

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (1_4)
- Recertification Assessment (Choose an item.)
- Extension of Scope

SIME DARBY PLANTATION BERHAD
Client Company / Parent Company Address: Level 5, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 19) – Pagoh Palm Oil Mill
Location of Certification Unit: Lot 2159, Ladang Pagoh, Mukim Jalan Bakri, Muar 84309, Johor, Malaysia
Date of Final Report: 25/01/2023

TABLE of CONTENTS	Page No
Section 1: Scope of the Assessment.....	3
1. Company Details	3
2. Certification Information	3
3. Other Certifications.....	4
4. Location(s) of Mill & Supply Bases	4
5. Description of Supply Base	4
6. Plantings & Cycle.....	5
7. Summary of Certified Tonnage of FFB (Own Certified Scope)	5
8. Summary of Certified Tonnage of FFB (from other certified unit(s))	5
9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate).....	6
10. Summary of Certified Tonnage (MT) (not applicable for ISS)	7
11. Summary of Actual Volume sold	8
12. Independent Smallholders Certified Tonnage (MT) / Volume	10
13. Independent Smallholders Actual Sold Tonnage / Volume	11
Section 2: Assessment Process	12
2.1 Assessment Methodology, Programme, Site Visits.....	12
2.2 BSI Assessment Team	13
2.3 Assessment Plan	15
Section 3: Assessment Findings	18
3.1 Multiple Management Units and Time Bound Plan.....	18
3.2 Progress of scheme smallholders and/or outgrowers.....	22
3.3 Details of Nonconformities	40
3.3.1 Status of Nonconformities Previously Identified and Observations.....	47
3.3.2 Summary of the Nonconformities and Status.....	51
3.4 Stakeholders and previous land owner / user consultation.....	52
3.5 Impartiality and conflict of interest	53
Formal Signing-off of Assessment Conclusion and Recommendation	54
Appendix A: Summary of Findings	55
Appendix B: GHG Reporting Executive Summary	169
Appendix C: Location Map of Certification Unit and Supply bases.....	171
Appendix D: Estate Field Map.....	172
Appendix E: List of Smallholder Registered and/or sampled	175
Appendix F: List of Abbreviations.....	176

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 5, 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 19) – Pagoh Palm Oil Mill		
Location / Address	Lot 2159, Ladang Pagoh, Mukim Jalan Bakri, Muar 84309, Johor, Malaysia		
Website	www.simedarbyplantation.com		
Management Representative	Shylaja Devi Vasudevan Nair Tn. Mohd Fadzil Bin Hasbullah	E-mail	shylaja.vasudevan@simedarbyplantation.com
Telephone	+603-78484379 +606-9857427	Facsimile	+603 7848 4363

2. Certification Information			
Certificate Number	RSPO 600305	Certificate Start Date	28/01/2019
Date of First Certification	28/01/2014	Certificate Expiry Date	27/01/2024
Scope of Certification	Production of Crude Palm Oil and Palm Kernel		
Visit Objectives	The objective of the assessment was to conduct an annual surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by Pagoh 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 1_4) <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	45 Mt/Hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 682037	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services (M) Sdn Bhd	27/12/2022
MSPO 685822	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3	BSI Services (M) Sdn Bhd	27/12/2022
MSPO 714136	MSPO Supply Chain Certification 2018	BSI Services (M) Sdn Bhd	04/09/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Pagoh Palm Oil Mill	Lot 2159, Ladang Pagoh, Mukim Jalan Bakri 84309 Muar, Johor.	2° 04' 40.62" N	102° 43' 07.30" E
Pagoh Estate	Lot 2159, Ladang Pagoh, Mukim Jalan Bakri 84309 Muar, Johor.	2° 04' 40.62" N	102° 43' 07.30" E
Lanadron Estate	Panchor 84500 Muar, Johor	2° 10' 48.70" N	102° 44' 04.00" E
Pengkalan Bukit Estate	Mukim Jalan Bakri 84309 Muar, Johor	2° 07' 29.80" N	102° 44' 32.00" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pengkalan Bukit Estate	2,961.60	2.87	147.94	3,112.41	95.15
Lanadron Estate	1,561.96	19.41	117.22	1,698.59	91.96
Pagoh Estate	1,988.02	9.10	328.81	2,325.93	85.47
Total	6,511.58	31.38	593.97	7,136.93	90.86

Note:

- Pengkalan Bukit Estate: Difference in Planted Area and Total Area is due to land being sold to KWJ Nursery & Land Acquired by Government Agency (BAKAJ Project).
- Lanadron Estate: The leasing of Lanadron Division (265.85 Ha) was discontinued. The land was acquired by SD Property in September 2021.

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Pengkalan Bukit Estate	395.46	1,031.63	1123.13	411.38	2,566.14	395.46
Lanadron Estate	236.92	467.83	754.52	102.69	1,325.04	236.92
Pagoh Estate	230.66	1,104.33	513.58	139.45	1,757.36	230.66
Total (ha)	863.04	2,603.79	2391.23	653.52	5,648.54	863.04

Note: Only Mature area is considered as production area

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 22 - Dec 22)	Actual (Oct 2021 – Sept 2022)		Forecast (Jan 23 - Dec 23)
		Previous license period (Oct 21 – Dec 21)	Current license period (Jan 22 – Sept 22)	
Pengkalan Bukit Estate	55,000.00	9,426.53	22,387.98	41,695.92
Lanadron Estate	50,070.00	5,657.51	14,522.07	26,964.42
Pagoh Estate	40,600.00	6,752.65	18,851.90	37,952.00
Total	145,670.00	77,598.64		106,612.34

Note: the variance between the estimate and actual production is due to the high labour shortage at the certification unit, which in return caused reduced harvested yield

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 22 - Dec 22)	Actual (Oct 2021 – Sept 2022)		Forecast (Jan 23 - Dec 23)
		Previous license period (Oct 21 – Dec 21)	Current license period (Jan 22 – Sept 22)	
Tangkah Estate		-	47.61	
Muar River Estate		89.13	-	
Total		136.74		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 22 - Dec 22)	Actual (Oct 2021 – Sept 2022)		Forecast (Jan 23 - Dec 23)
		Previous license period (Oct 21 – Dec 21)	Current license period (Jan 22 – Sept 22)	
OCP (Outside Crop Producers)	-	8,437.91	50,342.80	-
Total	-	58,780.71		-

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	Oct-21	6,507.44	2,645.15	9,152.59
2	Nov-21	8,379.63	2,710.22	11,089.85
3	Dec-21	7,038.75	3,082.54	10,121.29
4	Jan-22	5,296.13	2,800.82	8,096.95
5	Feb-22	5,465.89	2,984.56	8,450.45
6	Mar-22	7,264.99	5,125.92	12,390.91
7	Apr-22	7,241.78	7,804.01	15,045.79
8	May-22	6,559.36	7,112.87	13,672.23
9	Jun-22	7,029.57	10,755.78	17,785.35
10	Jul-22	6,407.25	8,385.61	14,792.86
11	Aug-22	4,476.19	3,306.40	7,782.59
12	Sep-22	6,068.40	2,066.83	8,135.23
	TOTAL	77,735.38	58,780.71	136,516.09

