate</p> <p>9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-j-estate</p> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-</p>	
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	<p>britainpalm-oil-limited-higaturu-oil-palm</p> <p>11. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc-new-planting-assessment</p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment1</p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment</p> <p>Management units for 11 – 13 above were disposed.</p>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as both sites was disposed.</p> <p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancy between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of 14/07/2021, 10 LUCAs were approved with 0 conservation liability and remaining 9 are still pending from RSPO.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>Sime Darby Plantation maintain corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue are mainly awaiting for Land Titles. The last audit was conducted between July 2020 – August 2020.</p>	<p>Complied</p>

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	The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance.	
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No any critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company	Complied

3.2 Progress of scheme smallholders and/or outgrowers

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

Approved Time Bound Plan

SDP - RSPO Certification for Time Bound Plan - Malaysia Operations

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

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

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

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

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

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

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

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

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

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

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		Gunung Kemas Estate			Kotabaru District – South Kalimantan				
		Laut Timur Estate							
		Pantai Timur Estate							
		KKPA MBP	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.	
10	PT Guthrie Pecconina	Rantau Panjang Mill	-	-	Musu Banyuasin District – South Sumatera	Certified	16/03/2012	Remarks: Land legalisation process for 4152.70 ha is still in process.	
		Rantau Panjang Estate							
		Bumi Ayu Estate							
		Karang Ringin Estate							
		Napal Estate							
		Mangun Jaya Estate							
		Sungai Jernih Estate and GPI KKPA Estate	2023	-					-
11	PT Laguna Mandiri	Rantau Mill	-	-	Kotabaru District – South Kalimantan	Certified	30/12/2011		
		Rantau Estate							
		Matalok Estate							
		Betung Mill							01/04/2014
		Betung Estate							
		Sekayu Estate							
12		Sekunyir Mill	-	-		Certified	23/11/2010	-	

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

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

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

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

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name						
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	-	Guadalcanal Province, Solomon Islands	Certified	18/03/2011	-
		Tetere Estate					
		Ngalimbiu Estate					
		Mbalisuna Estate					
		Smallholders – West Zone (83)					
		Smallholders – Central Zone (53)					

		Smallholders – MBA East Zone (59)					
		Smallholders – MBE East Zone (37)					
2	Milne Bay Estate (MEB)	Hagita Oil Mill	-	Milne Bay Province, PNG	Certified	15/02/2018	-
		Giligili Estate					
		Hagita Estate					
		Waigani Estate					
		Sagarai Estate					
		Padipadi Estate					
		Mariawatte Estate					
		Smallholders – East Gurney Estate (264)					
		Smallholders – West Gurney Estate (229)					
		Smallholders – East Sagarai Estate (157)					
		Smallholders – West Sagarai Estate (221)					
3	Poliamba (POL)	Poliamba Oil Mill	-	New Ireland Province, PNG	Certified	19/03/2012	-
		Kara Estate					
		Nalik Estate					
		West Coast Estate					
		Noatsi Estate					
		Madak Estate					
		Smallholders -North Division (615)					
		Smallholders- South Division (868)					
		Smallholders -West Division (309)					
4	Ramu Agricultural Industrial Ltd (RAIL)	Gusap Mill	-	Morobe Province, PNG	Certified	05/08/2010	-
		Gusap East (Gusap) Estate					

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

		Numundo Mill				
		Waraston Mill				
		Bebere Estate				
		Kumbango Estate				
		Togulo Estate				
		Dami Estate				
		Waisisi Estate				
		Kautu Estate				
		Karausu Estate				
		Moroa Estate				
		Bilomi Estate				
		Loata Estate				
		Haella Estate				
		Garu Estate				
		Daliavu Estate				
		Sapuri Estate				
		Malilimi Estate				
		Rigula Estate				
		Numundo Estate				
		Navarai / Karato ME /KDC EU Estate				
		Volupai / Lotomgam / Natupi / Goruru Estate				
		Lolokoru Estate				
		Ove Estate				
		Tamare Estate				

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

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; No Minor nonconformities and *One* (1) Opportunity For Improvement raised. The *SOU Kerdu POM 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 #	2187928-202204-M1	Issued Date	15/4/2022
Due Date	14/7/2022	Closure Date	2/7/2022
Indicator & Category (Critical / Minor)	3.7.1 (Critical)		
Statement of Nonconformity:	Found the workers was inadequate understand for safety health training		
Requirement Reference:	(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. - Critical (Major) compliance -		
Objective Evidence:	<p>Kerdau estate - Found the understanding of workers was inadequate, sighted the training record for spraying and calibration training dated 12/11/2021 however during verification onsite sighted the workers using mineral water as chemical container for selective pesticide application in Kerdau estate. From the interview with the workers, they not aware regarding this issue.</p> <p>In Kerdau Mill, the chemical handling training already conducted by management dated 24/3/2022. During the site visit, it was observed that the boiler water test was conducted at the boiler station (Non designated area) instead of laboratory. Interview with workers also indicated that they have been testing the boiler water at the boiler station for almost a year.</p> <p>Sg Mai Estate - the training on workshop safety conducted by management dated 18/2/2022 was not effective. Site visit to the workshop show that the flashback arrestor was not installed for the oxy cylinder. Interview with the workshop personnel revealed that he was made to understand that the device is only needed for the acetylene tank not for oxy cylinder tank.</p>		
Corrections:	<p>Kerdau Estate</p> <ol style="list-style-type: none"> Estate to conduct refresher training on chemical handling especially for sprayer/weeder. (Refer to Appendix 1) Estate to replace mineral water container with proper chemical container using Inter16 		

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	<p>pump for selective weeding. (Refer to Appendix 2)</p> <p>Sg Mai Estate Installed new Flashback arrestors for Oxy Cylinder and Acetylene Cylinder. Refresher training have been carried out to the workshop personnel on 18/04/2022. This training focusing on:</p> <ul style="list-style-type: none"> • Refresher on safety PPE during work at Estate Workshop • Refresher on Workshop SOPs. • Recheck all equipment at workshop area such as Oxy Cylinder, Oxy Cylinder, Working Bench <p>and others to ensure all equipment are safe and ready to used.</p> <p>Kerdau Mill The place for conducting boiler water analysis has been moved to the mini laboratory.</p>
Root Cause Analysis:	Assessment of health & safety training not being conducted to evaluate training effectiveness
Corrective Actions:	<p>Kerdau Estate Monitoring on chemical handling training effectiveness during work place inspection and site observation by the estate management.</p> <p>Sg Mai Estate</p> <ol style="list-style-type: none"> 1. To carried out site visit regularly to the workshop to ensure workshop at good condition and safe to be used. 2. Carried out random interviewed to workshop personnel regarding SOPs at workshop and focusing on safety. <p>Kerdau Mill</p> <ol style="list-style-type: none"> 1. To improve the effectiveness of chemical handling training with the assessment on workers' understanding 2. To carry out periodical inspection on chemical handling and analysis activities
Assessment Conclusion:	<p>As per Document verification on 2/7/2022 and site verification as per below:- From the record in Kerdau estate, the Slashing and poisoning training been conducted by the management dated 19/4/2022 and evaluation record on 22/4/2022.</p> <p>Kerdau POM. The monitoring on training effectiveness was available as per verification.</p> <p>The training on Chemical handling conducted on 26/5/2022 and evaluation record was on 3/6/2022. The interview with workers conducted and they were aware regarding to chemical handling and emergency action been verified.</p> <p>The evaluation record on slashing and poisoning training dated June 2022 and training record on 18/4/2022 for PPE and chemical usage. The evidence provided for the closure of Critical Non-conformity raised was deemed to be sufficient to address the correction and corrective action plan provided by the management. Therefor the Critical Non-Conformity was closed on 2/7/2022.</p>

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Opportunity for Improvements	
OFI #	Description
OFI 1	<p><u>2187928-202204-I1</u></p> <p>Indicator 6.2.4</p> <p>Provision of amenities including sundry shop, canteen & motorcycle workshop within Kerbau Estate workers housing area could be observe further mainly on the upkeeping of the building and its surrounding.</p>

Positive Findings	
PF #	Description
PF 1	Good commitment and corporation from the management.
PF 2	Generally well implementation of Good Agricultural Practices (GAP).

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2043087-202104-M1	Issued Date	9/4/2021
Due Date	7/7/2021	Closure Date	25/6/2021
Indicator & Category (Critical / Minor)	7.3.1 Critical (Reoccurrence)		
Statement of Nonconformity:	The management of waste was not in accordance with the estate’s Waste Management Plans and Legal Requirements. Due to this being a reoccurrence of Minor NonConformity, a Major Non-conformity was raised.		
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:	<p>1. Scheduled Waste generated were not properly identified, notified and maintained its inventory according to Environment Quality (Scheduled Waste) Regulations 2005.</p> <p>Sg Mai Estate</p> <p>a) Based on the 2nd Schedule – Notification of Scheduled Waste, the estate has only notified DOE on the generation of SW102, SW305, SW404 and SW409. Based on the visit to the SW store and verification on the SW Inventory Records the estate generates SW 410, SW306 and SW418 which have not been notified to DOE.</p> <p>b) The estate has generated SW 306 (Spent Hydraulic); Date of generation: 14/02/2019. The SW Store Clerk mentioned that the spent hydraulic has been disposed on 17/09/2020. There was no evidence (ex. Consignment Note) of disposal of the SW to a licensed SW Manager.</p> <p>c) The Clinical Waste (SW 404) does not indicate the generation date and only states the date of disposal. Based on the last disposal of clinical waste, it was verified that the waste was generated in 28.08.2020 and disposal is on</p>		

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26/03/2021 which exceeds the limit allowed by DOE (Total Days: 210). The estate did not maintain an inventory record for the Clinical Waste generated.

- d) There were no inventory records for SW 409 (containers, bags or equipment contaminated with chemicals, pesticides, mineral oil or scheduled wastes). Sighted in the SW Store were Plastic Containers (Grease and Lubricant Drums) contaminated with SW stored. It was stated at the store the date of generation is 29/01/2021. There were no records of disposal of these waste prior to this as well.

- 2. Environment Quality (Scheduled Waste) regulations 2005; PU(A) 294/2005; Regulation 9; Storage of Scheduled Waste; No. 5 – Any person may store scheduled waste generated by him for 180 days or less after its generation.

Chenor Estate

SW	Date Generated	Date Disposed	Difference Days
SW404 (Clinical Waste)	27.04.2020	18/12/2020	236

Mentakab estate

SW	Date Generated	Date Disposed	Difference Days
SW410 (Spent Filter)	23/07/2020	06/04/2021	258
SW 409 (Contaminated Chemical Containers)	30/01/2020	06/04/2021	421
SW 305 (Spent Lubricant Oil)	30/01/2020	06/04/2021	421

- 3. The Waste Management Plan for Kerbau Estate for domestic waste was stated as below:
 - To collect all recyclable materials at the workers housing complex, office, workshop, store, shop and call recycle collectors for disposal.
 - Create further awareness on recycling among workers through training and recycling campaigns.

Kerdau Estate

It was sighted at the landfill at Field P15B that there were recyclable wastes (plastic containers) in abundance disposed at the landfill.

- There was no evidence of any segregation done prior to waste being disposed to the landfill.
- There was no evidence that any recyclable waste has been sold to any recycle waste collector prior to this.
- There was no evidence that any awareness on recycling created among workers through recycling campaigns or trainings.

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	<p>This was not in accordance with the Environmental Management Plan – Waste Management Plan.</p> <p>4.</p> <p>Kerdau Estate</p> <p>Stated in the Waste Management Plan for Chemical Containers (SW409) - Collect & Record amount of empty containers.</p> <p>Store all scheduled waste under lock and key.</p>
Corrections:	<p><u>Sg Mai Estate</u></p> <ol style="list-style-type: none"> 1. The estate has notified DOE via e-swiss on 12/04/2021 (Monday) on the generation of SW 410, SW306 and SW418. 2. The estate has corrected the inventory record for SW 305 and SW 306. 3. The clinical waste SW 404 has been included in inventory record. 4. SW 409 already included in SW inventory record. <p>Chenor Estate</p> <p>To request extension from DOE and to combine the disposal with other sister estates.</p> <p>Kerdau Estate</p> <ol style="list-style-type: none"> 1. To collect and bring back all the chemical containers at field after usage. <p>Mentakab Estate</p> <ol style="list-style-type: none"> 1. To conduct a SW training for the new appointed store clerk by RSQM representative.
Root Cause Analysis:	<p>Ineffective monitoring and incomprehensive training of waste management system and legal requirement.</p>
Corrective Actions:	<p><u>Sg Mai Estate</u></p> <ol style="list-style-type: none"> 1. To conduct scheduled waste training to all personnel at scheduled waste generator work station and monitor the implementation via workplace inspection on quarterly basis. <p><u>Chenor Estate</u></p> <ol style="list-style-type: none"> 1. To assign and train a dedicated personnel on waste management plan and legal requirement. <p><u>Kerdau Estate</u></p> <ol style="list-style-type: none"> 1. Estate will conduct a training/briefing to educate all workers regarding recycle and provide proper collection point the recyclable waste prior being collected by for disposal. 2. To assign the dedicated staff (upkeep staff) for each division to monitor the movement of the chemical container. <p><u>Mentakab Estate</u></p>

	<p>1. To train a dedicated personnel on waste management plan and legal requirement. Plan to conduct SW training in June 2021.</p>
<p>Assessment Conclusion:</p>	<p>Critical NC Close Out Verification</p> <p><u>Sg Mai Estate</u></p> <p>1. The state management has notified DOE via Second Schedule – Notification of Schedule Waste on 20/04/2021 for the Schedule Waste below:</p> <ul style="list-style-type: none"> a. SW305 - Engine Oil (Notification Number: 20210402015RJ5TPB) b. SW102 – Used Batteries (Notification Number: 202104201547M2NS) c. SW306 – Used Hydraulic Oil (Notification Number: 2021042015OE6T4X) d. SW404 – Clinical Waste (Notification Number: 2021042015SC0TZX) e. SW409 – Used Chemical Containers (Notification Number: 2021042015A4EUN2) f. SW410 – Used Filter (Notification Number: 2021042015UCH95S) g. SW418 – Paint Containers (Notification Number: 2021042016IOP652) <p>The estate management has updated the eSWIS to include SW305 (Used Engine Oil), SW306 (Use Hydraulic Oil), SW404 (Clinical Waste) and SW409 (Used Chemical Containers). The Fifth Schedule - Inventory Of Schedule Waste (File Reference Number: AS:C11/123//000/033) for the Month of April was available for verification.</p> <p>Schedule Waste and Chemical Management Training was conducted on 25/05/2020 attended by the Assistant Managers, RSQM representatives, Medical Assistant, Supervisors and foreman.</p> <p><u>Chenor Estate</u></p> <ul style="list-style-type: none"> 1. The management has purchased 10 Litre Sharp Container, Yellow Bags and Cable ties from Flora Sentosa Sdn Bhd (DO Number: DO 028332) on 28/05/2021. This will be used to store and prepare for disposal of the SW404 – Clinical Waste. 2. Schedule Waste Management Training was conducted on 08/04/2021 at the estate. 3. The management has appointed Mohd Shamsul Nahar Bin Samsu as the storekeeper. The appointment letter dated 12/04/2021 undersigned by the Estate Manager states the job description among others as 'to monitor Schedule Waste items'. <p><u>Kerdau Estate</u></p> <ul style="list-style-type: none"> 1. The management has established a memo addressed to all the staffs undersigned by the Senior Manager of Kerdau Estate stating the duties of the staff which includes "to ensure all used chemical containers are returned to the chemical store". The memo was available for verification during the assessment.

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	<p>2. The estate has established a Daily Chemical Container Monitoring Record which illustrates the outgoing and incoming of chemical containers at the chemical store. Verified the Daily Chemical Container Monitoring Record for the month of May 2021.</p> <p>3. A Recycling Training has been conducted for all the workers at the estate during the morning muster on 17/04/2021.</p> <p><u>Mentakab Estate</u></p> <p>1. The estate has conducted a Scheduled Waste Training on 04/06/2021 attended by the Assistant Managers, Field Supervisors, Medical Assistant, Store Clerk and Storekeepers.</p> <p>The evidence provided for the closure of Critical Non-conformity raised was deemed to be sufficient to address the correction and corrective action plan provided by the management. There for the Critical Non-Conformity is closed.</p>																																								
<p>Effectiveness Closure (for previous audit closed Critical NC):</p>	<p>Visits to the estates confirmed and verified the following details;</p> <p>Sg Mai Estate</p> <p>a. The estate has notified DOE via e-swiss on 12/04/2021 (Monday) on the generation of SW 410, SW306,SW305,SW102,SW404,SW409, and SW418.</p> <p>b. The estate has corrected the inventory record for SW 305 and SW 306.</p> <p>c. The clinical waste SW 404 has been included in inventory record.</p> <p>d. SW 409 already included in SW inventory record.</p> <p>e. Details of SW despatches as recorded below and within the stipulated period</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th></th> <th></th> <th>SW418</th> <th>SW410</th> <th>SW409</th> <th>SW404</th> <th>SW305</th> <th>SW306</th> </tr> </thead> <tbody> <tr> <td>Sg Mai</td> <td>22/3/22</td> <td>0.020</td> <td>0.200</td> <td>0.405</td> <td>-</td> <td>0.500</td> <td>0.100</td> </tr> <tr> <td>Sg Mai</td> <td>03/2/22</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>0.500</td> <td>0.100</td> </tr> <tr> <td>Sg Mai</td> <td>13/1/22</td> <td>-</td> <td>-</td> <td>-</td> <td>0.003</td> <td>-</td> <td>-</td> </tr> <tr> <td>Sg Mai</td> <td>03/9/21</td> <td>-</td> <td>-</td> <td>-</td> <td>0.002</td> <td>-</td> <td>-</td> </tr> </tbody> </table> <p>f) To conduct scheduled waste training to all personnel at scheduled waste generator work station and monitor the implementation via workplace inspection on quarterly basis. - Training was made dated 17/3/22 attended by 121 employees and on 25/05/2021 in presence of 6 personnel.</p> <p>Chenor Estate</p> <p>a) The estate has requested extension from DOE and to combine the disposal with other sister estates. The latest disposal being made through SDI upon vehicle servicing completion. The clinical waste will be managed by the MA and delivered direct to Kualiti Alam Sdn Bhd within the stipulated period.</p> <p>b) To assign and train a dedicated personnel on waste management plan and legal requirement. - An Assistant Manager has been appointed as PIC for WMP and Legal Requirement. He will be assisted by a Field staff and the Chief Clerk on the legal issues.</p>			SW418	SW410	SW409	SW404	SW305	SW306	Sg Mai	22/3/22	0.020	0.200	0.405	-	0.500	0.100	Sg Mai	03/2/22	-	-	-	-	0.500	0.100	Sg Mai	13/1/22	-	-	-	0.003	-	-	Sg Mai	03/9/21	-	-	-	0.002	-	-
		SW418	SW410	SW409	SW404	SW305	SW306																																		
Sg Mai	22/3/22	0.020	0.200	0.405	-	0.500	0.100																																		
Sg Mai	03/2/22	-	-	-	-	0.500	0.100																																		
Sg Mai	13/1/22	-	-	-	0.003	-	-																																		
Sg Mai	03/9/21	-	-	-	0.002	-	-																																		

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	<p>Kerdau Estate</p> <p>a. To collect and bring back all the chemical containers at field after usage. - During the field visit to the estate on 11/04/2022 there were no discoveries of empty containers being left over in the fields upon weeding completion.</p> <p>b. Estate will conduct a training/briefing to educate all workers regarding recycle and provide proper collection point the recyclable waste prior being collected by for disposal - Training being made on 04/1/2022 to all employees together with other SOP and SDP policies.</p> <p>c. To assign the dedicated staff (upkeep staff) for each division to monitor the movement of the chemical container. - Each upkeep staff for the respective division are assigned to monitor the waste management and proper storage and disposal of empty containers.</p> <p>Mentakab Estate</p> <p>a. To conduct a SW training for the new appointed store clerk. - RSQM representative had dated conducted a training in relation to SW dated 21/03/22 to all all present during the muster. In presence also the store clerk.</p> <p>b. To train a dedicated personnel on waste management plan and legal requirement. - This was completed on 04/06/2021 made to management team presence of 6 people</p> <p>There are no reoccurrence issue been raised thus the Major NC remained close.</p>
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Non-conformity			
NCR Ref #	2043087-202104-M2	Issued Date	9/4/2021
Due Date	7/7/2021	Closure Date	25/6/2021
Indicator & Category (Critical / Minor)	6.2.3 (Critical)		
Statement of Nonconformity:	Evidence of legal compliance for lawful deductions were not effectively demonstrated.		
Requirement Reference:	There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.		
Objective Evidence:	<p><u>Mentakab Estate</u></p> <p>Reviewed the employees Allowance Deduction details for January 2021 to March 2021 and found that there were 28 workers who joined as union (MAPA/NUPW) members. It was found that there were deduction of wages of RM 11.00 for the union membership fees since they joined on 01/10/2019, 01/12/2019 and 01/02/2020. There was no reimbursement of RM 3.00 made to the workers as per MAPA/NUPW Circular No. 22/2015 dated 04/08/2015.</p> <p>The sampled workers are as below:</p> <ol style="list-style-type: none"> 1. Employee No.: 151764 (NUPW start date 01/12/2019) 2. Employee No.: 150868 (NUPW start date 01/02/2020) 3. Employee No.: 151875 (NUPW start date 01/10/2019) 		

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	<p><u>Kerdau Estate</u> The management has made deductions of wages for the purpose of school bus fare of RM 25.00/person. Total 19 workers have been made deduction of wages as verified on Employees Allowance and Deductions Details of March 2021 for deduction code D065: School Bus Deduction. However there is no approval obtained from Labour Department for the said deduction.</p>
<p>Corrections:</p>	<p><u>Mentakab Estate</u> 1. To calculate the total refund of RM3.00 per workers and reimburse the respective workers in April 2021 salary. 2. To inform union representative during meeting with union to ensure the union members receive the reimbursement due to them as per stipulated at Employment Act 1955 and as per SDP Human Right Charter.</p> <p><u>Kerdau Estate</u> 1. Management to request an approval from authority (JTK) on the school bus deduction.</p>
<p>Root Cause Analysis:</p>	<p>The mechanism to monitor the compliance to legal requirement is not effective.</p>
<p>Corrective Actions:</p>	<p>Spot checks by RQSM/Careline on a quarterly basis during their visit to the respective operating unit.</p>
<p>Assessment Conclusion:</p>	<p>Critical NC Close Out Verification</p> <p><u>Mentakab Estate</u> 1. The Union Representatives were informed on the reimbursement during the meeting held on 25/05/2021. Records of the meeting held was available for verification. 2. The management has reimbursed the unlawful deductions made to the identified workers in the Month of April 2021. Sampled the workers payslips for the Month of April 2021 to include the reimbursement categorised under Reimbursement (A-145 Insurance Subsidy).</p> <p><u>Kerdau Estate</u> 1. The management has halted the deduction of wages for the purpose of school bus fare for the workers. Verified the Payslip for the Month of April for Employer with Employer Number: 0000153747 did not have any unauthorized deductions. 2. The management has submitted the request of salary deduction approval to Jabatan Tenaga Kerja (JTK) Negeri on 07.04.2021. The request letter and attached forms were available for verification during the assessment. Currently the management is awaiting the approval from JTK.</p> <p>The evidence provided for the closure of Critical Non-conformity raised was deemed to be sufficient to address the correction and corrective action plan provided by the management. Therefore the Critical Non-Conformity is closed.</p>