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Jan 22 - Dec 22)	Actual (Oct 2021 – Sept 2022)		Forecast (Jan 23 - Dec 23)
	Previous license period (Oct 21 – Dec 21)	Current license period (Jan 22 – Sept 22)	
FFB	FFB		FFB
145,670.00 mt	21,925.82 mt	55,809.56 mt	106,612.34 mt
	TOTAL	77,735.38 mt	
CPO (OER: 21.83 %)	CPO (OER: 19.41 %)		CPO (OER: 21.80 %)
31,800.00 mt	4,511.651 mt	10,577.902 mt	23,241.49 mt
	TOTAL	15,089.55 mt	
PK (KER: 5.33 %)	PK (KER: 5.46 %)		PK (KER: 5.37 %)
7,760.00 mt	1,124.86 mt	3,117.07 mt	5,725.08 mt
	TOTAL	4,241.93 mt	

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Oct-21	1,325.364	344.78
2	Nov-21	1,725.287	430.73
3	Dec-21	1,461.001	349.34
4	Jan-22	1,044.84	259.72
5	Feb-22	1,071.10	399.28
6	Mar-22	1,420.97	363.18
7	Apr-22	1,393.94	394.54
8	May-22	1,258.02	428.21
9	Jun-22	1,307.56	368.09
10	Jul-22	1,219.49	341.12
11	Aug-22	805.02	232.62
12	Sep-22	1,056.96	330.32
	TOTAL	15,089.55	4,241.93

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

11. Summary of Actual Volume sold					
Current License period (Jan 22 – Sept 22)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	2,487.34	0	0	0	2,487.34
PK (MT)	5,078.52	0	0	0	5,078.52
Credits	3,000	0	0	0	3,000
Previous License period (Oct 21 – Dec 21)					
CPO (MT)	0	0	0	0	0
PK (MT)	1,520.30	0	0	0	1,520.30
Credits	8,000	0	0	0	8,000

Note:

- Conventional is RSPO certified material but sold as non-RSPO.
- Based on the verification of the Mill’s Production and Sales Registered in RSPO PalmTrace for the period under review (Oct 2021 to Sept 2022), it was found that the mill has oversold 2,356.89 mt of RSPO certified PK (as of Aug 2022) more than its stock balance. Negative stock was documented for 9 consecutive months. Hence a Critical Non-conformity has been raised under indicator 3.8.12 as can be seen in section 3.3. The Mill have established correction and corrective action plans to address the issue which has been verified and successfully closed on 10/01/2023.

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	XXX	TR-028dc5f9-c77f TR-2540fb46-418b TR-28ecd672-3867 TR-2fae6567-4eb9 TR-30af8a02-63d0 TR-35b72fac-e200 TR-47c59060-de9c TR-4b900d66-abf3 TR-4beb443c-d86f TR-50d544d4-638d TR-50f6ce61-6aba TR-5d066d1a-02f0 TR-5d7362ca-e078 TR-5fef8f6c-cc4a TR-6527ce7f-4c97 TR-78ba0b54-f488 TR-8813566b-c9ca TR-8bb9bf74-1f0c	-	6,598.82

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		TR-8d6cfd3b-d29a TR-9166ff95-be23 TR-92080a30-c972 TR-98735024-7519 TR-a57969c2-de7c TR-b21b8123-9fe0 TR-b58e1928-5296 TR-c8800ec3-83d9 TR-d85fd285-6c55 TR-da89eed1-004b TR-df074a22-2025 TR-ea202206-e711 TR-ed11718e-a2b7 TR-ed903fd9-fb00 TR-ee05eee7-5c7b TR-f13125f7-c33a TR-f49556a6-165e TR-fc506938-14c5		
2	XXX	TR-5107b58f-c3b1 TR-b72695fb-7cf0	398.84	-
3	XXX	TR-fce82055-5dc1 TR-bf35114a-4296 TR-e37fd8e8-12ed	39.61	-
4	XXX	TR-da895215-252e TR-536ec77c-0ffc TR-a969e81e-2739 TR-34b02fda-a71b TR-af59ff18-27f5 TR-cf101a3b-531c TR-a184f57c-776e TR-5ec90ccf-627f TR-e67f2fd9-17e5 TR-c5b6fcb4-04c0 TR-74618c51-c31a TR-3a924a28-eb84	2,048.89	-
TOTAL			2,487.34	6,598.82

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)
-	-	-	-	-
TOTAL			-	-

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
-	-	-	-
TOTAL		-	-

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
1.	XXX	ST-TR-3aa2ccdcd-a786	3,000
2.	XXX	ST-TR-0004d2ab-34a ST-TR-9d72dcef-2319	5,000
TOTAL			8,000

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Not applicable)			Actual (Not applicable)			Forecast (Not applicable)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			-			-			-
IS-CSPO	-	-		-	-		-	-	
IS-CSPKO	-	-		-	-		-	-	
IS-CSPKE	-	-		-	-		-	-	
CSPK	-	-		-	-		-	-	

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

Note: 1 mt = 1 credit

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

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

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639

Representative: Dr. 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 **11/10/2022 – 14/10/2022**. 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 off-site (remote) assessment was conducted on **10/01/2023**. The audit programs are included in Section 2.3. Prior to the verification, the certification unit have provided all relevant documents in relation to the correction and corrective actions that they have implemented. The lead Auditor has reviewed the documents and found them sufficient to be able to close the raised critical nonconformities. The remote offsite assessment conducted via Microsoft teams and Whatsapp Video Calls were to remotely visit the site for site inspection and to interview the sampled workers on implementation of the corrective action plans which was successfully done on the date mentioned above.

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

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

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.

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 (Recertification)	Year 2 (ASA 1-1)	Year 3 (ASA 1-2)	Year 4 (ASA 1-3)	Year 5 (ASA 1-4)
Pagoh POM	✓	✓	✓	✓	✓
Pagoh Estate	✓	✓	✓	✓	✓
Pengkalan Bukit Estate	✓	✓	✓	✓	✓
Lanadron Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: October 9, 2023 - October 12, 2023

Total Number of Mandays: 12 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Vijay Kanna Pakirisamy (VKP)	Team Leader	<p>Education: Holds a Bachelor Degree in Agribusiness Science Management with Honours, University Utara Malaysia.</p> <p>Work Experience: He has 10 years’ experience in Oil Palm Estate Management in leading Oil Palm Companies such as KL Kepong Bhd, IOI Plantations and United Plantations. The last position held was Senior Assistant Manager. His experience includes the day-to-day estate operations and ensured the implementation of RSPO, ISCC and MSPO certification. He has been an sustainable palm oil auditor since 2019.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, Endorsed MSPO Lead Auditor Course, HCV & HCS Introductory Training, SMETA Requirements Training, and Endorsed RSPO Independent Smallholder (IHS) Auditor Training.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, legal requirements, environmental aspects, HCV requirements and RSPO supply chain requirements.</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>Language proficiency: He is fluent in English, Bahasa Malaysia, Tamil languages.</p>
Mohamed Hidhir bin Zainal Abidin (MHZ)	Team Member	<p>Education: Holds a Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006.</p> <p>Work Experience: 4½ years working experience in palm oil industry specifically in palm oil mill as Mill Engineer. More than 10 years of auditing experience with accredited certification body for several schemes include ISO9001, ISO14001, OHSAS18001 (now ISO45001), RSPO, MSPO and RBA Labor Ethics</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, MSPO Awareness Training, Endorsed RSPO SCCS Lead Auditor Course, HCV & HCS Introductory Training, SMETA Requirements Training and Endorsed RSPO Independent Smallholder (IHS) Auditor Training.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of legal, social, and stakeholder engagement.</p> <p>Language proficiency: He is fluent in Bahasa Malaysia and English languages.</p>
NorHalis AbuZar (NHA)	Team Member	<p>Education: Holds a Bachelor of Science in Plantation Technology and Management, University Technology Mara</p> <p>Work Experience: He has 6 years' experience in Oil Palm Estate Management with Kulim Plantations Sdn. Bhd. The last position held was Assistant Manager. His experience includes the day-to-day estate operations and ensured the implementation of RSPO, ISCC and MSPO certification. He is a qualified Lead Auditor for MSPO and has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p>Training attended: He has completed ISO IMS 9001 and 14001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor Course, ISO 45001 Lead Auditor Course, ISO 9001:2015 Lead Auditor Course, MSPO SCCS Auditor Course and SMETA Requirement Training.</p> <p>Aspects covered in this audit: During this assessment, he assessed on the aspects of Occupation Health Safety requirement, HIRARC, training, GAP and RSPO supply chain requirements.</p> <p>Language proficiency: He is fluent in Bahasa Malaysia and English languages.</p>