<p>Effectiveness Closure (for previous audit closed Critical NC):</p>	<p>Records of payslip and check-roll documents available to the workers for sample employees sighted as as following:</p> <p>Kerdau POM:</p> <ul style="list-style-type: none"> - Employee # 23398; M; General - Employee # 23432; M; B Shift - Employee # 52228; M; General - Employee # 136473; F; General - Employee # 146935; F; Laboratory - Employee # 156940; F; General - Employee # 162279; M; B Shift - Employee # 166790; M; B Shift <p>Kerdau Estate:</p> <ul style="list-style-type: none"> - Employee # 161368; F; Weighbridge Operator - Employee # 161454; F; General Worker - Employee # 163788; M; Field Worker - Employee # 163919; M; General Worker - Employee # 148125; M; FFB Carrier - Employee # 161366; M; Harvesting Mandore - Employee # 111140; M; FFB Cutter - Employee # 123359; M; Harvesting Mandore - Employee # 152186; M; FFB Carrier - Employee # 107570; M; Machine Operator <p>Mentakab Estate:</p> <ul style="list-style-type: none"> - Employee # 20806; F; Daily Rated or General Workers - Employee # 20808; F; Piece Rated Workers (Field Agrmnt) - Employee # 20816; F; Daily Rated Or General Workers - Employee # 29302; F; Daily Rated Or General Workers - Employee # 52085; M; Oil Palm Harvesters - Employee # 108293; M; Oil Palm Harvesters - Employee # 121310; M; Piece Rated Workers (Field Agrmnt) - Employee # 127902; M; Oil Palm Harvesters - Employee # 140311; M; Oil Palm Harvesters - Employee # 160727; M; Daily Rated Or General Workers - Employee # 160764; F; Daily Rated Or General Workers - Employee # 166484; M; Daily Rated Or General Workers - Employee # 167964; M; Daily Rated Or General Workers <p>Chenor Estate:</p> <ul style="list-style-type: none"> - Employee # 20244; F; Daily Rated - Employee # 64811; M; Oil Palm Agreement
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	<ul style="list-style-type: none"> - Employee # 108354; M; Daily Rated - Employee # 138344; F; Daily Rated - Employee # 138911; M; Piece Rated - Employee # 143615; F; Daily Rated - Employee # 149478; M; Oil Palm Agreement - Employee # 151475; M; Piece Rated - Employee # 154795; M; Piece Rated - Employee # 155537; F; Daily Rated <p>Sungai Mai Estate:</p> <ul style="list-style-type: none"> - Employee # 120181; M; Piece Rated Worker - Employee # 162943; M; FFB Cutter - Employee # 151922; M; Loose Fruit Collector - Employee # 152743; F; FFB Carrier - Employee # 153885; M; Field Worker - Employee # 96323; M; Piece Rated Worker - Employee # 21054; F; Gardener - Employee # 21070; F; Gardener - Employee # 21118; M; FFB Cutter - Employee # 164985; F; Field Worker - Employee # 167283; F; Field Worker <p>Records shown all relevant legal compliance requirements were met by SOU 11 Thus the Major NC remained closed.</p>
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Non-conformity			
NCR Ref #	2043087-202104-M3	Issued Date	9/4/2021
Due Date	7/7/2021	Closure Date	25/6/2021
Indicator & Category (Critical / Minor)	3.6.2 Critical		
Statement of Nonconformity:	Health and safety mitigation measures was not adequately implemented.		
Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	<p><u>Kerdau Estate</u></p> <p>There was soil erosion sighted near the pesticide mixing area. However, proper mitigation measures to address the risk identified was not fully implemented as the affected slope section was still at risk for further erosion endangering works to be carried out at near the pesticide mixing area.</p> <p><u>Kerdau POM</u></p>		

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	<p>a) Typhoid vaccination record was not available for a worker sighted working at the canteen kitchen.</p> <p>b) Vehicle side view mirror for shovel was sighted missing at both left & right sides during in operation at the FFB ramp area.</p> <p><u>Mentakab Estate</u> Water tank for the emergency shower and eye wash supply was containing settlement of dust particulates and other impurities.</p>
<p>Corrections:</p>	<p><u>Kerdau Estate</u> Construct the proper wall/bund and drainage to prevent from further erosion.</p> <p><u>Kerdau POM</u> 1. Arrange for typhoid vaccination for all her workers with immediate effect. 2. To install and replace shovel’s side mirror immediately.</p> <p><u>Mentakab Estate</u> To assign PIC for emergency/safety equipment cleanliness and carry out monthly routine and cleaning schedule to ensure the emergency shower is always in good condition.</p>
<p>Root Cause Analysis:</p>	<p>Ineffective coverage of health and safety risk mitigation measure at workplace and other activities in the premises.</p>
<p>Corrective Actions:</p>	<p>1. Training on health and safety risk assessment to cover all activities in the operation by RSQM representative.</p> <p>To conduct quarterly work place inspection to ensure all risk mitigation measure are in place.</p>
<p>Assessment Conclusion:</p>	<p>Critical NC Close Out Verification</p> <p><u>Kerdau Estate</u> 1. During the remote assessment it was verified that the management has constructed a bund using soil bags near the pesticide mixing area. 2. HIRARC Training has been conducted on 24/05/2021 by the RSQM team attended by the Assistant Manager and Field Staffs. 3. Work Place Inspection has been carried out to ensure all risk mitigation measures are in place. Verified the records of the latest Work Place Inspection dated 24/05/2021.</p> <p><u>Kerdau POM</u> 1. The Shovel’s side view mirrors has been fixed and picture evidence were available for verification. 2. HIRARC Training for Vehicle Driver was done on 04/05/2021 and the training records were available for verification 3. Typhoid Vaccination has been provided to the identified worker. Verified the ‘Kad Pengesahan Kesihatan – Majlis Perbandaraan Temerloh’ stated that the</p>

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	<p>canteen worker had obtained the vaccination from Klinik Primamedik on 13/04/2021.</p> <p><u>Mentakab Estate</u></p> <ol style="list-style-type: none"> The management has appointed Mohd. Shaifful B. Khamis as the person incharge of Emergency and Safety Equipment Cleanliness as stated in the appointment letter dated 05/05/2021 undersigned by the Estate Manager. HIRARC Training has been conducted on 03/06/2021 for this issue attended by the Assistant Managers. Field Supervisors and Medical Assistant. <p>The evidence provided for the closure of Critical Non-conformity raised was deemed to be sufficient to address the correction and corrective action plan provided by the management. Therefor the Critical Non-Conformity is closed.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>From the verification on implementation of H&S plan, Kerdu Palm Oil Mill and Supply Base has maintained an approved Health and Safety Policy signed by top management that is displayed prominently on notice boards in English/Bahasa Malaysia. Safety & Health Management Plan was available accordingly. The effectiveness of H&S plan was verified as per below record verification:-</p> <p>As per legal application in H&S plan, the Noise Risk Assessment Report conducted by SH Safety Consultancy Sdn Bhd dated 21/9/2021 (HQ/09/PEB/00/97). From the recommendation the signage need to be displayed at Heavy Vehicles, Workshop, Pump house and upkeep (grass cutting and blower). From the site verification the signage was available and maintain in good condition accordingly. Audiometric test as per recommendation only for heavy tractor, the management already send 30 driver to the Best Hearing Aid Centre Sdn Bhd dated 28/3/2022.</p> <p>The other verification was on HIRARC in Kerdu estate dated 13/12/2021 covered under operation manuring, spraying (inter pump) and harvesting. The implementation was accordingly as per HIRARC such as PPE was available.</p> <p>CHRA for Kerdu estate, assessment by Azhar Hazardous Chemical Consultancy dated 11/6/2020. Report Ref no. HQ/14/ASS/00/00001-2020/11. From the recommendation in the CHRA, the Medical surveillance dated 7/2/2022 for manganese exposure and Cholonesterase exposure was available. This assessment conducted at Klinik Sulaiman Temerloh (JKKP HQ/15/DOC/00/290). From the result, all workers was fit to works with chemical Thus Major NC remained closed.</p>

Non-conformity			
NCR Ref #	2043087-202104-M4	Issued Date	9/4/2021
Due Date	7/7/2021	Closure Date	25/6/2021
Indicator & Category (Critical / Minor)	6.7.3 Critical		
Statement of Nonconformity:	Personal protective equipment (PPE) compliance and sanitation facilities upkeeping was not fully effective.		
Requirement Reference:	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and		

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	<p>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>
Objective Evidence:	<p><u>Kerdau Estate</u> Workers sanitation facilities i.e. bathroom, toilet and personal clothing washing machine for pesticide application workers were not in well maintained condition.</p> <p><u>Sungai Mai Estate</u> During the field visit at Field No. 00SA sighted that the sprayers do not bring the safety goggle with them during the spraying activity although the goggle been provided by the employer to the respective workers and recorded in the PPE issuance record.</p> <p><u>Chenor Estate</u> During the manuring activity field visit at Field No. 16A sighted that the workers do not bring the safety goggle with them during the manuring activity although the goggle been provided by the employer to the respective workers and recorded in the PPE issuance record.</p> <p><u>Mentakab Estate</u> Water tab pressure for the sanitation facilities i.e. bathroom and toilet for pesticide application workers was low and 1 of the bathroom shower tap was not discharging water during testing of the water supply.</p>
Corrections:	<p><u>Kerdau Estate</u> To assignment the dedicated person to monitor the condition of the facilities.</p> <p><u>Sg Mai Estate</u> To conduct briefing and training for the sprayers on the correct PPE usage (apron, goggle, mask, glove, helmet and rubber boot).</p> <p><u>Chenor Estate</u> All workers required to wear suitable PPEs based on type of works as stated in SOPs and CHRA. Continuous refresher training required to be done to increase level of awareness among the workers.</p> <p><u>Mentakab Estate</u> To change new pipeline connecting to sanitation facilities.</p>
Root Cause Analysis:	<p>Insufficient monitoring system to compliance to SOP and maintenance system of sanitation facilities</p>
Corrective Actions:	<p>1. Continuous briefing and training on usage of PPE during morning muster and to monitor the PPE usage by Mandore/Supervisor.</p> <p>To conduct quarterly work place inspection to ensure maintenance of facilities are in order.</p>
Assessment Conclusion:	<p>Critical NC Close Out Verification</p>

	<p><u>Kerdau Estate</u></p> <ol style="list-style-type: none"> 1. The management has established a memo addressed to all the staffs undersigned by the Senior Manager of Kerdau Estate stating the duties of the staffs which includes "to ensure the sanitation area and washing machine are always in good and safe working condition". The memo was available for verification during the assessment. 2. HIRARC training was conducted on 24/05/2021. 3. Work Place Inspection was carried out on 24/05/2021. <p><u>Sg Mai Estate</u></p> <ol style="list-style-type: none"> 1. PPE Training has been conducted for all the sprayers on 08/04/2021. Records of training done was available for verification. 2. Work Place Inspection was done to identify the PPE compliance and monitor the usage of PPE among the workers. The latest Work Place Inspection records were available dated 10/06/2021. <p><u>Chenor Estate</u></p> <ol style="list-style-type: none"> 1. Spraying Application and PPE Training was conducted for all Sprayer and Manurers on 05/05/2021 2. The estate has established a Weekly PPE Monitoring Checklist to monitor the usage and condition of the PPE used by the workers. The weekly PPE Monitoring Checklist was available for verification for the Month of April and May 2021. <p><u>Mentakab Estate</u></p> <ol style="list-style-type: none"> 1. The management has repaired the piping for the sanitation facility and picture evidence were available to demonstrate that the water supply was available. 2. A training on Workplace Inspection was conducted for the Field Staffs on 25/06/2021 on methods to conduct the Workplace Inspection. 3. Workplace Inspection was conducted on 25/06/2021 at Mentakab Estate. <p>The evidence provided for the closure of Critical Non-conformity raised was deemed to be sufficient to address the correction and corrective action plan provided by the management. Therefor the Critical Non-Conformity is closed.</p>
<p>Effectiveness Closure (for previous audit closed Critical NC):</p>	<p>From the interview and record verification, the appropriate personal protective equipment (PPE) been provided 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. All workers at the mill and estates have been trained in safe work practices including use of PPE related to their job function. Sampling in Kerdau POM for Engine Room :- Hearing Conservation Training conducted on 7/4/2022 in house training conducted by SA attended by 25 workers for engine room, steriliser, kernel plant and others. PPE Record verification; -</p>

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	Item/workers id	23345	79767	30387
	Ear plug	12/4/2022		7/4/2022
	Leather glove		7/2/2022	5/10/2021
	Ear Muff	15/3/2022	6/5/2021	24/5/2021
	Safety Shoes	4/9/2021	6/5/2021	27/12/2021
	Safety Helmet	8/12/21	4/9/2020	
Thus Major NC remained closed				

Non-conformity			
NCR Ref #	2043087-202104-N1	Issued Date	9/4/2021
Due Date	15/4/2022	Closure Date	15/4/2022
Indicator & Category (Critical / Minor)	2.2.2 Minor		
Statement of Nonconformity:	Evidence of legal due diligence of contracted third parties was not effectively demonstrated		
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
Objective Evidence:	<p><u>Kerdau POM</u></p> <p>Employment contract reviewed for the contractors worker (SS Naveen Engineering) found the following issues:</p> <ol style="list-style-type: none"> 1. Clause 3.1 – The workers will receive a basic wages of RM 1,100.00 per month. In fact the location of work falls under the Majlis Perbandaraan Temerloh which shall be RM 1,200.00 per month in accordance with Minimum Wage Order 2020. 2. Clause 16.1 – The first travelling expenses from Bangladesh to any agreed point of entry in Malaysia shall be borne by the worker. In contra, the travelling expenses from country of origin to Malaysia shall be borne by the employer as part of the recruitment process expenses. 3. Work Permit/VISA for SS Naveen workers were under different company name: <ul style="list-style-type: none"> - Permit No. PE1985676, Passport No. BR0584037, Company: Tan Kee Chuan Construction - Permit No. PE9897268, Passport No. BX0724001, Company: ABI Teamworks Sdn Bhd - Permit No. PE7423914, Passport No. BX0642498, Company: Bina Jatim Sdn Bhd 		

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	<p><u>Chenor Estate</u></p> <p>Employment Contract between Pacat Emas Enterprise and workers have not detailed out the terms and conditions and compliances towards Employment Act 1955 requirements. Terms and conditions of employments such as period of notice, reason for dismissal, entitlement of annual leave, public holiday and medical leave, overtime rate and etc were not outlined the employment contracts.</p> <ol style="list-style-type: none"> 1. I/C No.: 890323-06-52XX 2. I/C No.: 800131-03-53XX 3. I/C No.: 791201-06-52XX 4. I/C No.: 880508-06-57XX <p>No evidence of EPF, SOCSO and EIS contribution was made by the FFB Transporter for his workers. Interview with the FFB Transporter, Pacat Emas Enterprise Manager has confirmed that he did not make contribution of EPF, SOCSO and EIS</p>
<p>Corrections:</p>	<p><u>Kerdau POM</u></p> <ol style="list-style-type: none"> 1. To request SS Naveen Engineering to amend the respective clauses accordingly. 2. To advise SS Naveen to terminate the said worker with immediate effect. <p><u>Chenor Estate</u></p> <ol style="list-style-type: none"> 1. To request the contractor to revise employment contract to their worker to include terms and conditions as per Employment Act 1955 requirement. 2. To issue warning letter to the said contractor for breaching of contract on the non-compliance to legal requirement. <p>To advise Pacat Emas Enterprise to initiate the registration of EPF, SOCOS and EIS soonest as possible.</p>
<p>Root Cause Analysis:</p>	<p>Legal due diligence for contractor was not effectively monitored.</p>
<p>Corrective Actions:</p>	<ol style="list-style-type: none"> 1. To emphasize monitoring of compliance to legal requirement for the contractor and Management to ensure the compliance with Employment Act 1955 and other statutory deduction on monthly basis on all contractor’s document. 2. Warning letter will be issued should the contractor fail to comply to the legal requirement and breach the contract.
<p>Assessment Conclusion:</p>	<p>The corrective action plan is deemed to be sufficient to address the minor nonconformity raised. The effectiveness of the corrective action plan will be assessed during the next annual surveillance assessment.</p>
<p>Effectiveness Closure:</p>	<p>From the verification on SS Naven Engineering workers as per below:-</p> <ul style="list-style-type: none"> - Permit No. PE2569660, Passport No. BX0642498, Company: SS Naveen Engineering <p>The employment contract for this worker showed under 3.1 The workers will received a basic wages of RM 1,200.00 per month. And also under 16.1 The company will pay the cost of flight ticket from the Bangladeshi. Sighted no record of contractor in sample estate. Monitoring been conducted by the management to ensure the contractor comply with legal and other requirement including internal audit latest done for SOU 11 Kerdau Estate conducted on 8/3/2022. Mentakab Estate internal audit on 15/3/2022. Chenor Estate internal audit dated on 28/3/2022. Thus The Minor NC was closed on 15/4/2022</p>

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Non-conformity			
NCR Ref #	2043087-202104-N2	Issued Date	9/4/2021
Due Date	15/4/2022	Closure Date	15/4/2022
Indicator & Category (Critical / Minor)	3.3.2 Minor		
Statement of Nonconformity:	Implementations were not in accordance with the SOPs that were in place.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<p>Landfill Management In Estate Kerdau Estate</p> <p>The Operational Control Procedure for Landfill Management In Estate (SD/SDP/PSQM(ESH)203-EN7) dated 13th march 2017 states:</p> <p>1. Section 6 Requirements and Procedure; Section 6.4 Landfill Design Criteria; The landfill shall be designed in accordance with the following criteria; d) the entrance to the landfill site should be fenced and equipped with a signage as indicated below (minimum); "TEMPAT PELUPUSAN SAMPAH, DILARANG MEMBAKAR, TIADA BAHAN BUANGAN TERJADUAL"</p> <p>It was sighted that the landfill was not fenced and the signboard available only stated "Tempat Pelupusan Sampah" and did not state "Dilarang Membakar" and "Tiada Bahan Buangan Berjadual".</p> <p>2. Section 6.5 Landfill Operations; 6.5.6; Filling up the pit with MSW should be done as follows: a) To place "START" sign at the first section which is planned to be filled with MSW. Each Section is to be filled up to 80% capacity. b) the filled section should be backfilled with excavated soil and compacted before proceed to another section.</p> <p>It was sighted that there was no START sign at the area filled with MSW. The landfilled was filled up exceeding 100% and overflows to the ground. The filled section was not backfilled with excavated soil and compacted.</p> <p>Water Quality Management System Sime Darby Plantation; Plantation Quality Management System; Sustainable Plantation Management System; SOP for Water Quality Monitoring; 5.5 Evaluation of Laboratory Test Results.</p> <ul style="list-style-type: none"> - Upon receiving the complete results, the Head of Operating Unit shall check whether it exceeds, or no not meet the related requirement. If the results are off limit, an investigation shall be initiated to solve the issue. - Investigation shall be recorded in Corrective/Preventive Action Report for NonConforming Water Analysis Results. Refer Appendix H; Form Code WQ01/CPAR (1) to (3). - Arrangement for a re-sampling and analysis of the parameter of concern shall be done concurrently with the investigation and sent to the laboratory within 1 week of receiving the results. 		

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	<p><u>Kerdau POM</u></p> <ol style="list-style-type: none"> Based on the Drinking Water test report by Sime Darby Research Sdn. Bhd. (R&D Centre) dated 17/03/2021 (Test Report Number: IE301/2021) does not conform with NSDWQ for domestic use - pH 6.4 (Standard Quality – 6.6 – 9.0). Since the results of the drinking water analysis did not conform with the NSDWQ for domestic use the management has not arranged for resampling (exceeded 1 week) as stated in the Water Quality Monitoring SOP. Based on the Drinking Water test report by Sime Darby Research Sdn. Bhd. (R&D Centre) dated 12/03/2021 (Test Report Number: IE285/2021) does not conform with NSDWQ for domestic use - pH 6.4 (Standard Quality – 6.6 – 9.0). The results of the drinking water analysis did not conform with the NSDWQ for domestic use. The management did not conduct the evaluation of laboratory test results as stated in the Water Quality Monitoring SOP. <p><u>Sg. Mai Estate</u></p> <p>1. Based on the River Water Analysis Test Report by Sime Darby Research Sdn Bhd dated 16/03/2021 (Test Report Number: (IE291/2021) does not conform with Class IIA/IIB of NWQS for Natural Waterways – (Sample 2 – Outlet (COD - 52) and Sample 8 – Middle (COD – 44) where Standard Quality – 25). There was no investigation done and no resampling conducted for the nonconforming locations in accordance with the Water Quality monitoring SOP.</p>
Corrections:	<p><u>Kerdau Estate.</u></p> <ol style="list-style-type: none"> To erect fence and necessary signage ie 'Dilarang Membakar' and 'Tiada Bahan Buangan Berjadual' at the Landfill area. The pit will be backfilled with soil once it reaches up to 80% capacity. Result of water sampling result to be submitted to Sr Assistant and Manager for checking/verify. <p><u>Kerdau POM</u></p> <ol style="list-style-type: none"> To conduct resampling and evaluation for the drinking water accordingly. <p><u>Sg Mai Estate</u></p> <ol style="list-style-type: none"> An investigation has been carried out and already sent the water sample for analysis.
Root Cause Analysis:	The monitoring system on the SOP implementation is not effective.
Corrective Actions:	<ol style="list-style-type: none"> To conduct refresher training on operation and non-operational SOP to the respective personnel and person in-change. <p>To monitor the effectiveness of such training thru internal audit.</p>
Assessment Conclusion:	The corrective action plan is deemed to be sufficient to address the minor nonconformity raised. The effectiveness of the corrective action plan will be assessed during the next annual surveillance assessment.
Effectiveness Closure:	Visits to the estates confirmed and verified the following details;

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	<p>Kerdau Estate.</p> <p>a) To erect fence and necessary signage ie 'Dilarang Membakar' and 'Tiada Bahan Buangan Berjadual' at the Landfill area. The pit will be backfilled with soil once it reaches up to 80% capacity. Kerdau Estates and Mill initiated disposed domestic wastes to Majlis Perbandaran Temerloh tapak perlupusan sanitari belengu halt effective Mac 2022. Evidences of collection were verified through the payment made to the e.g bill no B 0050048 dated 15/03/2022. The estate former land sites were covered with soil and leveled and maintained clean.</p> <p>b) Result of water sampling result to be submitted to Sr Assistant and Manager for checking/verify. This is being complied with the scheduled water sampling to the SDP Research Centre. All results were verified by the Assistant with onward approval by the Sr Manager.</p> <p>Kerdau POM</p> <p>a) To conduct resampling and evaluation for the drinking water accordingly. - All off spec results were investigated and remedial action taken appropriately with final endorsement by the Mill Senior Manager</p> <p>Sg Mai Estate</p> <p>a. An investigation has been carried out and already sent the water sample for analysis dated resampling 14/03/2022. - Effective Sept 2021 the estate has converted to PAIP water supply</p> <p>b. To conduct refresher training on operation and non-operational SOP to the respective personnel and person in-charge. - Records of training verified through the training records. Respective training being made accordingly and mostly during the morning muster and at the fields on ad-hoc basis.</p> <p>c. To monitor the effectiveness of such training thru internal audit. - Internal audits personnel included this in the audit plan.</p> <p>Thus The Minor NC was closed on 15/4/2022</p>
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Non-conformity			
NCR Ref #	2043087-202104-N3	Issued Date	9/4/2021
Due Date	15/4/2022	Closure Date	15/4/2022
Indicator & Category (Critical / Minor)	7.11.3 Minor		
Statement of Nonconformity:	The estates have yet to engage with the listed adjacent stakeholders on fire prevention and control measures.		
Requirement Reference:	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.		
Objective Evidence:	<p>The estates have yet to engage with the sampled adjacent stakeholders on fire prevention and control measures as mentioned below:</p> <p><u>Kerdau Estate</u></p> <ol style="list-style-type: none"> 1. FELCRA Kerdau 2. Felda Jenderak 		