Accompanying Persons:

Name	Role
-	-

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

2.3 Assessment Plan

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

Date	Time	Subjects	VKP	MHZ	NHA
Monday, 10/10/2022	1500 - 1900	Auditors travel to Muar.	✓	✓	✓
Tuesday, 11/10/2022	0800 - 0900	Travel from Muar to Lanadron Estate	✓	✓	✓
	0900 - 0930	Opening Meeting: - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation).	✓	✓	✓
	0930 - 1230	Lanadron Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	1230 - 1330	LUNCH BREAK			
	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Wednesday, 12/10/2022	0900 - 1230	Pengkalan Bukit Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	1230 - 1330	LUNCH BREAK			
	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder, workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Date	Time	Subjects	VKP	MHZ	NHA
Thursday, 13/10/2022	0900 - 1230	Pagoh Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, Lab, weighbridge and palm product storage area, etc.	✓	✓	✓
	1000 - 1200	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	✓	-
	1230 - 1330	LUNCH BREAK			
	1330 - 1630	Document review P1 – P7: Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCCS general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Friday, 14/10/2022	0900 - 1230	Pagoh Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓	✓
	1230 - 1330	LUNCH BREAK			
	1330 - 1600	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder, workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1600 - 1630	Verify any Outstanding Issues and Preparation for Closing Meeting	✓	✓	✓
	1630 - 1700	Closing Meeting	✓	✓	✓

Remote Critical NC Verification Plan

Date	Time	Subjects	VKP	ICT Planned
Tuesday, 10.01.2023	0930 – 1230	Opening Meeting: <ol style="list-style-type: none"> 1. Opening Presentation by Audit Team Leader. 2. Confirmation of assessment scope and finalize Audit plan 3. Verification on Critical NC: <ul style="list-style-type: none"> • 2261869-202210-M1 • 2261869-202210-M2 • 2261869-202210-M3 4. Remote Site Observation and Workers Interview 5. Document review – implemented evidence 	✓	Microsoft Teams & WhatsApp
	1230 – 1300	Closing Meeting	✓	

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. SDP TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	Yes. All estates and mill has been certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 1st Oct 2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera was sold and currently SDP have no control in the management. 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): http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations	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. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	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. As the latest TBP, all units will be certified on 2023. SDP has submitted the latest TBP to be approved by RSPO Secretariat. As per reply from Deputy Director of Compliance, RSPO Secretariat on 26/01/2022, for RSPO	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>membership date before 1st July 2018, the new TBP is before 30th June 2023. Since SDP TBP is within June 2023, no approval is required from RSPO Secretariat.</p>	
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Yes.</p> <p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties was sold and currently Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019. Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & 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 2021 has been cross-referenced as below: https://rspo.org/members/1-0008-04-000-00/</p>	<p>Complied</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>		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

<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</p> <ol style="list-style-type: none"> 1. NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyplantation-berhad-nbpol-poliamba-limited 2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-a-subsidiary-of-sime-darby-plantationbhd-guadalcanal-plain-palm-oil-ltd 3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-ramuagri-industries-ltd 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 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 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 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 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 9. NBPOL (J estate) 01/11/2013 – no comments 	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-j-estate 10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-limited-higaturu-oil-palm 11. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc-new-planting-assessment 12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment1 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 Management units for 11 – 13 above were disposed.</p>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as both sites was disposed. The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancy between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of August 2022, 16 LUCAs review completed with remaining 8 concept note required, 7 concept note approved by RSPO and 1 Concept note endorsed. Land Conflicts in the resolving process.</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</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	company is committed to delivery their business complying to the laws and regulations of the country.	
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue are mainly awaiting for Land Titles. The last audit was conducted between Jun 2022 – August 2022. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no labour disputes and legal compliance is monitored during the internal audit as the positive assurance. Land disputes are currently in the resolving process.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No 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 included in the scope of certification.	Not Applicable

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					

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

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

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

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

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

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

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

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

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

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

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

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

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

SDP - RSPO Certification for Time Bound Plan - Indonesia Operations

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

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

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

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

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

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

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

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

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

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

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

Notes:

Minamas, support smallholders through two programmes: the Kredit Koperasi Primer Anggota (KKPA) and Pola Inti Rakyat (PIR) schemes. SDP is supporting smallholders' efforts to become RSPO certified through these programmes. In 2014, the first group of KKPA smallholders in Indonesia achieved certification. As of December 2021, some 14,768 scheme smallholders, representing 52% of our scheme smallholders, are RSPO certified. This number is on the uptrend. However, our efforts were hampered by challenges in obtaining land titles and meeting the associated regulatory requirements related to land. However, SDP is committed to supporting scheme landholders, aiming at 100% certification by June 2023.

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					

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		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 (Paddock) Estate					
		Surinam Estate					
		Dumpu Estate					
		Ngaru Estate					
		J Estate (Jephcott) Estate					
		Smallholders - Madang VOPs (71)					
		Smallholders - Morobe VOPs (253)					
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	-	Oro Bay Province, PNG	Certified	01/02/2013	-
		Mamba Oil Mill					
		Embi Estate					
		Ambogo Estate					
		Sangara Estate					
		Sumbiripa Estate					
		Mamba Estate					
		Sambogo Estate					

		Scheme Smallholder Sorovi Division(2019)					
		Scheme Smallholder Saiho Division(842)					
		Scheme Smallholder Aeka Division (911)					
		Scheme Smallholder Igora Division (1367)					
		Scheme Smallholder Ilimo Division (671)					
6	West New Britain (WNB)	Mosa Oil Mill	-	Kimbe, West New Britain, PNG	Certified	10/09/2008	-
		Kumbango Oil Mill					
		Kapiura Mill					
		Numundo Mill					
		Waraston Mill					
		Bebere Estate					
		Kumbango Estate					
		Togulo Estate					
		Dami Estate					
		Waisisi Estate					
		Kautu Estate					
		Karausu Estate					
		Moroa Estate					
		Bilomi Estate					
		Loata Estate					
		Haella Estate					
		Garu Estate					
		Daliavu Estate					