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	<p>3. Krau Forest Reserve (Jabatan Perhutanan)</p> <p><u>Chenor Estate</u></p> <ol style="list-style-type: none"> 1. Smallholders adjacent to Chenor Estate 2. Felda Ulu Jempol 3. Forest Reserve (Jabatan Perhutanan) <p><u>Mentakab Estate</u></p> <ol style="list-style-type: none"> 1. Ladang Sg Kawang (KLK) 2. Kg. Sementeh 3. SMGB Group Sdn Bhd <p>During the field visit to the estates it was identified that there were more adjacent stakeholders that have not been identified and included in the stakeholder list.</p>
Corrections:	<p><u>Chenor Estate</u></p> <p>Identified and the stakeholder list has been updated to include all stakeholder surrounding by estate.</p> <p><u>Kerdau Estate & Mentakab Estate</u></p> <p>To include meeting agenda in the next invitation letter to the adjacent stakeholder and encourage them to join the discussion or meeting for the benefit of all.</p>
Root Cause Analysis:	<ol style="list-style-type: none"> 1. The mechanism to identify stakeholder adjacent to the operation is not sufficient. 2. The stakeholder is not well-informed on the agenda of the stakeholder meeting
Corrective Actions:	<ol style="list-style-type: none"> 1. To include the agenda as per RSPO requirement in the stakeholder invitation letter. 2. To diversify the platform to engage and communicate with the stakeholder on the fire prevention and control measure especially for the adjacent stakeholder. E.g. telephone call, e-mail etc.
Assessment Conclusion:	<p>The corrective action plan is deemed to be sufficient to address the minor nonconformity raised. The effectiveness of the corrective action plan will be assessed during the next annual surveillance assessment.</p>
Effectiveness Closure:	<p>Visits to the estates confirmed and verified the following details;</p> <p>Both the estates and the mill in SOU 11 held engagement with the adjacent stakeholders via briefing sessions as stated in ERP procedure Fire Prevention Control Measures Sime Darby Plantation / Kertas Kerja Program Simulasi Kebakaran at respective dates and Fire Prevention and Control Measure. Therein containing</p> <ol 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. The recent being on the following through correspondence made to all stakeholders informing on the compliance to RSPO/ISCC/MSPO/SCCS in accordance with SDP MQMS/EQMS. This is inclusive on the fire prevention and control measures akin to the earlier</p>

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	<p>session in meetings. There were also cases of non-presence of invitees of the adjacent stakeholders whereby they will be communicated in writing. There was no live consultation in 2020 / 2021 at certain OU due to MCO restriction.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>Estate / Mill</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kerdau Estate</td> <td>04/1/22</td> <td>08/10/20</td> </tr> <tr> <td>2</td> <td>Mentakab Estate</td> <td>11/02/22</td> <td>26/03/21</td> </tr> <tr> <td>3</td> <td>Chenor Estate</td> <td>30/03/22</td> <td>26/01/21</td> </tr> <tr> <td>4</td> <td>Sg Mai Estate</td> <td>07/03/22</td> <td>2/03/21</td> </tr> <tr> <td>5</td> <td>Kerdau POM</td> <td>24/01/22</td> <td>08/10/20</td> </tr> </tbody> </table> <p>Thus Minor NC was close on 15/4/2022.</p>		Estate / Mill	Date	Date	1	Kerdau Estate	04/1/22	08/10/20	2	Mentakab Estate	11/02/22	26/03/21	3	Chenor Estate	30/03/22	26/01/21	4	Sg Mai Estate	07/03/22	2/03/21	5	Kerdau POM	24/01/22	08/10/20
	Estate / Mill	Date	Date																						
1	Kerdau Estate	04/1/22	08/10/20																						
2	Mentakab Estate	11/02/22	26/03/21																						
3	Chenor Estate	30/03/22	26/01/21																						
4	Sg Mai Estate	07/03/22	2/03/21																						
5	Kerdau POM	24/01/22	08/10/20																						

Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement: Nil</p> <p>Verification / Follow-up actions:</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2019.01	Minor	4.75	12/04/2019	Closed (14.06.2019)
2019.02	Major	5.7.2	12/04/2019	Closed (20.05.2019)
2020.01	Minor	7.3.1	02/04/2020	Escalated to 'Critical' due to Reoccurrence of Minor Non-Conformity
2043087-202104-M1	Critical	7.3.1	09/04/2021	Closed (25/06/2021)
2043087-202104-M2	Critical	6.2.3	09/04/2021	Closed (25/06/2021)
2043087-202104-M3	Critical	3.6.2	09/04/2021	Closed (25/06/2021)
2043087-202104-M4	Critical	6.7.3	09/04/2021	Closed (25/06/2021)
2043087-202104-N1	Minor	2.2.2	09/04/2021	Closed (15/04/2022)
2043087-202104-N2	Minor	3.3.2	09/04/2021	Closed (15/04/2022)
2043087-202104-N3	Minor	7.11.3	09/04/2021	Closed (15/04/2022)
2187928-202204-M1	Critical	3.7.1	15/04/2022	Closed (02/07/2022)

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss *SOU11 Kerdu POM 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)
Contractors	Triang Long Enterprise	face to face interview
Communities	Kampung Sungai Buloh – Village Head	face to face interview
Communities	SJKT Ladang Mentakab	face to face interview
Communities	Estate Medical Assistant (MA)	face to face interview
Contractors	Syarikat Mohd Affendi	face to face interview
FFB Supplier	En Mohd Noor Azhaar Amir	face to face interview
Internal	NUPW representative	face to face interview
Internal	Gender representative	face to face interview

Stakeholders comment	
1	<p>Feedbacks: Local Village Representatives Both mill and estate management always helpful and contributed a lot to local villagers. Contributions including food basket to Covid-19 quarantined families and recently house cleaning with foods and clothes to families affected by flood.</p> <p>Audit Team verification and response: No further issue</p>
2	<p>Feedbacks: Estate supplier & shop keeper No issue in contractual matters since company always give priority to locals and/or long-served contractor to provide service/contract work. Contract pricing fair to both parties for direct award contract unless involve tendering that need to be negotiated. Nevertheless, negotiated price for specific contract/tender work if awarded still fair to both parties.</p>

	<p>Audit Team verification and response: No further issue.</p>
3	<p>Feedbacks: Local workers & foreign workers NUPW representatives No restrictions by management to all mill and estate employees to join union. Almost all local workers associated with NUPW while more than 50% foreign workers become member. Required fees paid by company with no issue.</p> <p>Audit Team verification and response: No further issue.</p>
4	<p>Feedbacks: Gender committee representatives No new mothers at any of the Estates and Mill within SOU 11. In case of any, the committee representative will take actions to address any needs that have been identified.</p> <p>Audit Team verification and response: No further issue.</p>
5	<p>Feedbacks: Estate Medical Assistant (MA) Issue related to Covid-19 pandemic was handled well by management and all personnel. No serious positive case. No other viral case occurred since last audit.</p> <p>Audit Team verification and response: No further issue</p>

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
Nil					
Not Applicable as SOU 11 Kerdu Certification Unit has undergone its 2nd Cycle of Replanting. Sime Darby previously acquired all the land from Austral Plantation.					

Previous land owner / user comment	
<p>Feedbacks: Not Applicable as SOU 11 Kerdu Certification Unit has undergone its 2nd Cycle of Replanting. Sime Darby previously acquired all the land from Austral Plantation.</p>	<p>Audit Team verification and response: Nil</p>

3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that SOU Kerdu 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 SOU Kerdu and Supply Base is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Muhamad Naquiddin Mazeli	Name: AZRI B. LAHMAN
Company Name: BSI Services (M) Sdn Bhd	Company Name: SIMZ DARBY PLANTATION BHD
Title: Lead Auditor	Title: SR. MANAGER
<p>Signature:</p> 	<p>Signature:</p> <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
Date: 26/7/2022	Date: 29/7/22

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Publicly available management documents such as land titles, OHS plans, EIA and SIA reports, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans are available. All operating units have individual documents and records to demonstrate compliance to this indicator. Sustainability Reports, policies and procedures are also accessible through the company's website: http://www.simedarbyplantation.com/</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>All the related information was in Bahasa Malaysia and English and accessible to the stakeholders upon request. Briefing among others were made during the respective stakeholders meeting. Requests on information are via letters /emails or through the meetings.</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 including housing workers repair requests as per Oil Palm Pal (OPP) Checklist for Kerdu Estate and Kerdu POM. Sighted latest request was received on 5/4/2022 by Kerdu POM house # WQ58. Request was responded by management on 6/4/2022 and repair completed on 10/4/2022. Sighted too in Mentakab Estate Lanchang Division records of requests by workers latest on 15/2/2022.</p>	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>Consultation and communication procedures established as the Flowchart and Procedure on Handling Social Issues; Appendix 5 of Sustainable Plantation Management System (SPMS); Version # 1; Issue date: 1/11/2008. Based on the procedure, latest consultation</p>	Complied

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	- Critical (Major) compliance -	with external stakeholders were conducted by SOU 11 on 4/3/2022 in Kerdau Estate Club House. Among stakeholders attended including authorities (KPNHEP), vendors (SST Hardware, Ani Orked etc.), schools (SK Kerdau, SJKT Ldg Sg Tekal etc.) and local communities (Kg Paya Rekoh). No negative feedbacks received from external stakeholders during the meeting. Chenor Estate conducted stakeholder consultation through email and letters dated 1/3/2022 attached with feedback form. Sighted too few feedback forms received from external stakeholders with no negative feedbacks.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	The latest Stakeholders Lists for all operating units within SOU 11 sighted available as updated on January 2022. Information of stakeholders' details available included person in charge, address, e-mail and contact number for various stakeholders' category among internal and external stakeholders including local communities, authorities, vendors and neighbours etc.	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	SOU 11 conducted the Contract Agreements & Payslip Requirement Briefing to all contractor and vendor on 2/3/2022 which also includes the acknowledgement of Sime Darby Plantation's Vendor Integrity Pledge (VIP) and Code of Business Conduct (COBC) by all contractors and vendors.	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Monitoring including internal audit latest done for SOU 11 Kerdau Estate conducted on 8/3/2022. Mentakab Estate internal audit on 15/3/2022. Chenor Estate internal audit dated on 28/3/2022.	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.			

<p>2.1.1</p>	<p>(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -</p>	<p>The Certification Unit continues its commitment in complying with all legal and applicable requirements. Among permits and licenses verified at the certification unit were:</p> <p>Kerdau Estate</p> <p>License for Diesel (12000L) KPDNHEP TLH 600-5/2/03/86 valid from 27/5/2021 until 26/5/2022.</p> <p>License for Diesel (10000L) KPDNHEP TLH 600-5/2/116/81 valid from 28/7/2021 until 27/7/2022.</p> <p>License for Petrol (200L) KPDNHEP/TLH/600-5/2/337/17(PK) valid from 7/2/2022 until 6/8/2022.</p> <p>MPOB License 524696002000 valid from 1/11/2021 until 31/10/2022</p> <p>Water source license (0091) from Water Source Department valid until 31/12/2021. The management already apply for new license on 13/12/2021 and still pending from government.</p> <p>Kerdau POM</p> <p>Noise Risk Assessment (PHK 1448) dated 11/3/2021 prepared by Mohd Rashid B.Hj Gelamdin from Procoma Environmental (M) Sdn Bhd</p> <p>MPOB license 540761004000 validity from 1/7/2021 until 30/6/2022</p> <p>Suruhanjaya (license no: 2021/03121) valid from 8/1/2022 until 7/1/2023.</p> <p>License for Diesel (25000L) KPDNHEP TLH 600-5/2/13/94 valid from 6/8/2021 until 5/8/2022.</p> <p>PH PMT 82447 air receiver tank valid until 18/4/2023</p> <p>PH PMT 4988 inclined steriliser valid until 18/4/2023</p> <p>Mentakab Estate</p>	<p>Complied</p>
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		<p>MPOB license 546148011000 valid from 1/2/2022 until 31/01/2023 License for water source (series no: 0154) valid from 1/1/2022 until 31/12/2022. License for Diesel (6000L) KPDNHEP TLH 600-5/2/324/81 valid from 2/7/2021 until 1/7/2022. PH PMT 3455 Horizontal Air Storage Tank valid until 2/5/2022</p> <p>Chenor Estate License for water source (series no: 0080) valid from 1/1/2022 until 31/12/2022. MPOB license 524796002000 valid from 1/12/2021 until 30/11/2022 License for Diesel (13,638L) KPDNHEP TLH 600-5/2/19/19 valid from 27/5/2021 until 26/5/2022.</p> <p>Sg Mai Estate MPOB License 524697002000 available valid from 1/11/2021 until 31/10/2022. MPOB license for Nursery 618686011000 was valid from 1/9/2021 until 31/8/2022. License for Diesel (22000L) PKPDNHEP.PHG.JRT.600-5/2/243 valid from 8/8/2021 until 7/8/2024. License for Petrol (25Liter/sehari) PKPDNHEP.PHG.JRT.600-5/2/103/11(PK) PD valid from 26/4/2021 until 25/4/2024. License for water source (series no: 0062) valid from 1/1/2022 until 31/12/2022.</p>	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	As per records of Sime Darby Plantation Berhad Estate/Mill – Upstream Malaysia Legal & Other Requirements Register (LORR) by Group Sustainability & Quality Management; Updated 5/7/2021.	Complied

	- Minor compliance -		
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>All legal boundaries were clearly demarcated and visibly maintained, and there was no planting beyond the legal boundaries. There are no changes as previous report as per below:-</p> <p>Kerdau POM</p> <p>The mill is located in the vicinity of Kerdau Estate. The land title for Kerdau Estate (H.S (D) Number: 5401; PT Number: PT 575; Hectarage of Land Title: 4856.232 Ha) was available for verification. The area surrounding the mill has been fenced to show the boundary of the mill with the estate.</p> <p>Kerdau Estate</p> <p>The boundaries at Kerdau Estate, Field P14D adjacent to the Forest Reserve were clearly demarcated with fences along the Krau Forest Reserve. Boundaries along the estate with FELDA Jenderak and FELCRA Kerdau were demarcated with security trenches to mark the legal boundaries. Boundary PEGS was available at Field 08B boundary with Felcra Kerdau (3.566561, 102.289733) and at Field 09A with Felcra Kerdau (3.557134, 102.302329).</p> <p>Mentakab Estate</p> <p>Visit along the estate boundary along Field 2020A and Sg Kawang Estate – KLK (3° 28' 43.0" N, 102° 10' 33.8" E) indicated the boundary were well maintained with security trenches. There were poles erected, painted with red and white stripes indicating the boundary of the estate.</p>	Complied
<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>The list of contracted parties available as per stakeholder list updated for year 2021 for each estate.</p>	Complied

2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>From the verification on SS Naven Engineering workers as per below:-</p> <ul style="list-style-type: none"> - Permit No. PE2569660, Passport No. BX0642498, Company: SS Naveen Engineering <p>The employment contract for this worker showed under 3.1 The workers will received a basic wages of RM 1,200.00 per month. And also under 16.1 The company will pay the cost of flight ticket from the Bangladeshi.</p>	Complied
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>The agreement sighted has the supplementary of 'Tatakakuan Perniagaan Vendor' dated 30 May 2018. Under clause 5.1 Peluang yang sama rata dan tiada diskriminasi' and 5.8 "Pemansuhan Buruh Kanak-Kanak & Melindungi Hak Kanak-Kanak".</p>	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>The mill received crop from the SDP estates, mainly from the Kerdu / Chenor / Mentakab / Sg Mai Estates, others if any are from diversion from the sister mill as results of breakdown or annual maintenance. All the estates from the same SOU 11 possessed the following information sighted and verified during the audit</p> <ul style="list-style-type: none"> a) All FFB from the SDP estates supported by the delivery documents. b) Valid land title with ownership status (refer indicator 4.4.1) c) Valid MPOB licence (refer criteria indicator 2.1.1) <p>All delivery documents were verified with volumes of FFB received by the mill. SOU 11 Kerdu POM receives RSPO Certified FFB from the 4 estates within the SOU 11 - Certification Unit and also diverted FFB from RSPO Certified Sime Darby Oil Mill such as Jabor POM and Bukit Puteri POM.</p>	Complied

		In addition the mill also receives Non RSPO Certified FFB from 8 - Collection Centres, 5 - smallholders and 2 - 3rd party Estates. The mill has obtained all the information required by the indicator for all active FFB Suppliers as verified during the audit.	
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1. - Minor compliance -	Kerdau Palm Oil Mill also receives Non RSPO Certified FFB from the following; a) 8 - Collection Centres, b) 5 - smallholders c) and 2 - 3rd party Estates. There were 8 indirectly sourced FFB and the mill is in the process of collecting the info described in 2.3.1.	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	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	Kerdau POM has established a forecast business plan for five financial years from FY 2022 until 2026 categorized as the 'MPLAN_2022' as a projection for the mill to run the operations. The Plan is reviewed on an annual basis. The plan covers the Mill Production (Mill Intake – Oil Palm, Production Crude Palm Oil, Production Palm Kernel, Total Palm Oil Extraction & Total Palm Kernel Extraction), Reception, Fruit Handling, Sterilization, Threshing, Pressing, Clarification, etc. The Supply Base Estates have established and implemented its commitment to long-term sustainability and improvements through the MPLAN_2022 (Ex-estate Cost, Admin Paid by HQ and Depreciation). The MPlan Forecast projects the Crop – Oil Palm, CPO, PK, OER, KER, YPH, Direct Cost and Fixed Cost.	Complied

<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -</p>	<p>The replanting program (LRRP) projected for the next 10 years was available at the estates assessed. The annual replanting program sampled for 5 years as shown in table below:-</p> <table border="1" data-bbox="1106 459 1944 799"> <thead> <tr> <th>Year</th> <th>Kerdau Estate</th> <th>Mentakab Estate</th> <th>Chenor Estate</th> <th>Sg Mai Estate</th> </tr> </thead> <tbody> <tr> <td>2022/23</td> <td>117.29</td> <td>212.42</td> <td>193.10</td> <td>235.87</td> </tr> <tr> <td>2023/24</td> <td>113.69</td> <td>139.56</td> <td>63.06</td> <td>150.15</td> </tr> <tr> <td>2024/25</td> <td>102.01</td> <td>133.47</td> <td>82.98</td> <td>199.84</td> </tr> <tr> <td>2025/26</td> <td>172.99</td> <td>152.34</td> <td>95.38</td> <td>195.39</td> </tr> <tr> <td>2026/27</td> <td>150.23</td> <td>144.36</td> <td>84.31</td> <td>246.56</td> </tr> </tbody> </table>	Year	Kerdau Estate	Mentakab Estate	Chenor Estate	Sg Mai Estate	2022/23	117.29	212.42	193.10	235.87	2023/24	113.69	139.56	63.06	150.15	2024/25	102.01	133.47	82.98	199.84	2025/26	172.99	152.34	95.38	195.39	2026/27	150.23	144.36	84.31	246.56	<p>Complied</p>
Year	Kerdau Estate	Mentakab Estate	Chenor Estate	Sg Mai Estate																													
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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>SOU 11 Operating Units held management reviews at their respective sites on a yearly basis. Among the matters discussed during the management review are as follows: -</p> <ol style="list-style-type: none"> 1. Results of Internal Audit 2. Customer Feedback 3. Status of preventive and corrective action plans 4. Follow Up actions for management reviews 5. Changes that could affect the management system 6. Recommendations for improvement <p>The minutes of meeting indicated that Internal audit findings were each thoroughly examined, and the corrective action plan were discussed. The management review was conducted at the respective operating units as follows:</p> <ol style="list-style-type: none"> i Kerdau POM: 1/4/2022 ii Kerdau Estate: 8&14/3/2022 iii Sg Mai Estate: 29/3/2022 iv Chenor Estate: 28/3/2022 	<p>Complied</p>																														

Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.		
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The continual improvement plans were established. The documents were being maintained and updated with the assistance and guide from Sustainability Department. SDP is committed to utilise the established system to regularly monitor and review their key activities at the mill and estates. Relevant action plans were initiated to continuously improve its key areas of operations, environmental, safety, health and welfare of the workers as well as social contribution to the community. Among others the continual improvement plans reviewed were:</p> <ul style="list-style-type: none"> a) Pollution Prevention Plan – 2022. b) Identification and Management of Wastewater – 2022. c) Waste Management Plan – 2022. d) Environmental Improvement Plan - 2022. e) Water reduction Plan - 2022. f) Safety and Health Program - 2022 <p>In Kerbau CU the yield performance, extraction ratios and production costs have always been in utmost priority in ensuring long-term economic and financial viability. In general, various efforts had been made to optimize the yield of the plantation among others;</p> <ul style="list-style-type: none"> a) maximizing crop recovery, optimum ripeness b) standard (harvest ripe bunches only and 100% loose fruit collection), c) the soil fertility was maintained and planting only high yielding planting material. d) To mechanize operation where feasible to reduce reliance of labour.