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

3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment there were Three (3) Critical nonconformities raised. The SOU 19 Pagoh 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 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 #	2261869-202210-M1	Issued Date	14/10/2022
Due Date	11/01/2023	Closure Date	10/01/2023
Indicator & Category (Critical / Minor)	3.8.12 (Critical)		
Statement of Nonconformity:	Mass Balance Records were not accurately computed, and the Mill has oversold CSPK more than the volume in stock.		
Requirement Reference:	Record keeping i) For Mass Balance Module, the mill: 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.)		
Objective Evidence:	Nonconformities on the implementation of Supply Chain Records and Transactions were verified as below. 1. Based on the verification of the Mill’s Production and Sales Registered in RSPO PalmTrace for the period under review (Oct 2021 to Sept 2022), it was found that the mill has oversold 2,356.89 mt of RSPO certified PK (as of Sept 2022) more than its stock balance. Negative stock was documented for 9 consecutive months. 2. The mass balance account was not documented accurately as it did not show the correct volume for ‘Balance’ and ‘Carry Forward’ for CPO & PK.		
Corrections:	1. The Mill has halted dispatch of certified sustainable PK (CSPK) effective from 14/10/2022. 2. The oversold CSPK was communicated to the PIC in GTM for their attention on 17/10/2022. 3. The ceasing of dispatch of CSPK will continue for approximately 6 months (until end of license period) to recover the volume of CSPK. 4. The Mass Balance Sheet has been revised to contain correct formula for stock balance from certified volume.		
Root Cause Analysis:	1. The uploading in RSPO Palm Trace for KKS Pagoh was done by Global Trading Marketing (GTM) at Group level. 2. The Mill only Dispatch PK as per sales contract given by GTM. 3. The monitoring of the outgoing product from the Mill is being done through a mass balance sheet. Nonetheless the MB sheet contain misleading formula for stock balance for certified sustainable CPO and PK.		

	4. The actual stock balance in Mill was not communicated to GTM.
Corrective Actions:	<ol style="list-style-type: none"> 1. The Mill Management to monitor outgoing product through a revised MB Sheet 2. The Mill Management to identify any short sell and to recover within 3 months. 3. The Mill Management to communicate to GTM & RSQM for negative stock balance for CSPO and CSPK.
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Based on the recent Palm Trace transactions, there were no sales of CSPK from Pagoh Palm Oil Mill. The last shipment was dated 15/10/2022. Mill Despatch records were also verified and there were no sales of CSPK recorded as well. 2. The mill has informed GTM on the non-conformity raised and the oversale of CSPK. This was verified in the email dated 17/10/2022. Email dated 20/12/2022 stated that all CSPK despatch is halted and will resume based on production trend in 2023. 3. The mill has amended the Mass balance Record and has been verified to contain the accurate information of CSPO and CSPK Production, Sales and Balances. 4. A Shared folder has been created between the mill and GTM so that they can simultaneously monitor the production and balance of CPO and PK to ensure that no contracts are done for volumes that are not available or that cannot be recovered within 3 months. 5. A Mass Balance Monitoring Training has been conducted on 09/12/2022 for SCCS related personals. The training records were available for verification. <p>Prior to the verification, the certification unit have provided all relevant documents in relation to the correction and corrective actions that they have implemented. The lead Auditor has reviewed the documents and found them sufficient to be able to close the raised critical nonconformities. The remote offsite assessment conducted via Microsoft teams and Whatsapp Video Calls were to remotely visit the site for site inspection and to interview the sampled workers on implementation of the corrective action plans. The implementation of the correction and corrective action plan was deemed to be able to address the raised non-conformity. Hence the Critical Non-conformity was closed on 10/01/2023.</p>

Non-conformity			
NCR Ref #	2261869-202210-M2	Issued Date	14/10/2022
Due Date	11/01/2023	Closure Date	10/01/2023
Indicator & Category (Critical / Minor)	7.3.1 (Critical)		
Statement of Nonconformity:	Waste Management Plan found to be inadequately documented and implemented		
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:	<u>Pengkalan Bukit Estate</u> <ol style="list-style-type: none"> 1. Waste Management Plan stated that Household Waste (Housing Compound) disposed via arrangement of contractor to collect domestic waste from worker 		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>housing complex. During the site visit at the housing complex, it was verified that the domestic waste was also disposed to a pit opposite the housing compound.</p> <p>2. Visit to the mentioned pit at Pengkalan Bukit Estate, sighted that waste were not segregated prior to them being disposed at the pit. Items such as Containers contaminated with mineral oil, recyclable waste such as plastic containers, tires, fertilizer bags and plastic bottles were seen disposed at the pit. This was not in accordance with the Waste management Plan.</p> <p>Due to this being a reoccurrence of non-conformity under the same indicator, a critical non-conformity was raised.</p>
Corrections:	<ol style="list-style-type: none"> 1. Waste segregation was done into degradable waste, scheduled waste and recyclable waste. 2. The management had closed the pit hole on 13/10/2022 after completing the waste segregation. 3. Scheduled wastes were transferred and stored in a scheduled wastes store. 4. Recyclable wastes were disposed in a recycle bin
Root Cause Analysis:	<ol style="list-style-type: none"> 1. The mentioned pit was an ex deboling pit for Ganoderma palm which was not completely closed. There was inadequate training on waste management to the worker on the proper waste disposal area. 2. The linesite sweeper was using this pit to dispose garden waste (dry leaves). Eventually due to lack of awareness and understanding on segregation practices by the Estate Management, he had also disposed waste including recyclable waste during a cleaning activity at workers housing complex.
Corrective Actions:	<ol style="list-style-type: none"> 1. The Estate Management to brief all workers on estates' waste management plan that have been implemented. 2. The Estate Management will monitor through Person in Charge of Accommodation (PIOA) to ensure waste management is in line with waste management plan.
Assessment Conclusion:	<ol style="list-style-type: none"> 1. The management were able to provide pictorial evidence of cleaning and closure of the pits. The waste has been segregated and disposed in accordance with the Waste Management Plans. Records of disposal were also available for verification. During the remote assessment, the site was remotely visited via Whatsapp Video Call and it was verified that the pit has been closed and there were no evidence of waste being disposed at the location. 2. The estate management has briefed all estate workers on the waste management plan and Schedule waste management. The briefing was conducted on 28/10/2022 at the master ground. Records of training was available entitled "<i>Penerangan RSPO/MSPO Berkenaan Pengurusan Sisa Berjadual</i>". Interview conducted remotely to the Linesweeper indicated that she was aware that the waste are to be segregated and disposed in accordance with the environmental SOPs that have been established by the estate. 3. Weekly inspection was conducted by the Person In Charge of Accommodation (PIOA) at the housing complex and its surroundings. The inspection form entitled "Housing Complex/ NEST/ Community Hall Weekly Inspection (PIOA)" was available for verification. Sighted that the form has included the checklist such as "proper disposal of rubbish and no illegal dumping waste". The

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>checklist dated 05/10/2022, 21/10/2022, 29/10/2022, 15/11/2022 and 26/11/2022 was available for verification.</p> <p>Prior to the verification, the certification unit have provided all relevant documents in relation to the correction and corrective actions that they have implemented. The lead Auditor has reviewed the documents and found them sufficient to be able to close the raised critical nonconformities. The remote offsite assessment conducted via Microsoft teams and Whatsapp Video Calls were to remotely visit the site for site inspection implementation of the corrective action plans. The implementation of the correction and corrective action plan was deemed to be able to address the raised non-conformity. Hence the Critical Non-conformity was closed on 10/01/2023.</p>
--	--