Complied

3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>The RSPO metric template version 2.1 was available. The data was accurate as per verification on estate and mill's record such as fertiliser bin card, JKKP record, grievances record and etc.</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>Applicable Standard Operating Procedures (SOP) has been established accordingly for Kerdu POM & Supply Base. E.g. for mill the Group Sustainability & Quality Management (GSQM) Standard Operating Procedure been established accordingly e.g. FFB Grading at Mill (Doc. No. SDP/GQSM/FFBG/SOP, Version 1, Rev. 0, date: 01/02/2019), Structured Oil Recovery Assessment (SORA) (Doc. No. SDP/GQSM/SORASOP/01, Version: 1, Rev. 0, date: 7/01/2019), other mill SOP reviewed includes Mill Quality Management System SOP issue date: 01/11/2008 for e.g. reception station, fruit handling station, sterilization station, threshing station, pressing station, clarification station, depericarping station, kernel recovery station. As for estates respective workplace related Safety Operation Procedures has been established accordingly e.g. at Sungai Mai</p> <p>Estate - harvesting (Doc. No. SME/SOP/005), loose fruit collection (Doc. No. SME/SOP/007), spraying (Doc. No. SME/SOP/011), rat baiting (Doc. No. SME/SOP/012), palm circle raking (Doc. No. SME/SOP/013) and Manuring (Doc. No. SME/SOP/004).The SOP copies</p>	Complied

		<p>were available at point of use in the Mill office and estates with latest revision status.</p> <p>Besides the above, the estates also referencing to Sime Darby Agricultural Reference Manual – Oil Palm Planting (Issue No.1, Year 2011, Version: 3, Issue date: 1/07/2011) as part of good agriculture practices. Among the subjects in this manual includes:</p> <p>Section 1. Planting Material, Section 2. Nursery Techniques, Section 3. Replanting, Section 4. Land Preparation, Section 5. Planting Density, Section 6. Maturity Age, Section 7. Field Upkeep.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>Kerdau POM & Supply Base have a mechanism to check consistent implementation of procedures through periodical internal audit by SQM Malaysia & Central East RSQM team. Non-compliances recorded with regards to applicable P&C 2018 indicators have been identified & closed accordingly. The mechanism of checking the consistent implementation was mainly carried out through field supervision by field staff, executive and managers. Sampling on mechanism of implementation procedure for housing inspection as per below:-</p> <p>Kerdau Estate:</p> <p>Latest housing inspections as per records of inspection form i.e. Housing Complex/NEST/Community Hall Inspections (PIOA-EWC) was on 7/4/2022; Total score: 98%. Previous inspection was conducted on 31/3/2022 and 24/3/2022</p> <p>However, provision of amenities including sundry shop, canteen & motorcycle workshop within Kerdau Estate workers housing area could be observe further mainly on the upkeeping of the building and its surrounding. Hence, an OFI has been raised on the matter.</p> <p>Kerdau POM:</p>	Complied

		<p>Latest housing inspections as per records of inspection form i.e. Housing Complex/NEST/Community Hall Inspections (PIOA- EWC) was on 5/4/2022; Total score: 93%. Previous inspection was conducted on 25/3/2022 and 16/3/2022</p> <p>Mentakab Estate: Latest housing inspections (PIOA) conducted on 9/4/2022. EWC was on 15/2/2022.</p> <p>Sungai Mai Estate: Latest housing inspections (PIOA) conducted on 9/4/2022. Previous inspection was on 2/4/2022.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Records of monitoring with regards to RSPO implementation are maintained and available for verification. Sample as per below:-</p> <ul style="list-style-type: none"> - Internal Audit in Kerbau estate dated 14/3/2022. This audit conducted by sustainability. - Soil analysis (S29/2019) conducted by Sime Darby Research Sdn Bhd dated 4/4/2019. - Agronomist report dated 5/4/2021 for period July 2021- June 2022. From the observations the nitrogen leaf level has improved with and estate average of 2.69% compared to 2.57% previously. Half of the manuring blocks sampled recorded adequate N Leaf level while only 3 block in Field 2017B, C and 2019B were under the low category. 	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>			

<p>3.4.1</p>	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -</p>	<p>There are no new plantings or operations within SOU 11 Kerdau CU. 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 person-incharge of the</p> <p>Programs which were established upon review of the aspect and impact register. It was observed that the reviewing and updating on the registers were made annually if there's no any new activity within respective sites.</p> <table border="1" data-bbox="1115 1246 1865 1382"> <thead> <tr> <th colspan="2">Kerdau POM</th> <th colspan="2">Details</th> </tr> <tr> <th>Date</th> <th>Activities</th> <th colspan="2">Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2022</td> <td>Operation</td> <td>New steam turbine 1600kW RM1M</td> </tr> </tbody> </table>	Kerdau POM		Details		Date	Activities	Description		1	2022	Operation	New steam turbine 1600kW RM1M	<p>Complied</p>
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		2	2022	Environmental	New EFB yard RM1M
		3	2022	Environmental	Acoustic Room - Engine Room RM80K
		4	2022	Safety	Workers houses rewiring RM230K
		5	2022	Environmental	POME land application RM800K
		6	2025	Environmental	Biogas Plant 2025 RM2M
		7	2023	Environmental	SORSS - Oil recovery system 2023
		Sg Mai Estate			
		22-24		Welfare	30 units workers qtrs upgrading RM2M
		2022		Welfare	Fencing at playground RM40K
		2022		Operations	1 Tractor FFB mechanization RM110K
		Kerdau Estate			
		1	2025	Operation	Expansion mist blower coverage 3 units
		2	2022	Operation	Mechanised spraying 1 RM25K
		3	2022	Operation	Mechanised fertilizer 10 units RM145K
		4	2022	Operation	3 units grabber FFB collection RM180K
		5	2025	Operation	MB sprayer 4 units RM133K
		Mentakab Estate			
		1	2023	Safety	Lightning arrestor - building RM40K
		2	2022	Welfare	Workers 143 unit replanting RM215
		3	22-25	Welfare	Upgrading workers qtrs 1 room RM670K

		<table border="1"> <tr> <td>4</td> <td>2022</td> <td>Welfare</td> <td>JBA supply installation RM640K</td> </tr> <tr> <td>5</td> <td>22/23</td> <td>Safety</td> <td>Field bridges 4 points - RM600K</td> </tr> <tr> <td>6</td> <td>2022</td> <td>Operations</td> <td>Electric fencing RM170K - Main Div.</td> </tr> <tr> <td>7</td> <td>2025</td> <td>Welfare</td> <td>Premix road - RM 712K - Main Div</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td>Chenor Estate</td> <td></td> </tr> <tr> <td>1</td> <td>2022</td> <td>Operations</td> <td>Mechanised fertilizer 2 units RM70K</td> </tr> <tr> <td>2</td> <td>23-26</td> <td>Welfare</td> <td>Workers 58 unit new units RM500K</td> </tr> <tr> <td>3</td> <td>2022</td> <td>Operations</td> <td>Mechanised FFB collection RM47K</td> </tr> </table>	4	2022	Welfare	JBA supply installation RM640K	5	22/23	Safety	Field bridges 4 points - RM600K	6	2022	Operations	Electric fencing RM170K - Main Div.	7	2025	Welfare	Premix road - RM 712K - Main Div							Chenor Estate		1	2022	Operations	Mechanised fertilizer 2 units RM70K	2	23-26	Welfare	Workers 58 unit new units RM500K	3	2022	Operations	Mechanised FFB collection RM47K	
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<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>SOU 11 Kerdu has a separate Social Impact Assessment (SIA) and Environmental Impact Assessment reports. Therein describing the objectives, category, action, frequency, person in charge and monitoring period.</p> <p>Among others as summarised below:</p> <p>a) To ensure compliance to SOP and legal requirement regarding social (appointment of person in charge/committee to handle social matters, communication on policies/SOP on social to relevant stakeholders, monitoring of pay and agreement of workers and contractor’s workers and to maintain housing and facilities provided to workers). based on inputs received from external stakeholders during stakeholder meetings, union meetings, JCC meetings, and Gender Committee</p> <p>b) To contribute to local communities development based on inputs received from external stakeholders during stakeholder meetings, union meetings, JCC meetings, and Gender Committee meetings.</p>	<p>Complied</p>																																				

3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</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 of the following;</p> <p>a) Gender Committee, NUPW, b) Safety Meeting, c) Complaint & Request from internal & external stakeholder and muster briefing). d) Stakeholders meeting</p> <table border="1" data-bbox="1111 715 1742 946"> <thead> <tr> <th></th> <th>OU</th> <th>Review</th> <th>Updates</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>KPOM</td> <td>10/01/2022</td> <td>Nil - No new operations</td> </tr> <tr> <td>2</td> <td>Chenor</td> <td>04/01/2022</td> <td>Nil - No new operations</td> </tr> <tr> <td>3</td> <td>Sg Mai</td> <td>26/01/2022</td> <td>Nil - No new operations</td> </tr> <tr> <td>4</td> <td>Kerdau</td> <td>13/1/2022</td> <td>Nil - No new operations</td> </tr> <tr> <td>5</td> <td>Mentakab</td> <td>26/01/2022</td> <td>Nil - No new operations</td> </tr> </tbody> </table>		OU	Review	Updates	1	KPOM	10/01/2022	Nil - No new operations	2	Chenor	04/01/2022	Nil - No new operations	3	Sg Mai	26/01/2022	Nil - No new operations	4	Kerdau	13/1/2022	Nil - No new operations	5	Mentakab	26/01/2022	Nil - No new operations	Complied
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Criterion 3.5: A system for managing human resources is in place.																											
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>Employment procedures established as following:</p> <ul style="list-style-type: none"> - Sime Darby Plantation Berhad Migrant Worker Responsible Recruitment Procedure; Version # 1; Effective date: 20/8/2021 - Standard Operating Procedure Title: Hiring of Local Workers; Doc. # 01-12-19; Rev. # 1; Effective date: 1/12/2019. <p>Sime Darby Plantation launched a <i>Program Jelajah Prihatin</i> in promoting job vacancy within estate and mill. Among positions offered including Harvesting Specialist, Technical Assistant and Agri-commodity Operator etc.</p>	Complied																								
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p>	<p>Employment procedures are well implemented with records well maintained as per information reported in indicator 6.1.1 to 6.6.2</p>	Complied																								

	- Minor Compliance -	below and sample Mentakab Estate New Workers Induction Training dated on 1/4/2022. Vacancy advertisement banner was displayed at strategic location in nearby community location on 9/4/2022.	
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>At the estates, among the HIRARC carried out covered sampled activities like Welding, Manuring, Harvesting, Store, Census, Drainage, Sanitation and Transporting Workers. HIRARC been reviewed at least once a year or whenever there is change in activity/process and any accident occurrence. Sampled HIRARC reviewed dated Nov 2021 at Kerdau Estate.</p> <p>In Kerdau POM, CHRA was conducted on 11/06/2020 by DOSH registered assessor Reg. No. HQ/14/ASS/00/358. Recommendation action plan has been planned & executed progressively accordingly. OSH meeting in Kerdau POM conducted 3 month once as per legal requirement. The latest meeting was 18/2/2022 and previously was on 13/12/2021 and 26/11/2021.</p> <p>In Mentakab Estate, appointment letter for OSH was available dated 8/2/2022. The latest OSH meeting conducted was on 11/2/2022 attended by 25 people.</p> <p>In Chenor estate, the Baseline Noise Risk Assessment Report been conducted on 20/9/2021. This assessment was conducted SH Safety Consultancy Sdn Bhd from the report there are 4 place need to install hearing protection zone such as heavy vehicles, workshop, pump house and upkeep. Sampled CHRA assessment report No. HQ/14/ASS/00/000012020/15 dated 20/06/2020 at Chenor Estate conducted by DOSH registered assessor no. HQ/14/ASS/00/358. Based on the CHRA recommendation the Health Surveillance to be conducted on monthly basis by the Estate Health Assistant or Medical assistant (MA). Based on the monthly health surveillance report of sampled period January 2021 – March 2021 verified that no abnormality result</p>	Complied

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		<p>been identified and all pesticide workers i.e. mixing operator, sprayer and manurer were fit to work. As for workers exposed to Manganese fumes & organophosphate pesticide annual medical surveillance is required and conducted accordingly at all estates.</p> <p>There also have assess the hazard and risk foe chemical that been used refer as per CHRA (HQ/14/ASS/00/00001-2020/15 dated 20/6/2020. There also HIRARC been establish and review on 19/2/2022</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Kerdau Palm Oil Mill and Supply Base has maintained an approved Health and Safety Policy signed by top management that is displayed prominently on notice boards in English/Bahasa Malaysia. Safety & Health Management Plan was available accordingly. The effectiveness of H&S plan was verified as per below record verification:-</p> <p>As per legal application in H&S plan, the Noise Risk Assessment Report conducted by SH Safety Consultancy Sdn Bhd dated 21/9/2021 (HQ/09/PEB/00/97). From the recommendation the signage need to be displayed at Heavy Vehicles, Workshop, Pump house and upkeep (grass cutting and blower). From the site verification the signage was available and maintain in good condition accordingly. Audiometric test as per recommendation only for heavy tractor, the management already send 30 driver to the Best Hearing Aid Centre Sdn Bhd dated 28/3/2022.</p> <p>The other verification was on HIRARC in Kerdau estate dated 13/12/2021 covered under operation manuring, spraying (inter pump) and harvesting. The implementation was accordingly as per HIRARC such as PPE was available.</p> <p>CHRA for Kerdau estate, assessment by Azhar Hazardous Chemical Consultancy dated 11/6/2020. Report Ref no. HQ/14/ASS/00/00001-2020/11. From the recommendation in the CHRA, the Medical surveillance dated 7/2/2022 for manganese exposure and</p>	Complied

		Cholonesterase exposure was available. This assessment conducted at Klinik Sulaiman Temerloh (JKKP HQ/15/DOC/00/290). From the result, all workers was fit to works with chemical.	
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>Kerdau Palm Oil Mill and estates has established an annual training program with latest training program for year 2022 that covers all aspects of the RSPO Principles and Criteria. The training need and program was made available for verification at all visited sites. Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained e.g. in understanding of RSPO, Safety Data Sheet, safe working practices and the correct use of PPE.</p> <p>Found the Mill workers conducted the water boiler test at Boiler area and not conducted the test in Laboratories as per Mill Laboratory Operation and Test Methods dated 1/7/2018 stated under 1.1.3 To analyse the boiler water samples once a day or as many times required so that feed water treatment can be properly carried out to maintain the maximum efficiency of the boiler, and to report any abnormal result to the mill manager.</p> <p>Kerdau Estate From Pictorial Safety Standard 2008 under 8.3 labelling to followed as per CLASS reg. Found the use of mineral water bottle as chemical for pesticide application.</p> <p>Kerdau Mill Found analysis of the boiler water not conducted at Laboratories as per Oil Mill Laboratory Operation and Test Methods dated 1/7/2018</p>	Non-compliance

		<p>stated under 1.1.3 To analyse the boiler water samples once a day or as many times required so that feed water treatment can be properly carried out to maintain the maximum efficiency of the boiler, and to report any abnormal result to the mill manager.</p>	
<p>3.7.2</p>	<p>Records of training are maintained. - Minor Compliance -</p>	<p>Training records for employees available and maintained at the office in mill and estates. Records are verified on a sampling basis which covers all aspect of training and RSPO P&C 2018 requirement and sampled follows:</p> <p>Kerdau estate</p> <ul style="list-style-type: none"> a) COBC Training to workers dated 8/4/2022 attended by all workers b) ILO training dated 25/3/2022 c) Organisational Health Index (OHI) Pulse survey to the workers dated 25/3/2022 d) Briefing on Personal Hearing Protector dated 24/3/2022 e) Sexual harassment training by Gender dated 11/3/2022 f) Contractor & Vendor briefing on contract agreement and payslip requirement dated 2/3/2022 <p>Kerdau Mill</p> <ul style="list-style-type: none"> a) Hearing conservation training dated 7/4/2022 b) First Aid Training dated 30/3/2022 c) PPE Training dated 24/3/2022 d) Chemical Handling Training dated 24/3/2022 e) Steriliser safety training dated 25/1/2022 f) Impact assessment training dated 10/1/2022 <p>Mentakab Estate</p> <ul style="list-style-type: none"> a) First Aid Training dated 4/3/2022 b) Safety PPE Training dated 2/4/2022 	<p>Complied</p>

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		<ul style="list-style-type: none"> c) Manuring Training dated 31/3/2022 d) Fire Drill training dated 25/3/2021 e) Spraying training dated 12/11/2021 f) Scheduled Hearing conservation Training dated 24/3/2022 g) waste Training dated 21/3/2022 <p>Chenor Estate</p> <ul style="list-style-type: none"> a) Kick of Meeting for replanting dated 8/2/2022 b) Recycle waste Briefing dated 8/4/2022 c) Briefing Sime Darby Plantation Policies dated 8/4/2022 d) COBC training to workers dated 2/4/2022 e) Scheduled waste training dated 21/3/2022 f) Employment contract training dated 16/3/2022 g) Harvesting training dated 1/3/2022 	
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>SOU 11 Kerdu POM has conducted a RSPO SCCS Refresher training for the Management Staffs, Auxiliary Police (AP) and Weighbridge Operators, SCCS training for KKS Kerdu staff was on 1/4/2022.</p>	Complied
<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical ©. 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</p>	<p>Not applicable. Kerdu POM is under mass balance module.</p>	Not Applicable

	controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.		
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>	Kerdao Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. The figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year (forecast volume of Jul 2021 – April 2022). The actual tonnage produced from last audit date (Jul 2021 – April 2022) recorded annual surveillance report.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The registration of PalmTrace will be carried out by the Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace.	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>Procedure namely Sime Darby Plantation – Plantation Quality Management System – Sustainable Plantation Management System; Appendix 15; Standard Operating Procedure (SOP) for Sustainability Supply Chain and Traceability; Version 2; Issue no.: 5; Issue date: April 2019.</p> <p>The procedure was established which covers responsibility, reporting of certified CPO/PK, non-conformance material, FFB delivery Plantation</p>	Complied

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	<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. 	<p>to Mill, CPO/PK delivery Mill to customer, Record keeping, Training, Complaint Communication and Claim and etc.</p> <p>The management already appointed En Ahmad Husaini Harun (Sr. Assistant) dated 31/12/2021. From the interview with appointed person, this person able to demonstrate awareness of the mill's procedures for the implementation of this standard. The person also already attend training on SCCS dated 1/4/2022.</p> <p>Training on Summary of New Changes in Sustainability Supply Chain and Traceability SOP: Sustainable Plantation Management System (SPMS) – Appendix 15; Plantation Sustainability and Quality Management Department date: 13/01/2020 by RSQM Central East personals.</p>	
<p>3.8.6</p>	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports. 	<p>Internal audit conducted based on the SOP for Sustainable Supply Chain and Traceability of SPMS Appendix 15 (18: Internal Audit); Version 2; Issue # 5; Date: April 2019. The procedure conforms to the requirements in the RSPO SCCS.</p> <p>The latest Internal Audit for RSPO SCCS was done on 7 & 16/3/2022 conducted by RSQM Central East. The audit has raised 3 Major Nonconformities, 3 Minor Nonconformities. However, no nonconformity was raised against the RSPO SCCS requirements. All the nonconformity raised against the general RSPO P&C requirements as mentioned above were successfully addressed and closed as stated in the management review meeting minutes dated 01/04/2021.</p>	<p>Complied</p>
<p>3.8.7</p>	<p>Purchasing and Goods In</p>	<p>The daily records are prepared at the entry point at the weighbridge. When FFB delivered to the mill from the FFB suppliers, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in order</p>	<p>Complied</p>

	<p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>the FFB to be received by the mill. Daily summary and monthly summary documented for all the certified FFB and non-certified FFB.</p> <p>The mill received FFB from sister estate with RSPO certified and purchased from the outside FFB suppliers. The records of FFB received was recorded in FFB delivery/consignment note, FFB weighbridge ticket and summarize in Mass Balance sheet.</p> <p>The management will inform CB if there is any overproduction of certified tonnage. They aware on the overproduction as per stated in the procedure. Based on last review period, no overproduction recorded.</p> <p>Addressed in the SOP clause 11.0 Non-conforming Products and/or Documents. Based on the procedure, where there is contamination of RSPO certified material during receiving, processing, storage and dispatch, the mill shall downgrade the materials in such order: IP to MB to conventional.</p> <p>Material received with insufficient information shall be treated as non-conforming documents. The documents shall be investigated, verified and corrected in order to allow processing of material. Authorization for release shall be by the mill manager.</p> <p>E.g. of information available in the mill's weighbridge tickets is as follows:</p> <p><u>Certified sample</u> SDP Sg Mai Estate - Date: 4/11/2022 - FFB Receive Ticket: 1689 - Product: 0001 – FFB A Crop - Lorry Number: VFM 5925 - Nett Weight: 15,670 kg</p>	
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		<ul style="list-style-type: none"> - RSPO Certificate No: RSPO 745399 SDP Chenor Estate - Date: 11/4/2022 - FFB Receive Ticket: 14753 - Product: 0001 – FFB A Crop - Lorry Number: CDS 9576 - Nett Weight: 23540 kg - RSPO Certificate No: RSPO 745399 Non Certified Desa Rimbunan Kaseh Sdn Bhd - Date: 11/4/2022 - FFB Receive Ticket: 268692 - Product: 0002 – FFB B Crop - Lorry Number: CBV 2554 - Nett Weight: 5930 kg 	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p>	<p>Kerdu POM ensured the required information is available in document form. Sampled of CPO contract: S/C-PSD/2106/CPO0061A Shipment period:23/6/2021 Order Quantity: 150mt Sampled the delivery of CPO for the mentioned contract.</p> <ul style="list-style-type: none"> - Customer: SDOPKR Sime Darby Plantation Berhad - Destination: Nuri Edible Oil (NEO) Complex - Seller: SDPB KKS Kerdu, Temerloh Pahang Darul Makmur. - Shipment/ delivery date: 23/06/2021 	Complied

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	<ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<ul style="list-style-type: none"> - Dispatch Ticket: 017711 - Documents Issued Date: 23/6/2021 - Product Description: RSPO CPO MB - Quantity of products delivered: 42,380 kg - Transporter: Nashreena - Supply chain certificate number of the seller: MUTU-RSPO-094 <p>PK contract: S/C-PSD/2112/PKL0114 Shipment period:10/2/2022 Order Quantity: 200mt</p> <p>Sampled the delivery of PK for the mentioned contract.</p> <ul style="list-style-type: none"> - Customer: SDO Carey KCP – SDP Nuri KCP (NK) - Destination: Kernel Crushing Plant – Pulau Carey - Seller: SDPB KKS Kerdu, Temerloh Pahang Darul Makmur. - Shipment/ delivery date: 31/12/2021 - Dispatch Ticket: 018468 - Documents Issued Date: 31/12/2021 - Product Description: Palm Kernel – RSPO MB - Quantity of products delivered: 41,390 kg - Transporter: By buyer – Aziz bin Musa - Supply chain certificate number of the seller: RSPO 745399 	
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: 	<p>SOU 11 Kerdu POM only outsources the transportation services of CPO. Nashreena International (M) Sdn Bhd is assigned to transport the CPO for Sime Darby Plantation in the from the selected oil mills which includes SOU 11 Kerdu POM. Sighted in the Contract Agreement on Transportation of Crude Palm Oil (CPO) (Services) for Sime Darby Plantation Berhad’s Peninsular Malaysia Oil Mills, between Sime Darby Plantation Berhad and Nashreena International (M) Sdn Bhd (Dated: 12/12/2020); Reference Number: T/SDPB/PEN/CPO/0720/003, stated</p>	Complied

	<p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>that the outsourced contractor shall comply with the General Chain of Customary requirements of the RSPO and the MSPO Supply Chain Standards (where applicable for the transporter) and permit the Certification Bodies (CB) appointed by the company to conduct audit on its or its sub-contractors' operations and provide access to all relevant systems, documents and records when requested by the CB. This contract was valid from 1/11/2020 until 31/10/2023.</p>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	The names and contact details of all contractors used for the physical handling of RSPO certified oil palm products were available in the mill. Among the detail recorded are: - Nashreena International (M) Sdn Bhd (CPO Transporter).	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	There were no new contractors used for the physical handling of RSPO certified products by the Mill.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory</p>	<p>Accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements available for verification. As spelt out in its supply chain procedure, Clause 5.4, records are to be maintained minimum of two years.</p> <p>For mass balance module;</p>	Complied

	<p>requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.</p>	<p>1. Receipt of RSPO certified FFB and deliveries of RSPO certified CPO and PK on three-monthly basis. Based on balance sheet closing March 2022, OER recorded at 19.06% and KER at 5.17%.</p> <p>2. Volume of certified CPO and PK delivered from the material accounting system according to actual production performance conversion ratios (OER and KER).</p> <p>3. Based on mass balance sheet (March 2022 closing), no negative stock recorded.</p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The oil extraction rate (OER) and the kernel extraction rate (KER) for Kerdu POM is determined and set their own extraction rates based upon past experience, documented and applied consistently.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Based on balance sheet closing March 2022, OER recorded at 19.06% and KER at 5.17%.</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</p>	<p>Not applicable due the Kerdu POM was Mass Balance Mill.</p>	Not Applicable

	palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.		
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Shipping Announcement in the RSPO IT platform carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not within three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. Sampling as per below;-</p> <p>CPO;- Transaction Id: TR-51b99be3-bd86 Creation: 14/7/2021 Confirmation; 23/7/2021</p> <p>PK;- Transaction Id: TR-51b99be3-bd86 Creation: 14/7/2021 Confirmation; 23/7/2021</p>	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	Claims are made through despatch documents. There are no on product claims and corporate claims identified.	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.	Not Applicable as corporate communication is managed at Sime Darby Plantation Berhad HQ level.	Not Applicable

4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member’s history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>	Not Applicable as corporate communication is managed at Sime Darby Plantation Berhad HQ level.	Not Applicable
4.3	<p>In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p>	Not Applicable as corporate communication is managed at Sime Darby Plantation Berhad HQ level.	Not Applicable
4.4	<p>Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.</p>	Not Applicable as corporate communication is managed at Sime Darby Plantation Berhad HQ level.	Not Applicable
4.5	<p>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.</p>	Not Applicable as corporate communication is managed at Sime Darby Plantation Berhad HQ level.	Not Applicable
Business to business communications			
5.1	<p>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.</p>	Not Applicable as corporate communication is managed at Sime Darby Plantation Berhad HQ level.	Not Applicable
5.2	<p>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.</p>	Not Applicable as corporate communication is managed at Sime Darby Plantation Berhad HQ level.	Not Applicable

5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	Not Applicable as corporate communication is managed at Sime Darby Plantation Berhad HQ level.	Not Applicable
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.	Not Applicable as the facility does not involve with consumer end product	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Not Applicable as the facility does not involve with consumer end product	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Not Applicable as the facility does not involve with consumer end product	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant’s RSPO membership status.	Not Applicable as the facility does not involve with consumer end product	Not Applicable

6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Not Applicable as the facility does not involve with consumer end product	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	Not Applicable as the facility does not involve with consumer end product	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Not Applicable as the facility does not involve with consumer end product	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org .	Not Applicable as the facility does not involve with consumer end product	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	Kerdau POM is producing CPO MB which 100% from MB certified portion.	Complied

	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>Kerdau POM only applies MB model and the conventional CPO are downgraded from MB whenever demanded.</p>	<p>Complied</p>
<p>Labelling and trademark (MB)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	<p>Kerdau POM only applies MB model and the conventional CPO are downgraded from MB whenever demanded. No RSPO trademark been used as per site interview and document review in Kerdau POM.</p>	<p>Complied</p>
<p>Messaging (MB)</p>			

	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>Kerdau POM only applies MB model and the conventional CPO are downgraded from MB whenever demanded. From the verification no storytelling in product related in Kerdau POM.</p>	<p>Complied</p>
<p>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>© A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 11 has implemented the Sime Darby's Human Rights Charter where they committed to recognizing the role of Human Rights Defenders in accordance to the United Nations declaration on Human Rights Defender.</p> <p>Communication workers were done during every to stakeholders in order for them to understand their responsibility in respect of human rights were conducted during latest consultation with external stakeholders were conducted by SOU 11 on 4/3/2022 in Kerdau Estate Club House. Among stakeholders attended including authorities (KPNHEP), vendors (SST Hardware, Ani Orked etc.), schools (SK Kerdau, SJKT Ldg Sg Tekal etc.) and local communities (Kg Paya</p>	<p>Complied</p>

		Rekoh). Chenor Estate conducted stakeholder consultation through email and letters dated 1/3/2022 attached with feedback form. Mentakab Estate conducted briefing of COBC and Human right SOP policies on 2/4/2022.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	Based on the interview of internal stakeholders among workers as well relevant external stakeholders, the mill and estates within SOU 11 do not instigate violence or use any form of harassment in their operations.	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	© The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Based on the records of complaints and grievances no issue of whistleblowing that requires anonymity of complainants and/or grievance parties. Interview conducted with internal stakeholders among workers and relevant external stakeholders also confirmed the information.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. Under Sime Darby website, there is Whistleblowing e-form provide a mechanism for reporting, investigating and remedying any wrongdoing.	Complied
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.	Neither any complaints nor land dispute occurred in the SOU 11 Certification Unit since the last audit.	Complied

	- Minor compliance -		
4.2.4	<p>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.</p> <p>- Minor compliance -</p>	<p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. 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.</p>	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Contributions made by both mill and estate as following:</p> <p>Kerdau Estate:</p> <ul style="list-style-type: none"> - School equipment for children of SJKT Ladang Sungai Tekal; Date: 25/2/2022 - Contributions to Kg Paya Taram villagers affected by flood; Date: 8/1/2022 - Cleaning of flooding affected area in Taman Wijaya, Karak; Date: 2/1/2022 <p>Mentakab Estate:</p> <ul style="list-style-type: none"> - Yayasan Sime Darby Disaster Relief Fund FY 2022 through Mentakab Estate for Taman Lanchang Indah, Kampung Rantau Panjang, Kampung Insaf, Kampung Sementah, Kampung Bongsu and Kampung Sungai Buloh etc. Flood Victims; Date: 6/1/2022 - Contributions to Kg Paya Taram villagers affected by flood; Date: 8/1/2022 <p>Chenor Estate:</p> <p>Contribution to Balai Polis Sungai Jerik community event dated 8-9/4/2022</p>	Complied

Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.		
4.4.1	<p>© Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Kerdao Estate hold a total of 7 land titles as per samples sighted as following:</p> <ul style="list-style-type: none"> - Land title #HSD 5401; Lot # PT 575; District: Temerloh; Sub-district: Mukim Kerdao; Area: 4,856.232 ha - Land title #GRN 7774; Lot # 1715; District: Temerloh; Sub-district: Mukim Jenderak; Area: 371.5944 ha - Land title #GRN 8529; Lot # 1879; District: Temerloh; Sub-district: Mukim Jenderak; Area: 89.486 ha <p>Mentakab Estate hold a total of 22 land titles as per samples sighted as following:</p> <ul style="list-style-type: none"> - Land title # 9269; Lot # 194; District: Temerloh; Sub-district: Mukim Mentakab; Area: 15.8586 ha - Land title # 9296; Lot # 1806; District: Temerloh; Sub-district: Mukim Semantan; Area: 2.5723 ha - Land title # 7315; Lot # 1193; District: Temerloh; Sub-district: Mukim Semantan; Area: 181.9059 ha <p>Chenor Estate hold a total of 3 land titles sighted as following:</p> <ul style="list-style-type: none"> - Land title # 720; Lot # 470; District: Maran; Sub-district: Mukim Chenor; Area: 116.0496 ha - Land title # 719; Lot # 469; District: Maran; Sub-district: Mukim Chenor; Area: 489.5646 ha - Land title # 5690; Lot # 3274; District: Maran; Sub-district: Mukim Chenor; Area: 1,394.1398 ha <p>Sungai Mai Estate hold a total of 8 land titles sighted as following:</p> <ul style="list-style-type: none"> - Land title # 9591; Lot # 746; District: Jerantut; Sub-district: Mukim Pedah; Area: 1.4999 ha
		Complied

		<ul style="list-style-type: none"> - Land title # 435; Lot # 796; District: Jerantut; Sub-district: Mukim Burau; Area: 339.5384 ha - Land title # 10387; Lot # 955; District: Jerantut; Sub-district: Mukim Pulau Tawar; Area: 248.2742 ha Land title # 5423; Lot # 1096; District: Temerloh; Sub-district: Mukim Jenderak; Area: 670.563 ha 	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	No issues of land dispute issue occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	No issues of land dispute issue occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	No issues of land dispute issue occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	No issues of land dispute issue occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied

4.4.3	<p>© 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>Boundary maps available for all estates within SOU 11 clearly demarcating estate area with location and coordinate of boundary stone and pegs.</p> <p>There is no land dispute recorded since last audit. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</p>	Complied
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>No issues of land dispute issue occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Not Applicable
4.4.5	<p>© Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>No issues of land dispute issue occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Not Applicable
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>No issues of land dispute issue occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Not Applicable
<p>Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>© Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.5.2	<p>© 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</p>	<p>No new planting and issues of customary land occurs in all estates within SOU 11 that requires FPIC process since the last audit.</p>	Complied

	<p>representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.5.6	<p>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.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied

4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.5.8	© New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new land acquired in areas inhabited by communities in voluntary isolation. Consultation with relevant stakeholders conducted on-site confirmed the information.	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	© A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.6.2	© A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	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>© A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.7.2	<p>© A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
<p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.8.2	<p>© 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</p>	<p>No new planting and issues of customary land occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied

	<p>case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>		
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>	<p>No new planting and issues of customary land occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.8.4	<p>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).</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within SOU 11 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	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	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>Prices paid for FFB are stated in the Schedule 3 of the Contract Agreement between SDP and the FFB Suppliers. All FFB suppliers have a copy of the contract agreement for their reference. Any discrepancies of weight or prices paid can be brought forward to the mill management through the grievance procedures that have been in place. Current and previous period prices are also publicly displayed at the weighbridge office for the reference of the FFB suppliers. MPOB Monthly Average and Mill OER & KER is used to determine the prices of FFB for payment to the FFB Suppliers</p>	Complied
5.1.2	<p>© 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).</p>	<p>This being made upon agreement signing and renewal to the suppliers and also during the stakeholders meetings.</p>	Complied

	- Critical (Major) compliance -	Nevertheless, the FFB suppliers understand the pricing of FFB which is in accordance to the MPOB Monthly Average for CPO and PK. Interview with the FFB Suppliers indicate that they are aware on the pricing mechanism of Kerdu POM.																					
5.1.3	© 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 -	Pricing is based on the MPOB Monthly Average Price for CPO and PK and the OER and KER awarded by Kerdu POM. This was affirmed by verifying the self billed invoice to the FFB Suppliers	Complied																				
5.1.4	© Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	There are no smallholders under the SOU 11 Kerdu certification unit as the estates that supply FFB to Kerdu POM are more than 50 Ha as defined RSPO MYNI 2019.	Complied																				
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	<p>SOU 11 – Kerdu POM ensures that all (OCP) Outsider FFB suppliers are provided with a fair, legal and transparent contract agreement. Sampled the contract agreement as below;</p> <table border="1"> <thead> <tr> <th></th> <th>Supplier</th> <th>Validity Period</th> <th>Contract No</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bakti Mas Sdn Bhd</td> <td>01/1/22-31/12/22</td> <td>P/P/1221/FFB0340 3L</td> </tr> <tr> <td>2</td> <td>Mohd Noor Azhaar</td> <td>01/1/22-31/12/22</td> <td>P/P/1221/FFB0341 5L</td> </tr> <tr> <td>3</td> <td>Sri Kerdu Com</td> <td>01/1/22-31/12/22</td> <td>P/P/1221/FFB0340 2L</td> </tr> <tr> <td>4</td> <td>Ambang Hijrah SB</td> <td>01/1/22-31/12/22</td> <td>P/P/1221/FFB0340 8L</td> </tr> </tbody> </table> <p>Among others terms and condition as follows; a) Delivery of FFB b) Transportation and unloading</p>		Supplier	Validity Period	Contract No	1	Bakti Mas Sdn Bhd	01/1/22-31/12/22	P/P/1221/FFB0340 3L	2	Mohd Noor Azhaar	01/1/22-31/12/22	P/P/1221/FFB0341 5L	3	Sri Kerdu Com	01/1/22-31/12/22	P/P/1221/FFB0340 2L	4	Ambang Hijrah SB	01/1/22-31/12/22	P/P/1221/FFB0340 8L	Complied
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		<ul style="list-style-type: none"> c) Quality of FFB / Origins of FFB d) Pricing of FFB e) Governing Law and Dispute Resolution f) Default and Termination 																
5.1.6	<p>© Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Kerdau POM ensures that all agreed payments to its Outsider FFB Suppliers are in a timely manner in accordance to the contract agreement which is on or before the 10th day of the following month. Payments are made every 30 days.</p>	Complied															
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>The Mill conducts regular calibration on their weighbridges used to determine the FFB tonnage for all FFB suppliers. There are 2 weighbridges used in the mill and records of yearly calibration for both weighbridges were available for verification calibrated by Metrology Corporation Malaysia Sdn Bhd as below:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>W/B</th> <th>Capacity</th> <th>Serial no</th> <th>Certificate no</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>70000kg</td> <td>B720142364</td> <td>DE18002741</td> <td>04/2/22</td> </tr> <tr> <td>2</td> <td>80000kg</td> <td>B226072085</td> <td>DE18008322</td> <td>04/2/22</td> </tr> </tbody> </table>	W/B	Capacity	Serial no	Certificate no	Date	1	70000kg	B720142364	DE18002741	04/2/22	2	80000kg	B226072085	DE18008322	04/2/22	Complied
W/B	Capacity	Serial no	Certificate no	Date														
1	70000kg	B720142364	DE18002741	04/2/22														
2	80000kg	B226072085	DE18008322	04/2/22														
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	<p>There are no smallholders under the SOU 11 Kerdau certification unit as the estates that supply FFB to Kerdau POM are more than 50 Ha as defined RSPO MYNI 2019.</p>	Not Applicable															
5.1.9	<p>© The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>There are no smallholders under the SOU 11 Kerdau certification unit as the estates that supply FFB to Kerdau POM are more than 50 Ha as defined RSPO MYNI 2019.</p>	Not Applicable															
<p>Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>																		

5.2.1	<p>The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>There are no smallholders under the SOU 11 Kerdu certification unit as the estates that supply FFB to Kerdu POM are more than 50 Ha as defined RSPO MYNI 2019</p> <p>However consultation are made normally through meeting e.g. Meeting with stakeholders and FFB suppliers of Kerdu Palm Oil Mill, recent held on 24/01/22 and 08/10/2020. Smallholders were invited to attend the stakeholder meeting for briefing on matters related to MSPO and RSPO certifications. Among others present as follows;</p> <ul style="list-style-type: none"> a) Ambang Hijrah Sdn Bhd b) SCL Commodities Sdn Bhd c) FELCRA Bhd - Kawasan Kerdu d) M/s Mohd Noor Azhaar Amir - Smallholders e) M/s Ismauyudin Abdullah - Smallholders 	Complied
5.2.2	<p>The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation as a group has developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified external suppliers.</p> <p>There are no smallholders under the SOU 11 Kerdu certification unit as the estates that supply FFB to Kerdu POM are more than 50 Ha as defined RSPO MYNI 2019.</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>Sime Darby Plantation as a group has developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p>	Complied

		As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.	
5.2.4	<p>© Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation as a group has developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers. As of current, no scheme smallholders program managed by Sime Darby Kerdu POM. Information of Sime Darby Plantation RSG programs available via official website.</p> <p>The outside crop suppliers being invited in the stakeholders meetings and briefing cum training are made in these sessions. Details as per minutes of meeting with the stakeholders.</p>	Complied
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation as a group has developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the FFB and CPO are sourced from identified, legal and responsible sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As of current, no group smallholders program is managed by Sime Darby Kerdu POM. Information of Sime Darby Plantation RSG programs are available via SDP website.</p> <p>There are no smallholders under the SOU 11 Kerdu certification unit as the estates that supply FFB to Kerdu POM are more than 50 Ha as defined RSPO MYNI 2019.</p>	Complied

Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	<p>© A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 11 has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 2nd December 2019. The policy shall be guided by the commitments spelt out in the Company's in Human Rights Charter (HRC) where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.</p>	Complied
6.1.2	<p>© Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Records of employments and interview conducted on-site with sampled internal and external stakeholders confirmed that the workers and groups including local communities, women, and migrant workers have not been discriminated against.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>No discrimination based on religion, gender, and nationality etc. during their recruitment. The recruitment process is based on skills, capabilities, and medical fitness necessary etc. This was confirmed from job vacancy advertisement and sample recruitment sighted.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Pregnancy testing was conducted only for women employee involved in chemical handling work to ensure no pregnant women working with the risk of chemical exposure. All women employees involved in chemical handling work within SOU 11 underwent Urine Pregnancy Test (UPT) conducted by respective estate's Hospital Assistant upon request only.</p>	Complied
6.1.5	<p>© 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>The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly and through</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability & Quality Management (PSQM) Department. It explained the types of gender-based violence & grievance procedures. Meetings were conducted quarterly according to the handbook. Gender Committee were established by the mill and estates management.</p> <p>Latest Kerdau POM Gender Committee Meeting was conducted on 3/3/2022 while in other operating units as following:</p> <ul style="list-style-type: none"> - Mentakab Estate on 10/3/2022. - Chenor Estate on 1/4/2022. <p>Sungai Mai Estate on 11/3/2022.</p>	
<p>6.1.6</p>	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>No discrimination based on religion, gender and nationality etc. during their recruitment. The recruitment process is based on skills, necessary capabilities, and medical fitness etc. This was confirmed during stakeholder's consultation, worker's interview, complaint book and trade union meeting.</p> <p>Sighted the job description of each workers mention the same regardless of skin colour, religion, race and caste. Evidence of equal pay sighted based on passports & work permit, work agreement, payslip, attendance & checkroll and Socso 8A form of May 2021, August 2021 & February 2022 for sample female and male employees as following:</p> <p>Kerdau POM:</p> <ul style="list-style-type: none"> - Employee # 23398; M; General - Employee # 23432; M; B Shift - Employee # 52228; M; General - Employee # 136473; F; General - Employee # 146935; F; Laboratory 	<p>Complied</p>

		<ul style="list-style-type: none"> - Employee # 156940; F; General - Employee # 162279; M; B Shift - Employee # 166790; M; B Shift <p>Kerdau Estate:</p> <ul style="list-style-type: none"> - Employee # 161368; F; Weighbridge Operator - Employee # 161454; F; General Worker - Employee # 163788; M; Field Worker - Employee # 163919; M; General Worker - Employee # 148125; M; FFB Carrier - Employee # 161366; M; Harvesting Mandore - Employee # 111140; M; FFB Cutter - Employee # 123359; M; Harvesting Mandore - Employee # 152186; M; FFB Carrier - Employee # 107570; M; Machine Operator <p>Mentakab Estate:</p> <ul style="list-style-type: none"> - Employee # 20806; F; Daily Rated or General Workers - Employee # 20808; F; Piece Rated Workers (Field Agrmnt) - Employee # 20816; F; Daily Rated Or General Workers - Employee # 29302; F; Daily Rated Or General Workers - Employee # 52085; M; Oil Palm Harvesters - Employee # 108293; M; Oil Palm Harvesters - Employee # 121310; M; Piece Rated Workers (Field Agrmnt) - Employee # 127902; M; Oil Palm Harvesters - Employee # 140311; M; Oil Palm Harvesters 	
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		<ul style="list-style-type: none"> - Employee # 160727; M; Daily Rated Or General Workers - Employee # 160764; F; Daily Rated Or General Workers - Employee # 166484; M; Daily Rated Or General Workers - Employee # 167964; M; Daily Rated Or General Workers <p>Chenor Estate:</p> <ul style="list-style-type: none"> - Employee # 20244; F; Daily Rated - Employee # 64811; M; Oil Palm Agreement - Employee # 108354; M; Daily Rated - Employee # 138344; F; Daily Rated - Employee # 138911; M; Piece Rated - Employee # 143615; F; Daily Rated - Employee # 149478; M; Oil Palm Agreement - Employee # 151475; M; Piece Rated - Employee # 154795; M; Piece Rated - Employee # 155537; F; Daily Rated <p>Sungai Mai Estate:</p> <ul style="list-style-type: none"> - Employee # 120181; M; Piece Rated Worker - Employee # 162943; M; FFB Cutter - Employee # 151922; M; Loose Fruit Collector - Employee # 152743; F; FFB Carrier - Employee # 153885; M; Field Worker - Employee # 96323; M; Piece Rated Worker - Employee # 21054; F; Gardener - Employee # 21070; F; Gardener 	
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		- Employee # 21118; M; FFB Cutter - Employee # 164985; F; Field Worker Employee # 167283; F; Field Worker	
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).			
6.2.1	© 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 -	Latest explanation on pay and conditions was conducted by Kerdu POM management to all workers during weekly assembly dated on 18/1/2022.	Complied
6.2.2	© Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members. - Critical (Major) compliance -	As per Inter-Office Mail from Sime Darby Plantation's Head, HR Upstream to Senior Managers/Managers Estate & Mill for all Northern Region, Central East Region, Central West Region on Implementation of Revised Workers' Contracts and Register of Maternity Leave and Allowances; Date: 3/12/2019. All workers work agreement were also based on MAPA Circular No. 1/2020; Date: 14/1/2020; Minimum Wages Order 2020 (MWO 2020) where the order provides for the minimum wages rates payable to an employee who works in a place of employment in any City Council or Municipal Council area as specified in the schedule.	Complied
6.2.3	© 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 -	Records of payslip and check-roll documents available to the workers for sample employees sighted as per indicator 6.1.6 above. Records shown all relevant legal compliance requirements were met by SOU 11.	Complied
6.2.4	© 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'	Kerdau Estate: Latest housing inspections as per records of inspection form i.e. Housing Complex/NEST/Community Hall Inspections (PIOA-EWC) was	OFI

	<p>Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>on 7/4/2022; Total score: 98%. Previous inspection was conducted on 31/3/2022 and 24/3/2022</p> <p>However, provision of amenities including sundry shop, canteen & motorcycle workshop within Kerdau Estate workers housing area could be observe further mainly on the upkeeping of the building and its surrounding. Hence, an OFI has been raised on the matter.</p> <p>Kerdau POM: Latest housing inspections as per records of inspection form i.e. Housing Complex/NEST/Community Hall Inspections (PIOA- EWC) was on 5/4/2022; Total score: 93%. Previous inspection was conducted on 25/3/2022 and 16/3/2022</p> <p>Mentakab Estate: Latest housing inspections (PIOA) conducted on 9/4/2022. EWC was on 15/2/2022.</p> <p>Sungai Mai Estate: Latest housing inspections (PIOA) conducted on 9/4/2022. Previous inspection was on 2/4/2022.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers’ access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Kerdau Estate including provision of sundry shop and canteen as per tenancy agreement as per sample:</p> <ul style="list-style-type: none"> - Tenancy Agreement (Shop No. 1 – Ladang Kerdau) Date: 1/1/2022 between Sime Darby Plantation Berhad Ladang Kerdau and Mohamad Asraf Afifi bin Kamarudin\ - Kerdau POM Tenancy Agreement with Sheimer Enterprise as Café Operator; Agreement period: 1/6/2021 – 31/5/2022. <p>Chenor Estate including provision of sundry shop and canteen as per tenancy agreement as per sample:</p>	Complied

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		Tenancy Agreement (Shop No. 2 – Ladang Chenor) Date: 1/2/2022 between Sime Darby Plantation Berhad Ladang Chenor and Ahmad Yusmita bin Abdul Rahman; Tenancy Period: 1/2/2022 – 31/1/2023	
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 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</i></p>	<p>In absence of DLW, SOU 11 conducted Prevailing Wage Assessment based on check roll worker for period of March 2022 and average check roll wages for period from Jan-Dec 2021. Denominator of total headcount Workforce: 976; Worker: 837; Local worker: 326; Foreign worker: 511. Based on the assessment, total received per month are as following:</p> <ul style="list-style-type: none"> - Local workers: RM 1,713.71 - Foreign workers: RM 1,674.88 	Complied

	<p>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). 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>Employment contracts detailing payments and conditions of employment available to the permanent workers employed as per samples sighted in indicator 6.2.2 above. No casual, temporary and day labour employed within all operating units within SOU 11.</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>© A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> - Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. - Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to 	Complied

		<p>bargain collectively.</p> <p>Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively and the workers have their freedom to join the NUPW/MAPA union.</p>	
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>Last meeting between management and NUPW representative in Kerbau Estate was conducted on 1/4/2021. On 1/1/2022, Kerbau Estate Senior Manager issued a statement on Freedom to Join Workers Union. The statement was signed by Senior Manager together with NUPW Chairman of Kerbau Estate.</p> <p>Kerbau POM management meeting with Workers' Union representatives was latest conducted on 15/3/2022, Mentakab Estate on 31/3/2022 and Chenor Estate on 17/12/2021 with minutes of meeting available been acknowledged by both parties.</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>Interview with workers union representatives (NUPW Chairman & NUPW Secretary) confirmed that they were independently elected as the NUPW by all members of NUPW among mill and estate workers via an election without interference by the management.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> - Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. - Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to 	Complied

		<p>bargain collectively.</p> <ul style="list-style-type: none"> - Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations. - Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the wellbeing of our communities. - Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognise that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use. - Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees. - Protecting the Rights of Children: We seek to promote the wellbeing of children, and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography. <p>Verification of workers master list confirmed that there is no child labour hired.</p> <p>For contractors, the abolishment of child labour & protecting the rights of children available in the Vendor COBC clause 5.8, Human Rights Charter-protecting the rights of children.</p>	
6.4.2	<p>© 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>The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liaison & Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause</p>	Complied

	- Critical (Major) compliance -	procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).	
6.4.3	© Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	Based on the interview and employees master lists data, no young person below 18 years old employed within all operating units within SOU 11.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	Interview conducted on-site with sampled internal and external stakeholders confirmed that the information on no child labour policy and the negative effects of child labour were provided in appropriate languages and accessible to them. Records of communication sighted available for communication with FFB Transporter sample Triang Leong Enterprise; Agreement # T/SDPB/PHG/FFB/0904/001; Ref.: FFB Transportation Service for Sime Darby Plantation Berhad in Pahang Estates; Date: 1/5/2022.	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	© A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below: We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to: - Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims. - Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation. The policy was communicated through the Gender Committee meeting conducted quarterly.	Complied

6.5.2	<p>© A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 11 has implemented Social Policy, Gender Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy was displayed on the notice board which was accessible by the workers. Briefing of the policies was conducted during morning muster and the policies was displayed at the notice board outside the office.</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>Kerdau Estate conducted new mothers assessment on 9/11/2021 and identified needs of 3 new mothers where a mother requires Nursery for Estate Toddlers (NEST) to be open until evening. Management took action to ensure NEST open until evening when required. Latest new mothers assessment was conducted on 25/2/2022 with 5 new mothers needs identified and actions were taken accordingly.</p> <p>Kerdau POM conducted assessment for new mothers on 3/3/2022 and identified 1 new mother who is still on 3-months maternity leave.</p> <p>New mother training/assessment Mentakab Estate dated 29/3/2022.</p> <p>Sungai Mai Estate new mothers assessment dated 25/2/2022 identified 1 mother with needs of monthly appointment with Klinik Kesihatan and management allowed her to go for time off 2 hours without reduce working hours.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Interview conducted on-site with sampled internal stakeholders among all workforce confirmed that the information on grievance mechanism, which respects anonymity and protects complainants where requested, is established and communicated to them.</p> <p>No grievance issues that requires the implementation of the mechanism occurs in all operating units within SOU 11 since the last audit.</p>	Complied

Criterion 6.6: No forms of forced or trafficked labour are used.