Non-conformity			
NCR Ref #	2261869-202210-M3	Issued Date	14/10/2022
Due Date	11/01/2023	Closure Date	10/01/2023
Indicator & Category (Critical / Minor)	3.6.1 (Critical)		
Statement of Nonconformity:	Mitigation plans and implementation of procedures on risks and hazards were not effectively demonstrated.		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<p><u>Pengkalan Bukit Estate</u></p> <ol style="list-style-type: none"> During site visit at Manuring Operation, Field 16F Division Pagoh, it was found 1 manurer was wearing surgical mask instead N95 mask while apply Manuring Activities type NK Compact 10.5/30. It was not in line with HIRARC dated 13/08/2021; Activity 5 - <i>Applying Fertilizer, with the hazard of dusty fertilizer and the existing risk control of sufficient clean water supply, long sleeve shirt, cotton gloves, facemask N95, apron and eye goggle.</i> During site visit at field P08B main Division, harvesting area, it was seen the loose fruit attendant standing on the fully jacked scissor-lift hopper. It was not in line with "Prosedur Kerja Tatacara Kerja Pemandu Kenderaan (Traktor, Mini Traktor, JAMSA, LG) with reference PBE/OC/SOP-13, Semasa Memandu: (10) <i>Jangan Sekali-kali membenarkan sesiapa berada di atas muatan yang anda bawa samaada sewaktu anda sedang berhenti atau sedang bergerak</i>" At the same field, it was noticed that 2 scissors lift mini tractor driver were wearing wellington boots instead of safety shoes. It was not in line with "Prosedur Kerja Tatacara Kerja Pemandu Kenderaan (Traktor, Mini Traktor, JAMSA, LG) with reference PBE/OC/SOP-13, <i>Di larang menggunakan selipar / capal atau kasut yang tidak menepati ciri-ciri keselamatan yang di tetapkan. Pemakaian PPE seperti kasut keselamatan, topi keselamatan, penutup telinga dan jaket pemantul cahaya adalah diwajibkan</i>". <p><u>Pagoh POM</u></p>		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>1. During site visit at the steriliser station, it was found the operator was not wearing earplugs while in operation.</p> <p>It was not in line with Prosedur Kerja Selamat; Sterilization Mill Chargehand / Operator, Section 1 - <i>Pastikan pekerja yang bertugas di stesen ini menggunakan PPE yang sesuai seperti berikut: Topi Keselamatan, Sarung Tangan, Ear Plug and Safety Boots.</i></p> <p><u>Pagoh Estate</u></p> <p>1. During site inspection at Pagoh Estate - Workshop, found 2 bottles of used lubricant and 1 bottle of Kerosine were stored in the containers without any label.</p> <p>It was not in line with CHRA Recommendation on Organisation Control Section 5.2 (c) Labelling and Relabelling (USECHH 2000, Regulation 20 & 21), (3) <i>If the chemicals are transferred to a smaller container, relabelling is required with the chemical name or trade name as written on the original label.</i></p>
<p>Corrections:</p>	<p><u>Pengkalan Bukit</u></p> <p>1. Correction has been taken immediately to workers by providing N95 to manurers.</p> <p>2. Correction has been taken immediately to machine attendant by providing rake with longer handle to clear any clogged debris at trailer.</p> <p>3. Correction has been taken immediately to instruct workers to use safety shoes provided by the management.</p> <p><u>Pagoh POM</u></p> <p>1. Immediate action has been taken by mill management by informing the said employee to take and wear new sets of ear plugs. A warning letter has been issued to the said employee. Refresher briefing has been conducted immediately the next day morning to all sterilizer operators (both shifts) on 14/10/2022 on the importance of PPE usage with inspection on individual PPE availability during morning toolbox. Another round of briefing has been conducted to all employees on 17/10/2022 with a set of PPE inspection checklist.</p> <p><u>Pagoh Estate</u></p> <p>1. The containers used to contain chemical/ lubricant was relabelled as per requirement.</p>
<p>Root Cause Analysis:</p>	<p><u>Pengkalan Bukit</u></p> <p>1. Lack of awareness on the usage of N95 mask. There was inadequate training on PPE. There was no monitoring of PPE usage by the Management.</p> <p>2. There is no clear SOP and proper tool to clear the clogged loose fruits. There was inadequate training to the worker on the risk and hazard of standing on the hopper.</p> <p>3. Lack of training/ awareness among workers on PPE Usage even after the management has provided PPE.</p> <p><u>Pagoh POM</u></p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>1. Mill management has provided PPE to every employee and record of PPE issuance is available. There is an absence of PPE availability monitoring for each individual employee. Based on immediate investigation done on the same day, the employee said his ear plugs were damaged and he has yet to take new sets available from the store. This shows the lack of awareness on the importance of wearing hearing protection among the said employees.</p> <p>Pagoh Estate</p> <p>1. Lack of awareness on relabeling when transfer to different container. There was inadequate training on the requirement for relabeling for container.</p> <p>2. Lack of monitoring by the Management on unlabeled containers.</p>
Corrective Actions:	<p>Pengkalan Bukit Estate:</p> <p>1. To do monitoring of PPE usage during morning muster.</p> <p>2. To review SOP & HIRARC for the activity. To do briefing on the SOP.</p> <p>3. To do monitoring of PPE Usage during morning muster</p> <p>Pagoh POM</p> <p>1. Mill management has come out with daily PPE inspection checklist. Assistants Manager and Supervisors will check the usage of PPE including ear plugs/ earmuffs to all workers during morning toolbox briefing.</p> <p>Pagoh Estate</p> <p>1. Estate will provide small container with permanent labelled sticker to use as temporary container to transfer lubricant/ kerosine from large container. To provide training to workshop operators on the relabeling requirement. To do intervention using Sime Card for any unsafe condition/act.</p>
Assessment Conclusion:	<p><u>Pengkalan Bukit Estate</u></p> <p>1. The estate have established a checklist where the PPEs that are supposed to be used by the respective workers are inspected during the morning master itself. Verified the <i>"Daily Safety Briefing & Personal Protective Equipment (PPE) Checklist"</i> dated 15/11/2022 and 16/11/2022.</p> <p>2. The SOP <i>Tata Kerja Mengangkat Beg Biji Kelapa Sawit</i> (Reference Number: PBE/OC/ SOP-LOADER) has been reviewed and was available for verification. The SOP has included the safe working procedures during loose fruit collection and loading works.</p> <p>3. The HIRARC for Loose Fruit Loaders were reviewed on 15/10/2022 and available for verification. The HIRARC has stated the safe working controls that are to be implemented while loose fruit loading is being done. The management have issued rakes to the loose fruit loaders on 15/10/2022. Records of issuance was available for verification in the "Tool Use" document. Training on PPE usage and Method for loading Loose Fruits was conducted for related workers on 12/10/2022 and records were available for verification.</p> <p>4. Records for issuance of mask and safety shoes were available for verification. PPE training has been conducted on 12/10/2022 for all workers at the master ground.</p> <p>5. Interview has been conducted remotely via Microsoft Teams. The interview concluded that the related workers have been provided training on PPE and</p>

	<p>they are now aware of the importance of using appropriate PPEs during operations.</p> <p><u>Pagoh POM</u></p> <ol style="list-style-type: none"> 1. A warning letter dated 13/10/2022 has been issued to the identified worker due to not wearing ear plugs during work. The warning letter was available for verification. 2. A Personal Protective Equipment (PPE) Refresher Training has been conducted on 14/10/2022 to remind all workers to wear the appropriate and complete PPEs at each stations. The refresher training records were available for verification. 3. The mill has established a Personal Protective Equipment (PPE) Checklist to monitor the PPE usage in the mill. The daily PPE Checklist for 17/10/2022 – 23/10/2022 was available for verification. 4. Interview has been conducted remotely via Microsoft Teams. The interview concluded that the related workers have been provided training on PPE and they are now aware of the importance of using appropriate PPEs during operations. <p><u>Pagoh Estate</u></p> <ol style="list-style-type: none"> 1. The management have transferred the lubricant into a proper container and relabelled it accordingly. The appropriate symbols have also been placed on the labels and verified accordingly. 2. A training has been conducted for all workshop Personals on 20/10/2022. Verified the training record entitled "Briefing on labelling and use of right container for lubricants". 3. The estate has established a checklist entitled "<i>Pemantauan Penyelgaran Bengkel Ladang</i>" as a monitoring method to regularly monitor the works and implementations at the workshop to be in accordance with Sime Darby's SOP and the estate's best practice. <p>Prior to the verification, the certification unit have provided all relevant documents in relation to the correction and corrective actions that they have implemented. The lead Auditor has reviewed the documents and found them sufficient to be able to close the raised critical nonconformities. The remote offsite assessment conducted via Microsoft teams and Whatsapp Video Calls were to remotely visit the site for site inspection and to interview the sampled workers on implementation of the corrective action plans. The implementation of the correction and corrective action plan was deemed to be able to address the raised non-conformity. Hence the Critical Non-conformity was closed on 10/01/2023.</p>
--	--

Opportunity for Improvements	
OFI #	Description
OFI 1	-

Positive Findings	
PF #	Description
PF 1	Good Implementation of GAP across the estates.
PF 2	Good understanding by staffs and workers on GAP, H&S and Environment Protections.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2117642-202110-M1	Issued Date	13/10/2021
Due Date	27/01/2022	Closure Date	7/01/2022
Indicator & Category (Critical / Minor)	2.2.2 Major (Critical)		
Statement of Nonconformity:	Evidence of legal due diligence of contracted third parties were 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>Lanadron Estate Clause 12: Notice of termination of contract; (a) four weeks' notice if the employee has been so employed for less than two years on the date on which the notice is given;</p> <p>b) six weeks' notice if he has been so employed for two years or more but less than five years on such date;</p> <p>c) eight weeks' notice if he has been so employed for five years or more on such date:</p> <p>i. months of notice period, for contract period of 3 (three) years stated in the employment contract dated 1/3/2021 between Gunalabur (M) Sdn Bhd and signed by employee, ID no. XX06XX-01-5XXX.</p> <p>ii. 3 months of notice period, for contract period of 1 (one) year stated in the employment contract signed dated 1/1/2021 between Kim Soon Lee Transporter Sdn Bhd and signed by employee, Ubaidullah Bin Ismail.</p> <p>Clause 7: More favourable conditions of service under the Act to prevail; term or condition of service which is less favourable to an employee than a term of condition of service prescribed by this Act or any regulations,</p> <p>i. Stated in the employment contract, "Gaji akan diberikan mengikut Jumlah Gaji Minima yang ditetapkan oleh Kerajaan Malaysia." No specific rates written either the employee is under daily/piece rated package or monthly rated in the contract. Further verified in the pay slip, the given salary is RM1500 for all workers. No evidence of attendance provided to match the salary received by the workers. Refer to contract between Kim Soon Lee Transporter Sdn Bhd and the employee dated 1/1/2021. No evidence of acceptance from employee in the said contract.</p>		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>ii. Stated in the employment contract, "Gaji akan diberikan mengikut Jumlah Gaji Minima yang ditetapkan oleh Kerajaan Malaysia." No specific Assessment Report. Page 13 of 21 rates written either the employee is under daily/piece rated package or monthly rated in the contract. No evidence of attendance provided to match the salary received by the workers. Further verified in the pay slip, the given salary is RM2,000. Refer to contract between Gunalabur (M) Sdn Bhd and the employee dated 1/3/2021.</p> <p>Pengkalan Bukit Estate Based on contract between Ng Sah Leng and employee with ID no. XX12XX-01-5XXX signed dated 1/1/21, day rate given is RM95 per day, OT at RM 10 per hour. If the employee work more than 26 days in a month, the 27th day will be paid with additional 1.5 days rate of pay. RM200 allowance also will be added if the employee work for more than 26 days. Further trailed on the pay slip and attendance record in January and March 2021, the following issues were observed;</p> <p>i. January 2021 pay slip – Day rate RM90 x 21.50 working days = RM1,935 with SOCSO deduction (Form 8A January 2021) RM 43.90. The salary was not paid correctly based on contract. Total contribution for SOCSO is RM 43.90 which based on RM1900-RM2000 salary range for the said month.</p> <p>ii. March 2021 pay slip – Day rate RM95 x 27 working days = RM2,565. SOCSO deduction (Form 8A March 2021) RM 57.40. The salary was not paid correctly based on contract. Total contribution for SOCSO is RM 57.40 which based on RM2,500-RM2,600 salary range for the said month.</p>
<p>Corrections:</p>	<p>Lanadron Estate</p> <p>Contractors was informed on the clause at notice of termination. Amendment in contractor agreement has been demanded.</p> <p>Pengkalan Bukit:</p> <p>Meeting between management & contractor have been made on 23rd October 2021 on the highlighted issue. Contractors acknowledged & agreed to reimburse any shortage of payment & SOCSO contribution.</p>
<p>Root Cause Analysis:</p>	<p>There is no PIC to monitor & checking the details of the employment terms in contractors' agreement to its' workers.</p>
<p>Corrective Actions:</p>	<p>Lanadron Estate</p> <ol style="list-style-type: none"> 1. Sr Assistant was assigned to monitor and checking the employment contract terms and conditions are according to Employment Act 1955. 2. Contractor compliance audit will be covered in Internal audit conducted by Regional SQM or HQ
<p>Assessment Conclusion:</p>	<p>Verification for close NC:</p> <p><u>Lanadron Estate</u></p> <ul style="list-style-type: none"> - Kim Soon Lee Transport Sdn Bhd have new contract with workers 80XXXX-01-5023 dated 1/12/2021 already stated min wages RM 1500 as per verification. - Guna Labur already stated min wages RM 2500 as per verification under employment contract with their worker dated 01/12/2021. - Lanadron appointment letter for Mohd Nor Helmi Bin Ismail as incharge for sustainability certification of management system dated 01/11/2021 available for verification.

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<ul style="list-style-type: none"> - Briefing to contractor regarding to clause on Min wages been conducted on 26/11/2021. Attended by Gunalabur (M) Sdn Bhd and Kim Soon lee Transport Snd Bhd. This briefing conducted by Sharifah Sharina (SQM). <p><u>Pengkalan Bukit Estate</u></p> <ul style="list-style-type: none"> - Appointment letter for Mohd Azizi Bin Abd Rahim (Sr Assistant) as incharge on Sustainability Certification of Management system dated 16/10/2021. - Briefing with Ng Sah Leng conducted on 23/10/2021 to ensure the contractor understand regarding to Min wages, SOCSO requirement. - From the record verification, the contractor (Ng Sah Leng) already reimbursed the wages from previous month, the total RM 213.75 have been paid dated 1/12/2021. As per verification on Nov Payslip 2021, the payment was according to employment contract dated 1/1/2021 as per below:- RM 95 x 24 days = total 2280. - As per verification on SOCSO on November 2021 (Borang 8A) total contribution was <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>Employer</th> <th>Employee</th> <th>Total contribution</th> </tr> </thead> <tbody> <tr> <td>RM 39.35</td> <td>RM 11.25</td> <td>RM 50.60</td> </tr> </tbody> </table> <p>Therefore the Major NC was close on 07/01/2022.</p>	Employer	Employee	Total contribution	RM 39.35	RM 11.25	RM 50.60									
Employer	Employee	Total contribution														
RM 39.35	RM 11.25	RM 50.60														
Effectiveness Closure (for previous audit closed Critical NC):	<p>Evidence of due diligence of all contracted third parties recorded under checklist of contractor and vendor for 2022. Summary of evolution report verified at respective operating units as per the following:</p> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>Estate/Mill</th> <th>Date of assessment</th> <th>Rating</th> </tr> </thead> <tbody> <tr> <td>Lanadron Estate</td> <td>27/09/2022</td> <td>97% (A)</td> </tr> <tr> <td>Pengkalan Bukit Estate</td> <td>22/09/2022</td> <td>100% (A)</td> </tr> <tr> <td>Pagoh POM</td> <td>03/10/2022</td> <td>100% (A)</td> </tr> <tr> <td>Pagoh Estate</td> <td>04/10/2022</td> <td>100% (A)</td> </tr> </tbody> </table> <p>Based on the above rating, it was evident that contractor legal due diligence was closely monitored. No recurrence of issue observed thus the previous major NC was remained closed.</p>	Estate/Mill	Date of assessment	Rating	Lanadron Estate	27/09/2022	97% (A)	Pengkalan Bukit Estate	22/09/2022	100% (A)	Pagoh POM	03/10/2022	100% (A)	Pagoh Estate	04/10/2022	100% (A)
Estate/Mill	Date of assessment	Rating														
Lanadron Estate	27/09/2022	97% (A)														
Pengkalan Bukit Estate	22/09/2022	100% (A)														
Pagoh POM	03/10/2022	100% (A)														
Pagoh Estate	04/10/2022	100% (A)														