6.6.1	<p>© 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>An Inter-Office Mail (IOM) Ref. # CEOUM/HSE/010/03/2022; Date: 28/3/2022 on Forced Labour Prevention Validation Procedure was issued by CEO, Upstream Malaysia to all Regional CEOs and GMs. The new procedure namely Forced Labour Prevention Validation Procedure; UM/HSE/OCP/12; Version # 0; Effective Date: 22/3/2022.</p> <p>The IOM stated no penalty, debt bondage and withholding of wages been imposed to worker if they want to resign. This has been confirmed through the interview and employment contract signed.</p> <p>There's also Nursery for Estate's Toddlers (NEST) Guidelines; Doc. # SDP/PSQM/SU/NEST/001; Rev. 0; Date: 28/5/2018 that requires all children of estate workers are not allowed to go to field and will be taken care by child minder in NEST if not schooling yet.</p>	Complied
6.6.2	<p>© Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 11 has implemented a Sime Darby's Human Rights Charter on where they committed as below:</p> <ol style="list-style-type: none"> a. Providing equal opportunity b. Respecting freedom of association c. Eradicating any form of exploitation d. Ensuring favourable working conditions e. Enhancing Safety and Health <p>They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights. For e.g.: All the workers have provided with induction training in Sua Betong Estate or based estate during their arrival to Malaysia.</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>© The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers.</p>	<p>The respective Operating Units have appointed their Assistant Manager as the person in charge for safety and environment. The PIC role</p>	Complied

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	<p>Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>covers areas of responsibilities on safety, health and welfare of the staff/workers. The Mill and Estates Managers in turn were appointed as the Chairman for the OSH committee. His duties among others was to preside the OSH meetings, discharge the General Duties of Employers and make decision arising out of issues discussed for improvement of Safety, Health, Welfare and the Environment. OSH Committee has been formed consisting of representatives from the management and workers.</p> <p>Workplace inspection in Mill conducted quarterly base, this inspection covered all workstation including biogas area. The latest inspection was on February 2022 before OSH meeting (11/2/2022).</p> <p>In Mentakab Estate, appointment letter for OSH was available dated 8/2/2022. The latest OSH meeting conducted was on 11/2/2022 attended by 25 people.</p>									
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>The Certification Unit continued to use established procedures contained in their OHS Manual (a) 3.4.2 Accident/Incident Investigation & Reporting and (b) 3.3.4.3 Emergency Prevention, Preparedness and Response. The procedures have been summarized in a flow chart form and displayed at notice boards for mill and estates employees information. Likewise, the respective Operating Unit ERP organization chart and important telephone contact numbers have been established and displayed too. ERT members receive training and practice in emergency procedures.</p> <p>Accident record was available in Kerdu POM, sampling as per below:-</p> <p>JKKP 8 record</p> <table border="1" data-bbox="1106 1220 1942 1350"> <thead> <tr> <th>Operating Unit</th> <th>JKKP 8</th> <th>Cases</th> <th>LT</th> </tr> </thead> <tbody> <tr> <td>Kerdau estate</td> <td>JKKP 8/90448/2021 dated 7/1/2022</td> <td>4</td> <td>10.</td> </tr> </tbody> </table>	Operating Unit	JKKP 8	Cases	LT	Kerdau estate	JKKP 8/90448/2021 dated 7/1/2022	4	10.	Complied
Operating Unit	JKKP 8	Cases	LT								
Kerdau estate	JKKP 8/90448/2021 dated 7/1/2022	4	10.								

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

		<table border="1"> <tr> <td>Kerdau POM</td> <td>JKKP 8/92554/2021 dated 24/01/2022</td> <td>23</td> <td>239.13 (Audiometric)</td> </tr> <tr> <td>Mentakab Estate</td> <td>JKKP8/111462/2022</td> <td>1</td> <td>1.97</td> </tr> <tr> <td>Chenor Estate</td> <td>JKKP8/76250/2020</td> <td>1</td> <td>3.34</td> </tr> </table> <p>JKKP 6 record sampling</p> <table border="1"> <thead> <tr> <th>OU</th> <th>JKKP 6</th> <th>Dated</th> <th>MC</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Kerdau estate</td> <td>MD Younus Bapare</td> <td>14/7/2021</td> <td>3</td> </tr> <tr> <td>MD Abdur Rohim</td> <td>10/3/2022</td> <td>14</td> </tr> <tr> <td>Kerdau POM</td> <td>Hudal Firdaus</td> <td>29/1/2021</td> <td>180</td> </tr> <tr> <td>Mentakab estate</td> <td>Gopal Singh</td> <td>28/12/2021</td> <td>3</td> </tr> <tr> <td>Chenor estate</td> <td>Muhamad Taesir</td> <td>7/1/2021</td> <td>100</td> </tr> </tbody> </table> <p>The management conducted training for First Aid for their mandora dated 22/1/2022 attended by all mandora included the sampling workers.</p>	Kerdau POM	JKKP 8/92554/2021 dated 24/01/2022	23	239.13 (Audiometric)	Mentakab Estate	JKKP8/111462/2022	1	1.97	Chenor Estate	JKKP8/76250/2020	1	3.34	OU	JKKP 6	Dated	MC	Kerdau estate	MD Younus Bapare	14/7/2021	3	MD Abdur Rohim	10/3/2022	14	Kerdau POM	Hudal Firdaus	29/1/2021	180	Mentakab estate	Gopal Singh	28/12/2021	3	Chenor estate	Muhamad Taesir	7/1/2021	100	
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6.7.3	© 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	Appropriate personal protective equipment (PPE) been provided 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. All workers at the mill and estates have been trained in safe work practices including	Complied																																			

	<p>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>use of PPE related to their job function. Sampling in Kerdau POM for Engine Room :-</p> <p>Hearing Conservation Training conducted on 7/4/2022 in house training conducted by SA attended by 25 workers for engine room, steriliser, kernel plant and others.</p> <p>PPE Record verification; -</p> <table border="1" data-bbox="1106 580 1774 997"> <tr> <td>Item/workers id</td> <td>23345</td> <td>79767</td> <td>30387</td> </tr> <tr> <td>Ear plug</td> <td>12/4/2022</td> <td></td> <td>7/4/2022</td> </tr> <tr> <td>Leather glove</td> <td></td> <td>7/2/2022</td> <td>5/10/2021</td> </tr> <tr> <td>Ear Muff</td> <td>15/3/2022</td> <td>6/5/2021</td> <td>24/5/2021</td> </tr> <tr> <td>Safety Shoes</td> <td>4/9/2021</td> <td>6/5/2021</td> <td>27/12/2021</td> </tr> <tr> <td>Safety Helmet</td> <td>8/12/21</td> <td>4/9/2020</td> <td></td> </tr> </table>	Item/workers id	23345	79767	30387	Ear plug	12/4/2022		7/4/2022	Leather glove		7/2/2022	5/10/2021	Ear Muff	15/3/2022	6/5/2021	24/5/2021	Safety Shoes	4/9/2021	6/5/2021	27/12/2021	Safety Helmet	8/12/21	4/9/2020		
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<p>6.7.4</p>	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care and accident insurance are provided to all the employees. Workers are covered under SOCSO scheme. Sampled the SOCSO scheme payment schedule at Kerdau POM and supply base estate for March 2022. The Sosco submission were done using the Borang 8A. The coverage of insurance provision in accordance with Malaysia law through SOCSO contribution was insufficiently evident for the workers as following:</p> <p>Mentakab Estate</p> <table border="1" data-bbox="1106 1283 1697 1380"> <tr> <td rowspan="2">March 2022</td> <td>Workers ID</td> <td>SOCSO (RM)</td> </tr> <tr> <td>155060</td> <td>34.40</td> </tr> </table>	March 2022	Workers ID	SOCSO (RM)	155060	34.40	<p>Complied</p>																			
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6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>Lost Time Accident (LTA) metrics at Kerdu Palm Oil Mill and Supply Base were recorded accordingly with periodical annual submission made to DOSH on JKKP 8. Details sampled as follows:</p> <table border="1" data-bbox="1106 1197 1895 1394"> <thead> <tr> <th>Operating unit</th> <th>LTI</th> <th>Cases</th> </tr> </thead> <tbody> <tr> <td>Kerdau estate</td> <td>82.60</td> <td>10</td> </tr> <tr> <td>Kerdau POM</td> <td>10.3</td> <td>1</td> </tr> <tr> <td>Mentakab estate</td> <td>8.21</td> <td>1</td> </tr> </tbody> </table>	Operating unit	LTI	Cases	Kerdau estate	82.60	10	Kerdau POM	10.3	1	Mentakab estate	8.21	1	Complied												
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		Chenor Estate	3.34	1	
		Sg Mai Estate	7.37	1	
Principle 7: Protect, conserve and enhance ecosystems and the environment					
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.					
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rats among others. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Census records show that there was minimal outbreak of leaf eating pest. Although there have been minimal outbreaks of leaf eating pests, beneficial plants are being established to attract natural predators and further reduce the outbreak.</p> <p>Rat Census The management already conduct rat census on monthly basis and result latest was 1.23% (Pest damaged now) and old damage was 0.92%</p> <p>Records show that the estates have planted beneficial plants such as 60% of Cassia cobanensis , 20% of Turnera subulata and 20% of Antigonon leptopus with current ration 1.4dm/ha. Sampling implementation of IPM plan as per verification in Mentakab estate for todate Dec 2021. The actual BOB cencus as per Feb 2022 showed that occupancy was 71%.</p>			Complied
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>There are no species under the Global Invasive Database and CABI.org within the estate and mill premises.</p>			Complied

7.1.3	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. - Minor compliance -	No use fire for pest control been using in estate.	Complied									
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.												
7.2.1	(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. - Critical (Major) compliance -	The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version: 03 dated 01.07.2011. Selected products are specific to the target pest, weed and disease. The use of other Class 1 Chemicals (such as metamidophos and monocrotophos) approved by the Pesticides Board and included in the MPOB list of approved Pesticide for use in oil palm plantations can only be carried out under strict supervision and in absolutely necessary circumstances such as severe outbreak and critical pest infestation, and, with special method of application specified in the Highly Toxic Pesticides Regulation 1996 of the Pesticides Act 1974, after authorization has been received from relevant authorities.	Complied									
7.2.2	(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. - Critical (Major) compliance -	Records of pesticides used (including active ingredients used and area treated, amount of active ingredients applied per ha and number of applications) were established and monitored. The table below shows records of weedicide /pesticide use for the last two financial years. <table border="1" data-bbox="1106 1174 1697 1351"> <thead> <tr> <th data-bbox="1106 1174 1303 1257">Glyphosate</th> <th data-bbox="1303 1174 1500 1257">Mentakab estate</th> <th data-bbox="1500 1174 1697 1257">Chenor Estate</th> </tr> </thead> <tbody> <tr> <td data-bbox="1106 1257 1303 1307">2022</td> <td data-bbox="1303 1257 1500 1307">0.394</td> <td data-bbox="1500 1257 1697 1307">0.12</td> </tr> <tr> <td data-bbox="1106 1307 1303 1351">2021</td> <td data-bbox="1303 1307 1500 1351">0.441</td> <td data-bbox="1500 1307 1697 1351">0.542</td> </tr> </tbody> </table>	Glyphosate	Mentakab estate	Chenor Estate	2022	0.394	0.12	2021	0.441	0.542	Complied
Glyphosate	Mentakab estate	Chenor Estate										
2022	0.394	0.12										
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		Triclopyr Butoxy ethyl	Mentakab estate	Chenor Estate	
		2021	0.064	1.51	
		2020	0.121	1.22	
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The estates have implemented a continuous improvement plan for year 2022 where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan. Sighted during the site visit the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at intended areas. Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead.</p>			Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>Not applicable because there has been no prophylactic use of pesticides at the visited estates.</p>			Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ol style="list-style-type: none"> Judgment of the threat and verify why this is a major threat Why there is no other alternative which can be used Which process was applied to verify why there is no other less hazardous alternative What is the process to limit the negative impacts of the application 	<p>Sime Darby Plantation only purchase chemicals that are registered under the Malaysian Pesticides Act 1974 (Act 149) and Regulations. Sighting of the Chemical Register dated 01/01/2021 at these estates showed that only class II, III & IV chemicals were used. There were no Class 1A and Class 1B agrochemicals used. Paraquat was eliminated totally. In its place, alternatives such as Glyphosate were used instead. As per Chemical register in Kerdu estate dated 31/2/2021, no chemical under class 1A or 1B or that listed by the Stockholm or Rotterdam Conventions, and paraquat.</p>			Complied

	<p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>		
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were handled, used or applied by trained workers in accordance with the product label. In addition to the product label, Safety Data Sheets were used and explained to the participants with emphasis on PPE, health and environmental risks of pesticide exposure; recognition of acute and long-term exposure; ways to minimize exposure to workers and their families; and international and national instruments or regulations that protect workers' health.</p> <p>Training for pesticides handler are as shown in the table below:</p> <p>Chenor Estate</p> <ul style="list-style-type: none"> • Training on SOP Spraying and PPE application dated 21/1/2022 by Muhammad Razif Ramli. <p>Sg Mai Estate</p> <ul style="list-style-type: none"> • Training on spraying P&D dated 9/12/2021 • Training on application chemical in nursery dated 5/4/2021 • Selective spraying dated 29/7/2021 	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>At estates assessed the storage of pesticides was in accordance with the Occupational Safety and Health Act 1994 (Act 514), Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations. All information regarding the chemicals affixed as product label and the accompanying Safety Data Sheet (see OSH CLASS 2013 Regulations) with details of its usage, hazards, trade and generic names were made available at the chemical store and explained to the workers by Management. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical</p>	Complied

		<p>register, trade and generic names, and their Safety data Sheet were available with latest revision and up to date.</p>	
<p>7.2.8</p>	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -</p>	<p>The procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established.</p> <ul style="list-style-type: none"> a) Collection of SW is made by Rengkas Maju Sdn Bhd and Kualiti Alam Sdn Bhd. a) The clinical waste SW 404 is disposed to Kualiti Alam Sdn Bhd and Cenviro Services Sdn Bhd. b) Empty containers were tripled rinsed, pierced and delivered to a registered recycler company M/s SS Ravi Recycle Trading. <p>Visit to waste storage confirmed that empty pesticide containers were collected with proper storage. These items will be punctured and disposed as scheduled waste as the EQA. The SOP of disposal pesticide container is described in the estates in SOU 11, procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established. Content includes the triple rinsing procedures and the relevant training to be conducted. Visit to waste storage confirmed that empty pesticide containers were collected with proper storage. These items will be punctured and disposed as scheduled waste as the EQA. The SOP of disposal pesticide container is described in the estates in SOU 11, procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established. Content includes the triple rinsing procedures and the relevant training to be conducted.</p> <p>Under the operational control procedure established as given in 4.5.3.3 above the guideline and practice for handling empty pesticides containers are as follows;</p> <ul style="list-style-type: none"> a) All class 2 and above containers are tripled rinsed and holes punctured at the bottom only if the waste generator is to 	<p>Complied</p>

		<p>dispose as non-scheduled waste.</p> <p>b) Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process.</p> <p>These guidelines are based on Department Of Agriculture ref 91/120/038/014 dated 7/11/2002. During the site visit this has been adhered mainly containers are tripled rinsed and holes punctured at the container base. The estates dispatched the empty containers either together with their SW disposal or to a registered recycler. .</p> <table border="1" data-bbox="1160 667 1794 1045"> <thead> <tr> <th></th> <th>Estate</th> <th>Date</th> <th>Empty Containers</th> <th>Empty Bags</th> <th>Empty Drums</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Chenor</td> <td>08/2/22</td> <td>225</td> <td>2080 kg</td> <td>-</td> </tr> <tr> <td>2</td> <td>Sg Mai</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>3</td> <td>Kerdau</td> <td>11/01/22</td> <td>320 units</td> <td>2700 kg</td> <td>52 units</td> </tr> <tr> <td>4</td> <td>Mentakab</td> <td>05/3/22</td> <td>248 units</td> <td>-</td> <td>-</td> </tr> </tbody> </table>		Estate	Date	Empty Containers	Empty Bags	Empty Drums	1	Chenor	08/2/22	225	2080 kg	-	2	Sg Mai	-	-	-	-	3	Kerdau	11/01/22	320 units	2700 kg	52 units	4	Mentakab	05/3/22	248 units	-	-	
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7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticide application by aerial spraying is not practiced by the estates. Verified during onsite visit to the estates that no pesticide application by aerial spraying done.</p>	Complied																														
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Following the CHRA conducted at each Operating Unit Annual medical surveillance has been carried out for all pesticide operators at the said estates as recommended by the CHRA Assessor. CHRA in Mentakab</p>	Complied																														

		<p>estate was conducted 6/6/2020 by Azhar Hazardous Chemical Consultancy (Report ref: HQ/14/ASS/00/00001-2020/16).</p> <p>Medical surveillance record of those operators was examined and all of them were certified fit with no detrimental to health by registered Occupational Health Doctor, HQ/15/DOC/00/390 dated 1/4/2022.</p> <p>Medical surveillance record was available in Chenor estate conducted by 4/3/2022 attended by 13 person. This included foreman, technician, chemical mixing and trunk injection. This followed as per CHRA (HQ/14/ASS/00/00001-2020/15 dated 29/9/2020).</p>					
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Pregnant and breast-feeding women, under-age person and other people that have medical restrictions working with pesticides are strictly prohibited to work with pesticides. Noted, there were women working as sprayers. Verified that the female workers were checked for pregnancy test at three-month interval by the on-site Estate Hospital Assistant. All results showed negative findings. Also, verified master list of workers and interview with management and workers found no record of workers under the of 18 in all estate.</p>	Complied				
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>							
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>SOU 11 Kerbau Mill and all the 4 estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2022 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1108 1292 1870 1340"> <thead> <tr> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Receptor	Sources			Complied
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.

All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2022. The waste generated from the mill/estates operations as shown below:

	Type of waste	Details
1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries
2	Domestic waste	rubbish from the mill/estate complex and employees' quarters
3	Industrial waste	Fiber, palm kernel shell, boiler ash, scrap iron
4	Sewage	Sewage from housing/office complex

		<p>The pollution identified from the mill/estates activities:</p> <table border="1" data-bbox="1133 587 1877 788"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke</td> <td>Emission from Boilers/vehicles/engines</td> </tr> <tr> <td>2</td> <td>Odor & gases</td> <td>Activities from the effluent treatment</td> </tr> <tr> <td>3</td> <td>Leakage of lubricant</td> <td>Storage & vehicle maintenance</td> </tr> </tbody> </table>		Type of waste	Details	1	Black smoke	Emission from Boilers/vehicles/engines	2	Odor & gases	Activities from the effluent treatment	3	Leakage of lubricant	Storage & vehicle maintenance	
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1	Black smoke	Emission from Boilers/vehicles/engines													
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>In Kerdu POM and the estates in SOU 11, procedure SD/SDP/PSQM (ESH)/203-EN1 – Scheduled Wastes (Hazardous Waste) Management has been established.</p> <p>a) Management and disposal of waste water 2022 has been established compiled by Assistant Engineer/Assistants/Staff.</p> <p>b) Waste Management Plan 2021 has been established prepared by QA and verified by the Assistant Engineer/Assistants/Staff.</p> <p>c) Waste Management Plan 2022 has been established in Jan 2022.</p> <p>d) Based on Environmental Impact Evaluation (file no: SM/5.2/EIE) and Environment Aspect and Impact Identification (file no: SM/5.2/EAI) improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination.</p> <p>e) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.</p>	Complied												

f) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The CU scheduled waste is disposed to the following vendors registered with DOE.

Estate	Date	SW409	SW410	SW305	SW404
Kerdau	17/2/22	-	0.080	0.800	-
Kerdau	20/8/21	-	0.120	0.800	-
Kerdau	08/3/21	-	0.225	0.800	-
Mentaka b	05/3/22	0.100	0.200	0.600	-
Mentaka b	24/9/21	0.120	0.195	0.556	-
Mentaka b	07/2/22	-	-	-	0.003
Mentaka b	03/9/21	-	-	-	0.003
Chenor	06/9/21	-	0.004	0.014	-
Chenor	04/8/21	-	0.018	0.024	-
Chenor	27/1/22	-	-	-	0.013
Chenor	25/5/21	-	-	-	0.0051

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			SW41 8	SW410	SW409	SW404	
	Sg Mai	22/3/22	0.020	0.200	0.405	-	
	Sg Mai	13/1/22	-	-	-	0.003	
	Sg Mai	03/9/21	-	-	-	0.002	
		-	SW30 5	SW410	SW306	SW404	
	Sg Mai	03/2/22	0.500	-	0.100	-	
		-	SW30 6	SW410	SW305	SW324	
	KPOM	14/12/2 1	-	-	0.218	-	
	KPOM	16/11/2 1	1.917	0.153	0.218	0.020	
	KPOM	16/03/2 1	1.881	0.060	0.200	0.030	

Kerdau clinical waste initiated in 16/11/21 on new recruitment of MA. The lapses of MA absence due to resignation estate diverted workers for treatment to sister estates dispensary. The CU scheduled waste is

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disposed to the following vendors registered with DOE. Chenor experienced slight delay in dispatch of SW404 due to flooding issues.