Non-conformity			
NCR Ref #	2117642-202110-N1	Issued Date	13/10/2021
Due Date	Next Assessment	Closure Date	14/10/2022
Indicator & Category (Critical / Minor)	7.3.1 (Minor)		
Statement of Nonconformity:	Found the waste management plan inadequately documented and implemented		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. - Minor compliance
Objective Evidence:	Sighted some waste such as used PPE contaminated with oil was not identified in waste management plan dated 9/1/2021 in Pagoh estate. Reviewed latest disposal record for clinical waste in Lanadron Estate was conducted on 26/8/2021 by license contractor, not accordance to waste management plan dated 3/1/2021 where supposedly disposed by VMO. The sand and saw dust contaminated with oil/chemical was sighted during site visit was not identified in waste management plan dated 18/7/2021 for Pengkalan Bukit Estate
Corrections:	The waste management plan has been revised according to each Operating units.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. The generic waste management plan was established without checking the details of the management plan 2. Lack of monitoring and identification of waste in management plan
Corrective Actions:	<ol style="list-style-type: none"> 1. PIC to review management plan on monthly basis 2. Internal audit to verify the management plan
Assessment Conclusion:	<p>The waste management plan has been revised by the operating units respectively. The internal audit team have also conducted regular monitoring on the implementation of the waste management plan. Nevertheless, during the verification assessment, it was found that there were still lack of monitoring on the established waste management plan. Evidence as below.</p> <p><u>Pengkalan Bukit Estate</u></p> <ol style="list-style-type: none"> 1. Waste Management Plan stated that Household Waste (Housing Compound) disposed via arrangement of contractor to collect domestic waste from worker housing complex. During the site visit at the housing complex, it was verified that the domestic waste was also disposed to a pit opposite the housing compound. 2. Visit to the mentioned pit at Pengkalan Bukit Estate, sighted that waste were not segregated prior to them being disposed at the pit. Items such as Containers contaminated with mineral oil, recyclable waste such as plastic containers, tires, fertilizer bags and plastic bottles were seen disposed at the pit. This was not in accordance with the Waste management Plan. <p>Due to this being a reoccurrence of non-conformity under the same indicator, a critical non-conformity was raised.</p>

Non-conformity			
NCR Ref #	2117642-202110-N2	Issued Date	13/10/2021
Due Date	Next Assessment	Closure Date	14/10/2022
Indicator & Category (Critical / Minor)	3.3.3 (Minor)		
Statement of Nonconformity:	The implementation of recommendation control measure stated in the Noise Risk Assessment was inadequate		
Requirement Reference:	Records of monitoring and any actions taken are maintained and available.		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Objective Evidence:	Pengkalan Bukit Estate The estate has conducted Noise Risk Assessment on 03/08/2021. In the recommendation control measure stated to install signage with the words "HEARING PROTECTION ZONE" at water pump house. Noted during site visit, no signage was installed.
Corrections:	To install signages as per recommended in NRA
Root Cause Analysis:	Monitoring of warning signage at water pump house not covered in routine inspection.
Corrective Actions:	To include the checking of availability of signage at water pump house during workplace inspection by safety and health committee.
Assessment Conclusion:	Verified during site visit at the Water Pump House, Pengkalan Bukit Estate (Pagoh Division), the signage on Hearing Protection Zone were installed. Water Pump Attendant was wearing ear plugs and had good awareness on the PPE that were required. Verified workplace inspection dated April 2022, May 2022 and June 2022 found that inspection on signage and use of PPE at water pump house were included and adequately monitored. Refer "Skor Pemeriksaan Tempat Kerja" Section "Tempat Rawatan Air".

Opportunity for Improvement	
OFI#	Description
OFI 1	NA

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1691857-201809-M1	Critical	4.7.2	12/10/2018	Closed out on 04/01/2019
1691857-201809-M2	Critical	2.1.1	12/10/2018	Closed out on 04/01/2019
1691857-201809-M3	Critical	6.5.2	12/10/2018	Closed out on 04/01/2019
1691857-201809-M4	Critical	4.6.5	12/10/2018	Closed out on 04/01/2019
1691857-201809-N1	Minor	4.8.2	12/10/2018	Closed out on 25/10/2019
1691857-201809-N2	Minor	2.2.2	12/10/2018	Closed out on 25/10/2019
1691857-201809-N3	Minor	4.1.2	12/10/2018	Closed out on 25/10/2019
1691857-201809-N4	Minor	4.1.3	12/10/2018	Closed out on 25/10/2019
1691857-201809-N5	Minor	6.5.4	12/10/2018	Closed out on 25/10/2019
1833344-201906-M1	Critical	4.7.1	25/10/2019	Closed out on 20/01/2020
1833344-201906-M2	Critical	5.3.2	25/10/2019	Closed out on 20/01/2020
1833344-201906-M3	Critical	6.5.1	25/10/2019	Closed out on 20/01/2020
1833344-201906-N1	Minor	6.5.3	25/10/2019	Closed out on 16/10/2020

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

1833344-201906-N2	Minor	5.6.3	25/10/2019	Closed out on 16/10/2020
1964604-202010-M1	Critical	7.2.10	16/10/2020	Closed out on 23/11/2020
1964604-202010-N1	Minor	2.2.2	16/10/2020	Escalated to Critical
1964604-202010-N2	Minor	7.11.3	16/10/2020	Closed out on 13/10/2021
1964604-202010-N3	Minor	6.7.2	16/10/2020	Closed out on 13/10/2021
2117642-202110-M1	Critical	2.2.2	13/10/2021	Closed out on 07/01/2022
2117642-202110-N1	Minor	7.3.1	13/10/2021	Escalated to Critical
2117642-202110-N2	Minor	3.3.3	13/10/2021	Closed out on 14/10/2022
2261869-202210-M1	Critical	3.8.12	14/10/2022	Closed out on 10/01/2023
2261869-202210-M2	Critical	7.3.1	14/10/2022	Closed out on 10/01/2023
2261869-202210-M3	Critical	3.6.1	14/10/2022	Closed out on 10/01/2023