	Estate	Date	SW Buyers/Vendor
1	Kerdau	31/1/22	Rengkas Maju M Sdn Bhd
2	Mentakab	30/4/22	Rengkas Maju M Sdn Bhd
3	Mentakab	30/4/22	Kualiti Alam Sdn Bhd
4	Chenor	30/4/20	Kualiti Alam Sdn Bhd / SDI
5	Sg Mai	30/4/22	Kualiti Alam Sdn Bhd
6	KPOM	30/4/22	Kualiti Alam Sdn Bhd

Domestic waste for the operating units in

SOU 11 was disposed as follows;

	Disposal site		Remarks
	Estate	External	
Kerdau	-	MPT	Collection 2/3 x week
Mentakab	P99A1	-	Collection 2/3 x week
Chenor	-	MDM	Collection 2/3 x week
Sg Mai	P02S/P7J	-	Collection 2/3 x week

		<table border="1"> <tr> <td>KPOM</td> <td>-</td> <td>MPT</td> <td>Collection 2/3 x week</td> </tr> </table>	KPOM	-	MPT	Collection 2/3 x week	
KPOM	-	MPT	Collection 2/3 x week				
		<p>Kerdau Estates and Mill initiated disposed domestic wastes to Majlis Perbandaran Temerloh tapak perlupusan sanitari belengu halt effective Mac 2022. Evidences of collection were verified through the payment made to the e.g bill no B 0050048 dated 15/03/2022.</p>					
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	<p>There was no land preparation in SOU 11 Mill and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <p>a) EQMS SOP Section-B2 under felling/clearing & land preparation b) Carbon Policy</p> <p>As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate. No fire was used for waste disposal.</p>	Complied				
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.							
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	Good agriculture practices are followed including as per recommendation from annual agronomist visit reports been followed at estates to manage accordingly on soil fertility to optimise yield and	Complied				

	- Minor compliance -	minimise environmental impacts. E.g. the agronomist visit was conducted on 24/05/2021 and at Mentakab estate. The visit covered all of the oil palm fields and findings were used as guidance in formulating the fertilizer inputs and suggesting site – specific agronomic practices for yield and growth improvement. The visit was accompanied by the Manager and Assistant Manager.																					
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	Periodic tissue and soil sampling conducted by the certification unit as per detailed in the annual agronomist visit reports at each estate. E.g. for Mentakab Estate for Leaf N – percentage of sampling blocks with adequate level remained at 39% of the sampling blocks now within satisfactory level. Nevertheless, lower average was noted in Edensor Div. with several blocks recorded low N Value. Majority of the field showed decreasing leaf Phosphorus level with 60% of the sampling blocks now were under low category, compared to only 27% previously.	Complied																				
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	All the 4 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 and EFB mulching. In addition, during replanting, palms were felled, chipped, windowed and left to decompose. Records showed that the estates programmed / applied EFB at 20 tons/ha in 2021 are as follows: <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>Estate</th> <th>Field no</th> <th>Ha</th> <th>Mt</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kerdau</td> <td>2009A</td> <td>79.63</td> <td>3185</td> </tr> <tr> <td>2</td> <td>Kerdau</td> <td>2014B</td> <td>75.57</td> <td>3023</td> </tr> <tr> <td>3</td> <td>Mentakab</td> <td>2012A</td> <td>69.74</td> <td>2441</td> </tr> </tbody> </table>		Estate	Field no	Ha	Mt	1	Kerdau	2009A	79.63	3185	2	Kerdau	2014B	75.57	3023	3	Mentakab	2012A	69.74	2441	Complied
	Estate	Field no	Ha	Mt																			
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7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Like all SDP Estates, the estates visited in SOU 11 continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ul style="list-style-type: none"> a) Slope & River Protection Policy b) Buffer Zone & 25-degree slope and in item 8 Section 4 c) Land Preparation for Terracing in ARM Manual. <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds,</p>	Complied																																													

		<p>EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in some mature areas. The cover crop <i>mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>neprolepis biserrata</i> in the inter rows were sighted during the visit. The slope maps for the titled ha were provided by the R&D Precision Agriculture Unit with details as follows:</p> <table border="1" data-bbox="1178 667 1832 986"> <thead> <tr> <th></th> <th>Topography</th> <th>Kerdau</th> <th>Sg Mai</th> <th>Chenor</th> <th>Mentakab</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0-2</td> <td>19.70</td> <td>23.16</td> <td>13.87</td> <td>29.92</td> </tr> <tr> <td>2</td> <td>2-6</td> <td>57.02</td> <td>45.62</td> <td>54.84</td> <td>50.23</td> </tr> <tr> <td>3</td> <td>6-12</td> <td>19.35</td> <td>18.11</td> <td>28.55</td> <td>37.53</td> </tr> <tr> <td>4</td> <td>12-20</td> <td>3.67</td> <td>9.36</td> <td>2.71</td> <td>5.83</td> </tr> <tr> <td>5</td> <td>20-25</td> <td>0.25</td> <td>2.58</td> <td>0.02</td> <td>0.07</td> </tr> <tr> <td>6</td> <td>>25</td> <td>0.01</td> <td>1.17</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td></td> <td>Total</td> <td>100%</td> <td>100%</td> <td>100%</td> <td>100%</td> </tr> </tbody> </table>		Topography	Kerdau	Sg Mai	Chenor	Mentakab	1	0-2	19.70	23.16	13.87	29.92	2	2-6	57.02	45.62	54.84	50.23	3	6-12	19.35	18.11	28.55	37.53	4	12-20	3.67	9.36	2.71	5.83	5	20-25	0.25	2.58	0.02	0.07	6	>25	0.01	1.17	0.00	0.00		Total	100%	100%	100%	100%	
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7.5.3	<p>There is no new planting of oil palm on steep terrain. - Minor compliance -</p>	<p>This compliance being addressed in the "<i>Slope and River Protection</i>" signed by the CEO dated Jan 2015 stating the following among others; "Slope of >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.</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.</p>	Complied																																																

	- Critical (Major) compliance -		
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	There is no peat soil or soil categorized as marginal or fragile soil at all estates visited. Addressed in the Sime Darby Plantation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2: a) Protect and enhance forest: "We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through: i. No new development of peat areas, regardless of depth or location. ii. We will seek to rehabilitate existing plantings on peat where possible.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys are done and available in a soil map at all estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates.	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 peat soil or soil categorized as marginal or fragile soil all estates visited. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	There is no peat soil or soil categorized as marginal or fragile soil all estates visited. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.	Not Applicable

7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil all estates visited. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Not Applicable
7.7.4	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	<p>The water and ground cover management programme is documented in the Sime Darby Agricultural Reference Manual (Water Management in Coastal and Peat lands) issued on 01.07.2011. Details are described in 7.8.1. individual estates and mill had their respective water management plan mainly to monitor among others the following;</p> <ul style="list-style-type: none"> a) Monitor the quality of main water inlet/outlet for pollutants from estate’s operations. b) Contingency during water shortage. c) Field water management - side pit construction d) Adequate field drains e) Reuse/recycle waste water. f) Peat soil water management 	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>There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.</p>	Complied

	- Critical (Major) compliance -		
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.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <ul style="list-style-type: none"> a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. b) Workers have adequate access to clean water. <p>- Minor compliance -</p>	<p>SOU 11 Mill /estates had established its Water Management Plan 2022 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <ul style="list-style-type: none"> a) Implementation of 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>	Complied

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Water source	Usage	Monitoring & measurement	Freq	PIC	Review status
1 PAIP	Purchased for domestic consumption	Monitoring water supply	Mthly	AM Mgr	Liaison with Authority
2 Rain water	Domestic use Workshop Chemical mixing	Rain fall data	On-going	AM Mgr	Water harvesting for general washing
3 Water tank	Emergency water supply	-	-	AM Mgr	Request water supply from other estates
The contingency plan during water shortage					
Area/ incident	Action steps		PIC	Status	
1 Water shortage / prolonged dry season	To obtain water from local authority /Mill catchment To train/educate staff/workers to conserve water		Manager AM/Mill Engineer	As and when required	

			<p>To seek assistance from local authority To obtain treated water supply from mill's WTP</p>									
		<p>2 Severe water pollution / Contamination</p>	<p>To obtain water from PAIP To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP</p>	<p>Manager AM//Mill Engineer</p>	<p>As and when required</p>							
<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>												
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Estate/Mill</th> <th style="width: 20%;">Review date</th> <th style="width: 30%;">Issues</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>							Estate/Mill	Review date	Issues			
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		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						
			location	Wastewater 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,	Monsoon drain,	Monsoon drain

			turbine cooling water	recycled tank																																			
		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 SDP policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014). The buffer zones established are as follows:</p> <table border="1"> <thead> <tr> <th></th> <th><i>River width</i></th> <th><i>Buffer zone</i></th> <th></th> <th><i>River width</i></th> <th><i>Buffer zone</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>> 40 m</td> <td>50 m</td> <td>4</td> <td>5 - 10 m</td> <td>10 m</td> </tr> <tr> <td>2</td> <td>20 - 40 m</td> <td>40 m</td> <td>5</td> <td>< 5 m</td> <td>5 m</td> </tr> <tr> <td>3</td> <td>10 - 20 m</td> <td>20 m</td> <td>-</td> <td></td> <td>-</td> </tr> </tbody> </table> <p>The signboards were displayed accordingly at the site where applicable. The guideline was issued by the GSD Unit with latest revision dated on 13/06/2011. During the field visit there was no spraying activities or signs left in such an area. The buffer zones identified at the estates are as follows:</p> <table border="1"> <thead> <tr> <th></th> <th><i>Estate</i></th> <th><i>Buffer zone area</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kerdau</td> <td>Sg Jentar Field no P2014C</td> </tr> <tr> <td>2</td> <td>Chenor</td> <td>Nil</td> </tr> </tbody> </table>					<i>River width</i>	<i>Buffer zone</i>		<i>River width</i>	<i>Buffer zone</i>	1	> 40 m	50 m	4	5 - 10 m	10 m	2	20 - 40 m	40 m	5	< 5 m	5 m	3	10 - 20 m	20 m	-		-		<i>Estate</i>	<i>Buffer zone area</i>	1	Kerdau	Sg Jentar Field no P2014C	2	Chenor	Nil	Complied
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3	Mentakab	Sg Chermang Kanan/Kiri/Sg Semantan
4	Sg Mai	Water catchment/Sg Mai
5	Kerdau POM	Water catchment area - P 05/95B

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

	Estate	Sampling Points	Frequency
1	Mentakab	P97A1 / P98A2 / P99A3	4x /year
2	Chenor	Nil	
3	Kerdau	Water catchment	monthly
4	Kerdau	Treated water-domestic	monthly

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

		<table border="1" style="margin-left: auto; margin-right: auto;"> <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> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <th></th> <th>parameter</th> <th>Standard</th> <th></th> <th>Parameter</th> <th>standard</th> </tr> <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 style="text-align: center;">Unit in</p> <p>MPN/100mL otherwise stated</p>		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>Based on Jadual Pematuhan KPOM disposed effluent through water discharge. Sighted quarterly report has been submitted to DOE (license no 0005105) 01/07/2021 - 30/06/2022) by quarterly basis. Latest submission for to DOE on Jan 22 for period Oct - Dec 2021. Among others the indicators were:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th></th> <th>STD</th> <th>6/10/21</th> <th>2/11/21</th> <th>7/12/21</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>5-9</td> <td>9.20</td> <td>9.30</td> <td>9.30</td> </tr> <tr> <td>2</td> <td>BOD mg/l</td> <td>100</td> <td>14.00</td> <td>8.00</td> <td>51.00</td> </tr> <tr> <td>3</td> <td>A Nitrogen</td> <td>150</td> <td>1.00</td> <td>1.00</td> <td>1.00</td> </tr> </tbody> </table>			STD	6/10/21	2/11/21	7/12/21	1	pH	5-9	9.20	9.30	9.30	2	BOD mg/l	100	14.00	8.00	51.00	3	A Nitrogen	150	1.00	1.00	1.00	Complied																																				
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RSPO P&C Public Summary Report
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill processing water are obtained from the PAIP and water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis. The usage in 2021 is as follows;</p> <table border="1" data-bbox="1189 799 1845 1377"> <thead> <tr> <th>No</th> <th>Month</th> <th>Water/m t</th> <th>FFB /mt</th> <th>Water /FFB</th> </tr> </thead> <tbody> <tr><td>1</td><td>Jan</td><td>8524</td><td>9578</td><td>0.89</td></tr> <tr><td>2</td><td>Feb</td><td>14479</td><td>11976</td><td>1.21</td></tr> <tr><td>3</td><td>Mac</td><td>14455</td><td>17306</td><td>0.84</td></tr> <tr><td>4</td><td>Apr</td><td>8601</td><td>17520</td><td>0.49</td></tr> <tr><td>5</td><td>May</td><td>7302</td><td>16369</td><td>0.45</td></tr> <tr><td>6</td><td>Jun</td><td>11455</td><td>18256</td><td>0.63</td></tr> <tr><td>7</td><td>July</td><td>13828</td><td>18937</td><td>0.73</td></tr> <tr><td>8</td><td>Aug</td><td>18733</td><td>22354</td><td>0.84</td></tr> <tr><td>9</td><td>Sep</td><td>6248</td><td>13235</td><td>0.47</td></tr> <tr><td>10</td><td>Oct</td><td>17722</td><td>20275</td><td>0.83</td></tr> </tbody> </table>	No	Month	Water/m t	FFB /mt	Water /FFB	1	Jan	8524	9578	0.89	2	Feb	14479	11976	1.21	3	Mac	14455	17306	0.84	4	Apr	8601	17520	0.49	5	May	7302	16369	0.45	6	Jun	11455	18256	0.63	7	July	13828	18937	0.73	8	Aug	18733	22354	0.84	9	Sep	6248	13235	0.47	10	Oct	17722	20275	0.83	Complied
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Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised															
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report 2022. The document was reviewed/updated on Jan 2022. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table border="1"> <thead> <tr> <th></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 / Supervisory vehicle</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To record vehicle activity in order to eliminate waste activity which consume fuel.</td> </tr> </tbody> </table>		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 / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To record vehicle activity in order to eliminate waste activity which consume fuel.	Complied
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		Nov	2.15	1.16	1.11	2.42	0.76	
		Dec	2.46	2.11	1.53	2.87	0.72	
<p>The estates and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running. Performance variation in view of several factors i.e.</p> <ul style="list-style-type: none"> a) Infrastructure of estates, b) Community size / no of gen-sets, c) No. of vehicles / age of machine. d) Weather interference / crop production volume <p>There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p> <p>Kerdau Mill and SOU 11 Estates</p> <p>A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2022 identified in the following</p> <ul style="list-style-type: none"> a) Environmental Aspect Identification Summary FY 2022 reviewed accordingly. b) Environmental Impact Evaluation Summary FY 2022 reviewed accordingly. <p>Renewable energy usage & diesel consumption 2021 was established and monitored by monthly basis. Among others effort to reduce diesel usage includes the following;</p> <ul style="list-style-type: none"> a) By maintenance of the boiler & machinery to ensure at optimum level, b) to monitor diesel usage, provide training to workers regarding reduce fuel and diesel usage for boiler. 								

Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 11 Mill and Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.</p> <p>a) The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment.</p> <p>Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.</p>	Complied
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>SOU 11 has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. There is no new development within the SOU 11 estates.</p>	Complied
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. (SM/5.2/EAI) and (SM/5.2/EIE) which covers estates and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:</p>	Complied

			Environmental Receptors	Source	
		1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).	
		2	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down	
		3	land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.	
<p>Kerdau Mill conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS was found to be in functional condition. Data from the stack is connected online to DOE’s office. Boiler smoke emission data are within the DOE limit.</p> <p>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent.</p> <p>‘Pollution prevention plan and waste management action plan’ is used to identify the waste products and sources of pollution – is in place</p>					

		<p>and is being reviewed and implemented accordingly. Among of action has been taken by CU were:</p> <ul style="list-style-type: none"> a) Scheduled wastes – were disposed through Rengkas Maju Sdn Bhd, Kualiti Alam Sdn Bhd, Sharps & Bins Sdn Bhd. b) Domestic wastes are disposed to Majlis Perbandaran Temerloh/Maran landfill and internal for Kerbau Estate/POM and other estates respectively thrice/twice weekly accumulated at designated area located far from housing complexes and waterways for other estates in the CU. c) Full compliance to zero burning practices. 	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>There was no land preparation of existence or new planting in SOU 11 and Estates by burning ever since SDP practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> a) EQMS-SOP-Section B2 - Under felling/clearing & land preparation b) Carbon Policy <p>As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, 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 Kertas Kerja Program Simulasi Kebakaran dated 11/04/2022. Therein containing</p> <ul style="list-style-type: none"> a) Objective b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill <p>The procedure was formalized by RSQM for use in all operating units in SDP Estates and mills. Training related to fire drill / prevention are conducted annually.</p> <table border="1" data-bbox="1167 738 1682 1198"> <thead> <tr> <th></th> <th>Estate / Mill</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kerdau Estate</td> <td>20/01/2 2</td> <td>03/03/2 2</td> </tr> <tr> <td>2</td> <td>Mentakab Estate</td> <td>11/02/2 2</td> <td>26/03/2 1</td> </tr> <tr> <td>3</td> <td>Chenor Estate</td> <td>01/04/2 2</td> <td>26/12/2 1</td> </tr> <tr> <td>4</td> <td>Sg Mai Estate</td> <td>28/03/2 2</td> <td>09/3/22</td> </tr> <tr> <td>5</td> <td>Kerdau POM</td> <td>24/01/2 2</td> <td>08/10/2 0</td> </tr> </tbody> </table>		Estate / Mill	Date	Date	1	Kerdau Estate	20/01/2 2	03/03/2 2	2	Mentakab Estate	11/02/2 2	26/03/2 1	3	Chenor Estate	01/04/2 2	26/12/2 1	4	Sg Mai Estate	28/03/2 2	09/3/22	5	Kerdau POM	24/01/2 2	08/10/2 0	Complied
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<p>7.11.3</p>	<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 11 held engagement with the adjacent stakeholders via briefing sessions as stated in ERP procedure Fire Prevention Control Measures Sime Darby Plantation / Kertas Kerja Program Simulasi Kebakaran at respective dates 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. The recent being on the following through correspondence made to all stakeholders informing on the compliance to RSPO/ISCC/MSPO.SCCS in accordance with SDP MQMS/EQMS. This is inclusive on the fire prevention and control measures akin to the earlier session in meetings. There were also cases of non-presence of invitees of the adjacent stakeholders whereby they will be communicated in writing. There was no live consultation in 2020 / 2021 at certain OU due to MCO restriction.</p> <table border="1" data-bbox="1111 1005 1677 1337"> <thead> <tr> <th></th> <th>Estate / Mill</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kerdau Estate</td> <td>04/1/22</td> <td>08/10/20</td> </tr> <tr> <td>2</td> <td>Mentakab Estate</td> <td>11/02/22</td> <td>26/03/21</td> </tr> <tr> <td>3</td> <td>Chenor Estate</td> <td>30/03/22</td> <td>26/01/21</td> </tr> <tr> <td>4</td> <td>Sg Mai Estate</td> <td>07/03/22</td> <td>2/03/21</td> </tr> <tr> <td>5</td> <td>Kerdau POM</td> <td>24/01/22</td> <td>08/10/20</td> </tr> </tbody> </table>		Estate / Mill	Date	Date	1	Kerdau Estate	04/1/22	08/10/20	2	Mentakab Estate	11/02/22	26/03/21	3	Chenor Estate	30/03/22	26/01/21	4	Sg Mai Estate	07/03/22	2/03/21	5	Kerdau POM	24/01/22	08/10/20	<p>Complied</p>
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5	Kerdau POM	24/01/22	08/10/20																								

Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest.</p> <p>Thus requirement in relation to land use change analysis is not necessary.</p>	Complied
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>The high biodiversity is included in the HCV assessment report dated April 2009. Birds, mammals, reptiles, insect (least concern and vulnerable) and totally protected and protected wildlife were identified based on the latest HCV report.</p> <p>For example vulnerable animal; bearded pig (mammals) under category totally protected. The established management plan has been incorporated the action plan for those identified animals (IUCN and WCA 2010) for proper monitoring.</p> <p>The HCV re-assessment was compiled by PSQM Department SDP on March 2016 for the entire SOU 11 estates. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <ul style="list-style-type: none"> a) Overview of HCV assessment b) Description of assessment area <ul style="list-style-type: none"> - Landscape context - biodiversity & conservation values - ecosystem service / social & cultural values c) HCV criteria & application to agriculture <ul style="list-style-type: none"> - Visual observation & supporting information - Wildlife in plantation - decision on HCV status 	Complied

		<p>d) HCV Biodiversity Management / Monitoring.</p> <p>The report is given in details to provide the existence of HCV, complete with photo and description The conservation and management of such identified areas are also detailed therein. The HCV areas presence 144.280 ha) as identified by the Estates within SOU 11 are given below.</p> <table border="1" data-bbox="1122 619 1877 967"> <thead> <tr> <th></th> <th>Area</th> <th>HCV</th> <th>Kerdau</th> <th>Chenor</th> <th>Mentakab</th> <th>Sg Mai</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water catchment</td> <td>4</td> <td>7.37</td> <td>7.82</td> <td>-</td> <td>1.95</td> </tr> <tr> <td>2</td> <td>River Reserve</td> <td></td> <td>-</td> <td>-</td> <td>31.70</td> <td>35.38</td> </tr> <tr> <td>3</td> <td>Worship area</td> <td>6</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>4</td> <td>Jah Hut Cemetery</td> <td>6</td> <td>0.0002</td> <td>-</td> <td>-</td> <td>0.01</td> </tr> <tr> <td>5</td> <td>Bukit Kiab</td> <td>4</td> <td>59.00</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>6</td> <td>Pond</td> <td>4</td> <td>1.05</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table> <p>Il areas were sighted and verified. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented. The HCVs, conservation areas/environmentally sensitive areas e.g. waterways , protected forest which passes bordering through the estate had been identified and being monitored</p> <p>The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest</p> <p>Hence the current HCV assessment of the estates remains valid. The recent HCV assessment for the entire SOU 11 covering all the estates</p>		Area	HCV	Kerdau	Chenor	Mentakab	Sg Mai	1	Water catchment	4	7.37	7.82	-	1.95	2	River Reserve		-	-	31.70	35.38	3	Worship area	6	-	-	-	-	4	Jah Hut Cemetery	6	0.0002	-	-	0.01	5	Bukit Kiab	4	59.00	-	-	-	6	Pond	4	1.05	-	-	-	
	Area	HCV	Kerdau	Chenor	Mentakab	Sg Mai																																														
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		<p>and the mill was performed in Mac 2016 by the PSD personnel. Methodology is through site observation, interviews, stakeholders consultation and desktop review on available secondary data. The assessment among others covers the following areas;</p> <ul style="list-style-type: none"> a) Overview of HCV assessment. b) Description of assessment areas. c) Finding and discussion <ul style="list-style-type: none"> - landscape context - HCV criteria and application to agriculture d) HCV monitoring and management 	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not Applicable	Not Applicable
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or eABHnced. An integrated management plan to protect and/or eABHnce HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>The 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 11 estates (refer 7.3.1 to 7.4.2).</p> <p>The recent HCV assessment for the entire SOU 11 covering all the 4 estates and the mill was performed in Mac 2016 by the PSD personnel. Methodology is through site observation, interviews, stakeholders consultation and desktop review on available secondary data. The assessment among others covers the following areas;</p> <ul style="list-style-type: none"> a) Overview of HCV assessment. b) Description of assessment areas. c) Finding and discussion <ul style="list-style-type: none"> - landscape context - HCV criteria and application to agriculture e) HCV monitoring and management <p>Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PA/GM</p>	Complied

		and also personnel from the Sustainability unit. Sighting of RTE are made and recorded during the AP rounds in the estates if any. Highlights if any are discussed during the management review or management meetings subject to the urgency of the situation.	
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -	There was no rights of local communities been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas. The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird, presence of wild boar and monkeys occasionally sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan reviewed in Jan 2022.	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -	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 11 estates (refer 7.3.1 to 7.4.2).	Complied
7.12.7	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. - Minor compliance -	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 11 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.	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 11 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 **2021** for Kerdu POM and supply base was calculated using the PalmGHG Calculator version 4.0 The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2021** for Kerdu POM and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	2.30
PKO	0

Extraction	%
OER	20.56
KER	4.90

Production	t/yr
FFB Process	191,734.21
CPO Produced	39,420.55
PKO Produced	9,394.97

Land Use	Ha
OP Planted Area	12,518.29
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	12,518.29

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	20,882.85	0.75	97,771.41	59.1	0.00	0.00	118,654	59.8
CO ₂ Emission from fertilizer	2,830.8	0.10	11,893.36	7.19	0.00	0.00	14,724.16	7.29
NO ₂ Emission	1,535.39	0.05	7,148.78	4.32	0.00	0.00	8,684.17	4.37
Fuel Consumption	10.88	0.00	17.89	0.01	0.00	0.00	28.77	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-19794.16	-0.71	-92660.39	-56.01	0.00	0.00	-112,454.55	-56.72
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	5465.75	0.20	24171.05	14.61	0.00	0.00	29636.8	14.81

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	38,959.26	0.20
Fuel Consumption	480.22	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	39,439.48	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

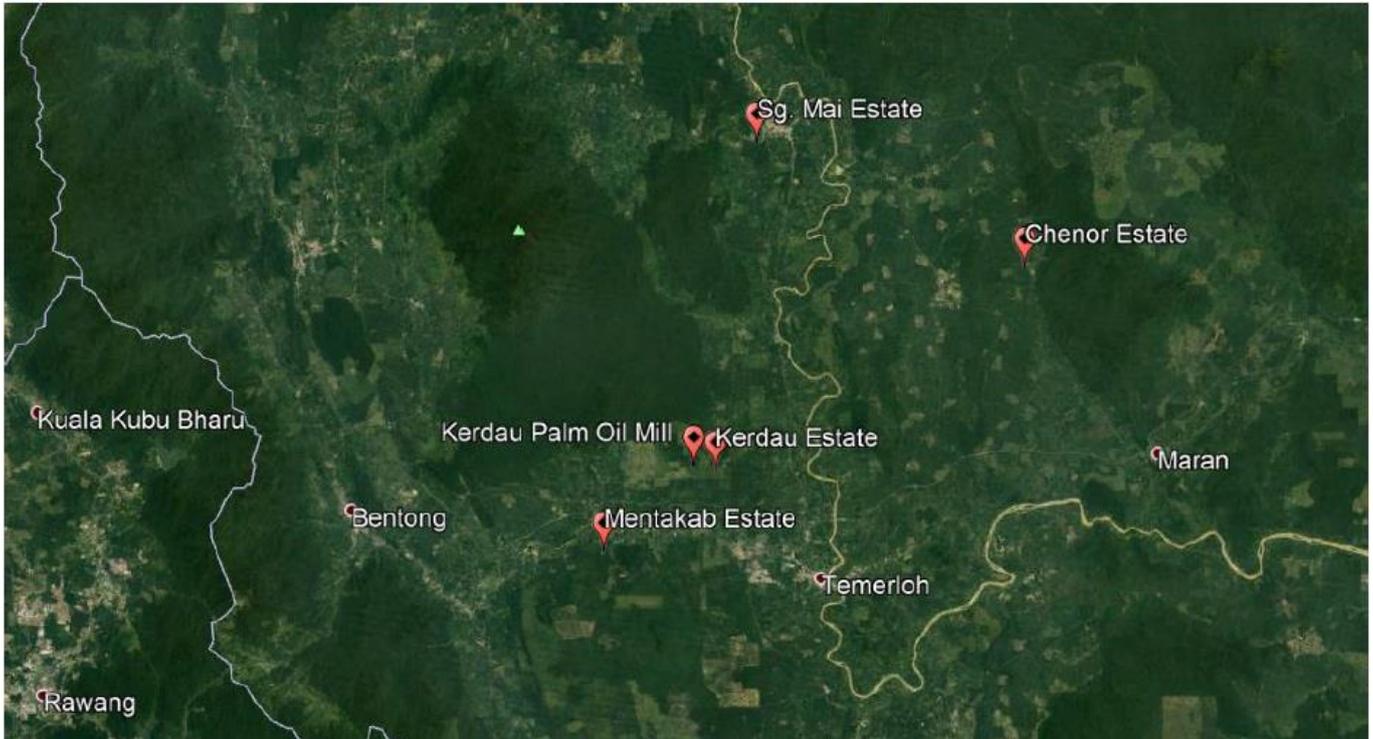
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

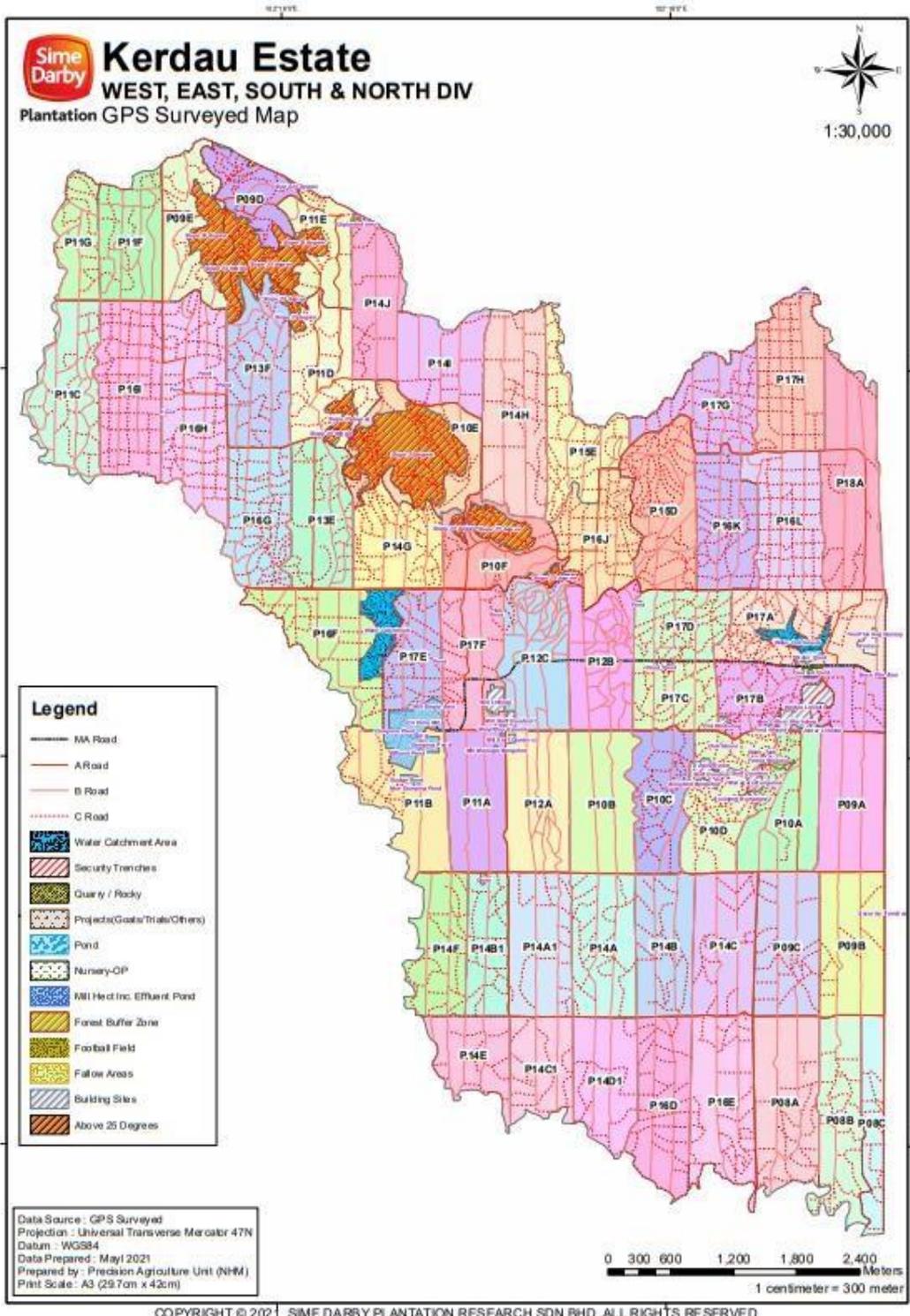
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

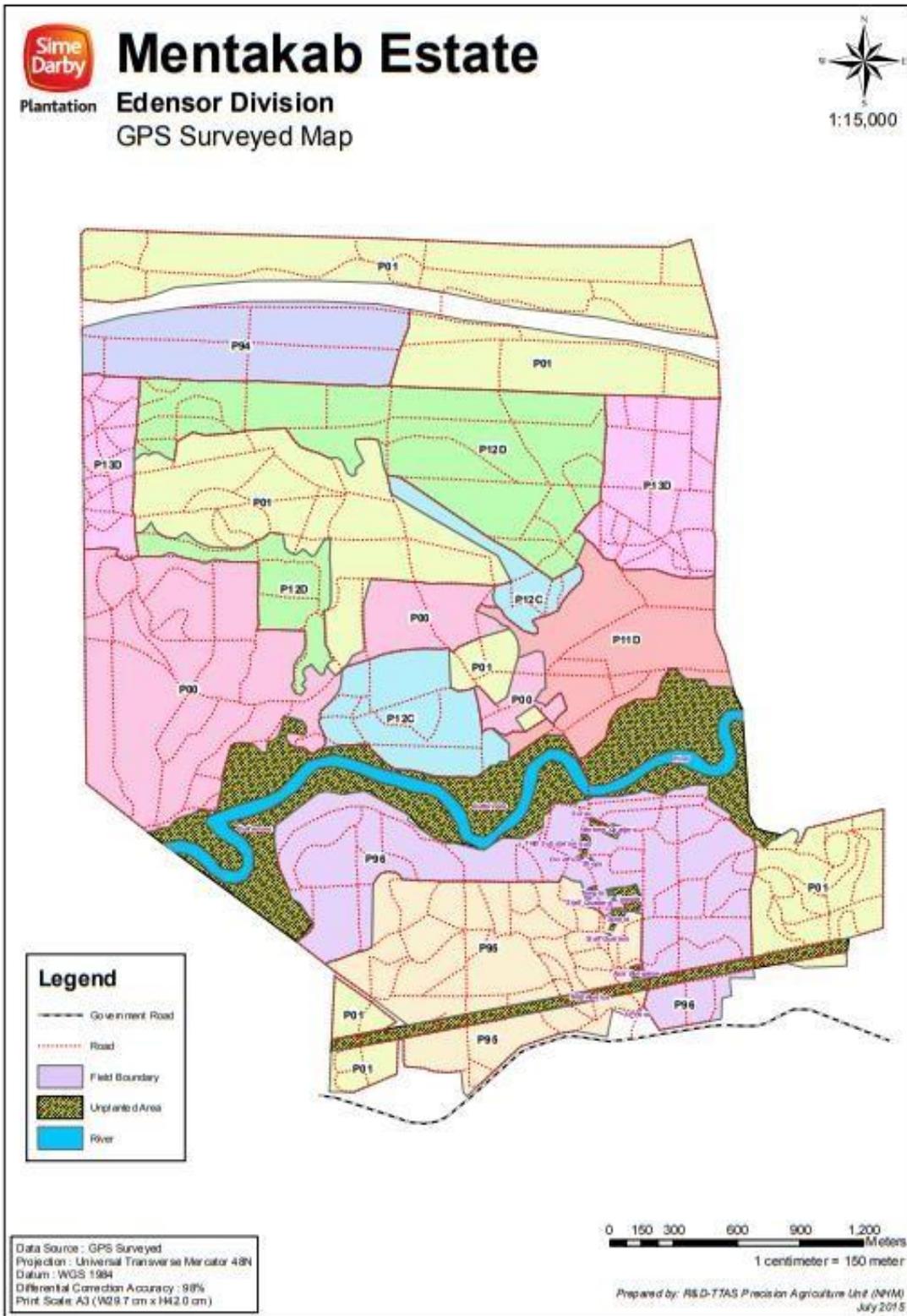
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

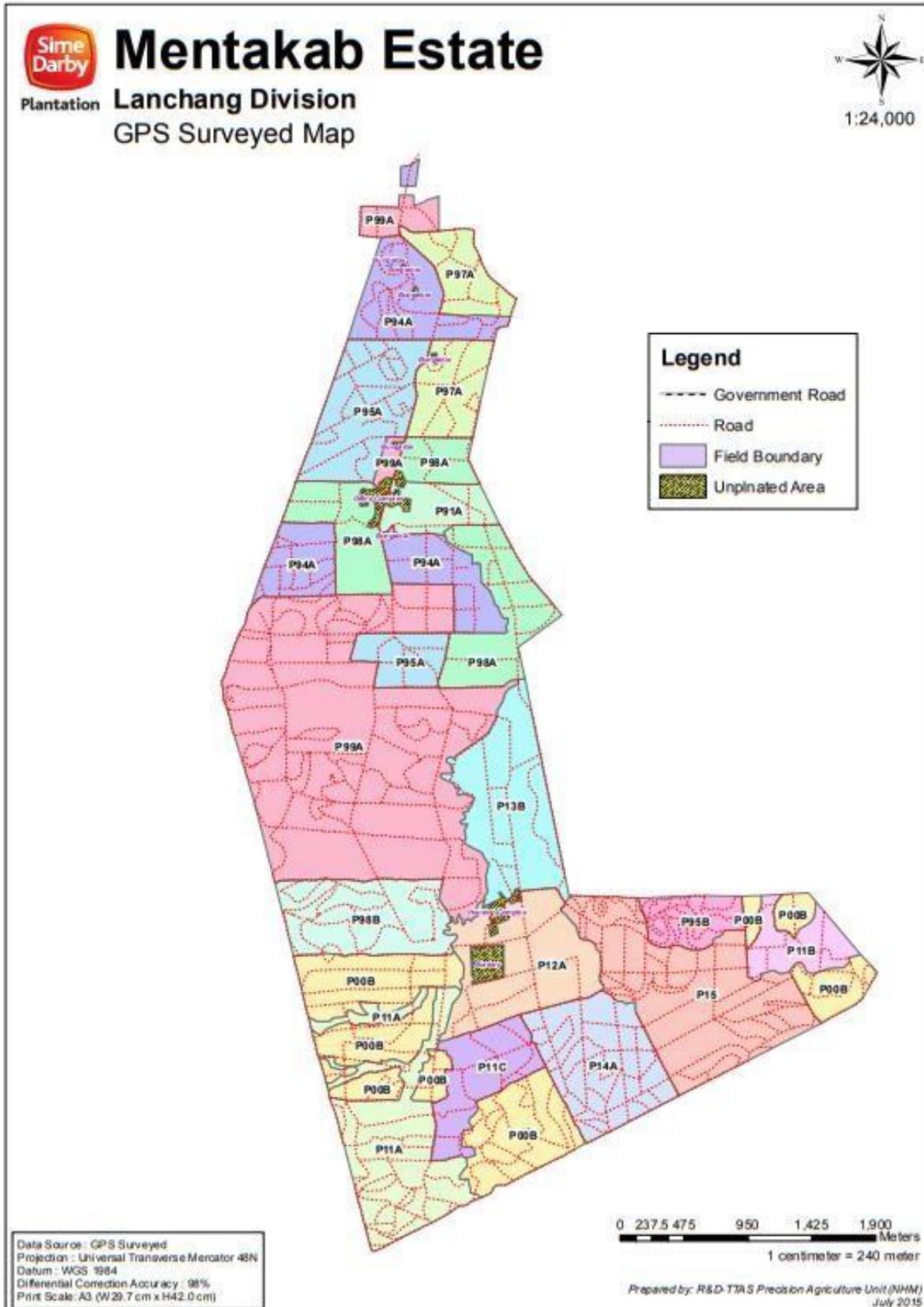
Appendix C: Location Map of Certification Unit and Supply bases

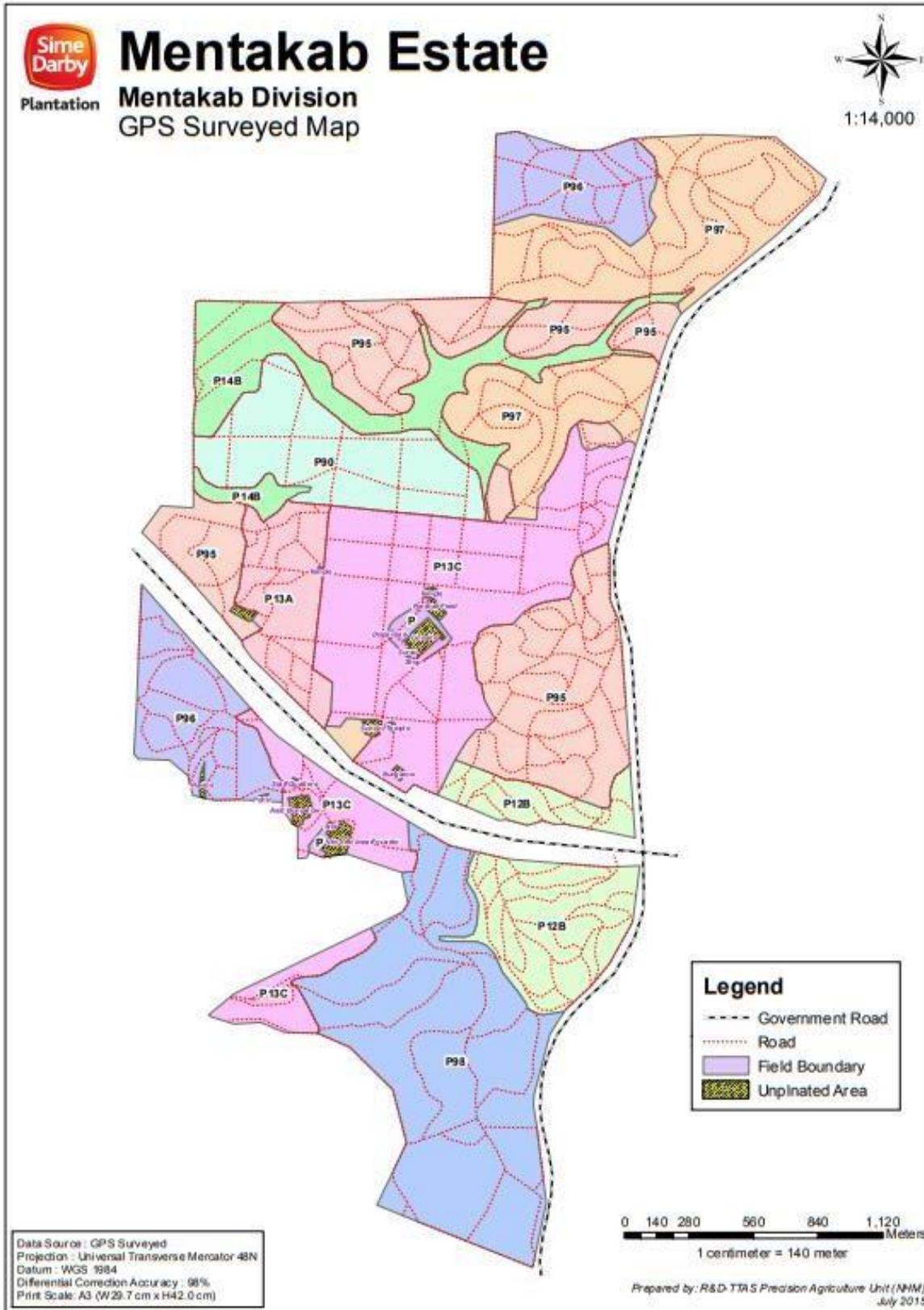


Appendix D: Estate Field Map

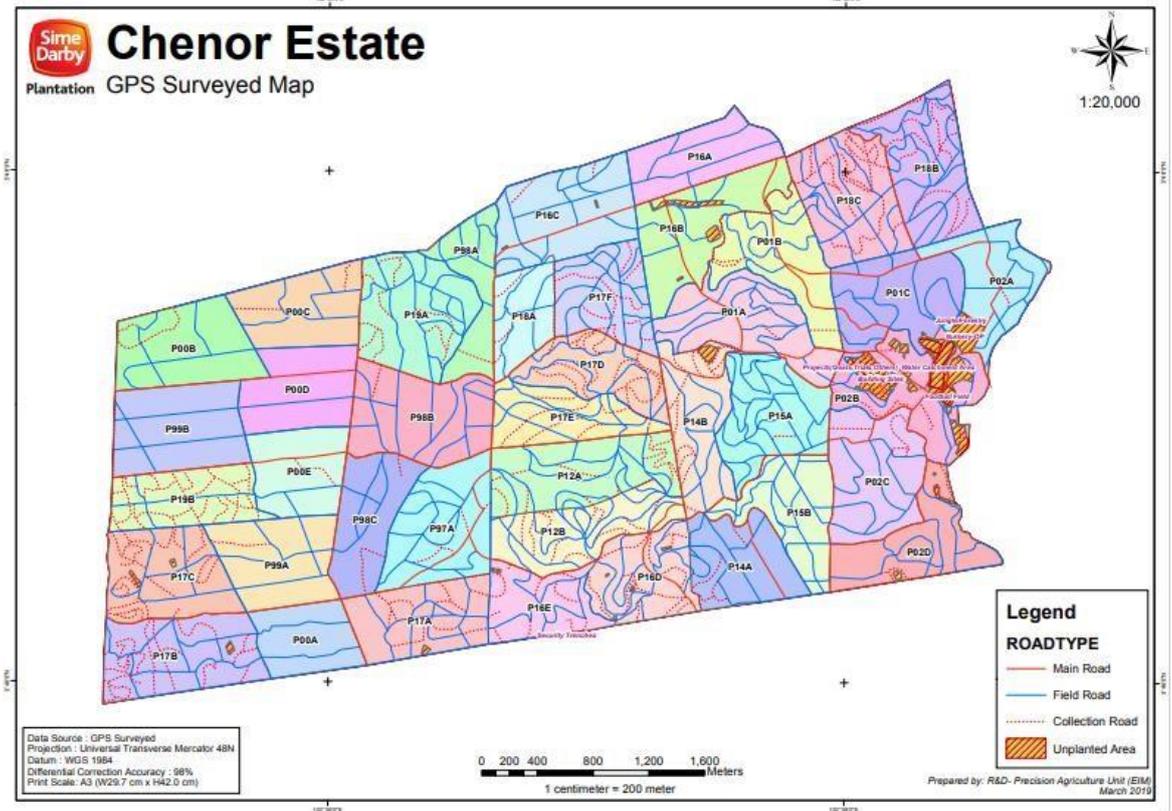








RSPO P&C Public Summary Report
Revision 13 (Apr 2022)



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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