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss SOU 19 Pagoh 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)
Union	NUPW Representative	Face to Face
Internal Stakeholder	Workers Representative	Face to Face
External Stakeholder	Village Head - Kg Hujung Tambak	Face to Face
Contractor	MTJJ Enterprise	Face to Face

Stakeholders comment

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

1	<p>Feedbacks: NUPW representative They informed that no pending issue during the time of audit. They will discuss with the management if there is any issue reported. Workers are paying in accordance with Minimum Wage Order 2022.</p> <p>Audit Team verification and response: Noted on the information and no further issues.</p>
2	<p>Feedbacks: Worker’s representative The workers are satisfied with the management, and they informed that their wages have achieved Minimum Wage Order 2020. They are aware of the complaint procedure. No discrimination from the management.</p> <p>Audit Team verification and response: Noted on the information and no further issues.</p>
3	<p>Feedbacks: Local Community Head (Kg Hujung Tambak) There were issues regarding to water-log/stagnant water resulting to the construction of new 11/32kV TNB sub-station. The village representative has requested for drainage cleaning near to the substation to avoid backflow and flood to the village. The other concern by them is the road condition which has been used by estate for FFB transportation.</p> <p>Audit Team verification and response: The management has communicated with TNB as the drain is under TNB management and meeting between the village and TNB on end month of Oct 2022 has been arranged. The road was not under estate area and supposed to be maintained by government department (JKR). Nonetheless, estate management has also did minor road repair (patching) for the ease of all.</p>
4	<p>Feedbacks: Contractors (MTJJ Enterprise, SM Angkut) There is no late payment issue from Estate to contractors. Agreement is valid and signed by both parties. Contractor workers’ pay slip were kept in office.</p> <p>Audit Team verification and response: Noted on the information and no further issues.</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
SDPB SOU19 Pagoh estates have undergone 2 nd cycle of replanting thus this is not applicable.					

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

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that SOU 19 Pagoh 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 19 Pagoh is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: VIJAY KANNA PAKIRISAMY	Name: SENIN BIN SUMIRIN
Company Name: BSI SERVICES MALAYSIA SDN BHD	Company Name: SDPB - LADANG PENGKALAN BUKIT
Title: CLIENT MANAGER	Title: SOU 19 CHAIRMAN
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 10/01/2023	Date: 11/01/2023

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>Sime Darby Plantation Berhad continued to use the internet to disseminate public information 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. All operating units have individual documents and records to demonstrate compliance to this indicator.</p> <p>a. The website address is http://www.simedarbyplantation.com/.</p> <p>b. Information relating to social program on education, environment, community and health, etc, Yayasan Sime Darby as the Foundation has expanded its wings from offering scholarships to outstanding and deserving individuals to funding impactful conservation, outreach and development programmes.</p> <p>c. The SDPB website address http://www.yayasansimedarby.com/.</p> <p>Figures of gender distribution within all workers categorized by management, administrative staff and workers (both permanent casual workers, piece rate workers) were made available at estate and mill office with record titled 'SEMUA – EMPLOYEE MASTER LISTING'.</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>SDPB continued to use the internet to disseminate public information relating to land titles, safety and health plans, pollution prevention plans and the procedure for complaints and grievances. The SDPSB website address is available in English at http://www.simedarbyplantation.com/.</p> <p>Sustainability policies were displayed in various locations including the main notice boards of the estates/mill and muster ground notice boards for employees and visitors to view. Interview conducted on-site with sampled internal and external stakeholders confirmed that the information provided were in appropriate languages and accessible to them.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Request by stakeholders conducted through stakeholders meeting, visitor books, letter and forms. The operating units maintain records of all request and response. Annual face to face session with stakeholder was carried out on 02/08/2022.</p> <p>Example of request for information and responses maintained including following:</p> <ul style="list-style-type: none"> - SOU19 stakeholder meeting – 02/08/2022 - Lanadron Estate: Social dialogue minute dated 28/09/2022. - Pagoh Estate: Social dialogue minute dated 12/10/2022. 	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>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.</p> <p>Procedures were briefed to external stakeholders during the consultation meeting and to all workers during workers meeting and assembly sessions from time to time.</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		Each operating unit within the SOU 19 have appointed a person in-charge for social issues who is responsible for the implementation and monitoring of the consultation and communication procedures. Records of appointment letters of the respective person in-charge were available for verification.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Both the estate and the mill continued to maintain the stakeholders information (address, contact number, nominated representatives) which included the contractors, vendors/suppliers, foreign recruitment agencies, embassy, government agencies, schools, local communities, CPO/PK customers, etc. The list of stakeholders has been established by the mill. The list was updated on for 2022 comprises of various parties, neighbouring communities and Government Agencies. The subjects discussed during the meeting held on 02/08/2022 with the presence including stakeholders among others discussed on the following subjects; a. Company Policies and SOP b. Issues relating to neighborhood and concerns c. Appointment of social liaison officer for each OU d. Explanation of 11 ILO indicators There is no major course of concern of issues highlighted during the meeting	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 -	Sime Darby Plantation Berhad has implemented Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business	Complied

		<p>processes. The policy was developed in Bahasa Malaysia and English.</p> <p>The latest Group Sustainability & Quality Policy Statement also includes the clause 'promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC) signed by Group Managing Director on 02/12/2019. The policy has been briefed to the workers during morning briefing. Besides, policies were briefed to stakeholders during the stakeholder meeting. The latest stakeholder meeting was carried out on 02/08/2022.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has established the Vendor Integrity Pledge and Vendor COBC as a due diligence for external parties engaged by Operating Units. Sighted sampled as below:</p> <ul style="list-style-type: none"> i. Dayana Trading and Services Sdn Bhd (13005253-T) ii. Kim Soon Lee Transport Sdn Bhd (578329-W) iii. MTJJ Enterprise (MA 0245462-P) 	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>SOU 19 continued to comply with all applicable legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and SQM sustainability team. SOU 19 had obtained and renewed license and permits as required by the law. Among others the licenses/permit viewed were:</p> <p><u>Pagoh POM</u></p> <ol style="list-style-type: none"> 1. MPOB License: License Number: 565809104000; License validity Period: 01/11/2022 – 31/10/2022. 2. DOE License; License Number: 006387; License validity Period: 01/07/2022 – 30/06/2023. 	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>3. BAKAJ License – License to Divert and Abstract River Water; File Number: 08/A/Muar/020; File Number: BAKAJ: 334/300/05/03/08/2; License Expiry Date: 31/12/2022.</p> <p>4. Energy Commission - Private Installation License; Serial Number: 000441/2022; Installation Number: ST(SJB)P/S/JHR/01967; License Commencement Date: 22/07/2021 (Valid for 2 year).</p> <p>5. Fire Certificate; Certificate Number: JBPM; JH/7/558/2021; Certificate Validity Period: 26/10/2021 – 25/10/2022.</p> <p><u>Pagoh Estate</u></p> <p>1. MPOB (FFB) License; License Number: 508589902000; License Validity Period: 01/05/2022 – 30/04/2023.</p> <p>2. MPOB (Nursery); License Number: 597369011000; License validity Period: 01/05/2022 – 30/04/2023.</p> <p>3. Permit Barang Kawalan Berjadual; Seril Number: P (J 002849); Reference Number: MR/PD/SK-1079 @ SKS 199; Description: Diesel; Storage Capacity: 18, 000 litres; Permit Validity Period: 03/08/2021 – 02/08/2024.</p> <p>4. BAKAJ License for Diversion and Abstraction of River Water; File Number: BAKAJ: 334/300/05/03/06/1; License Number: 06/A/Muar/011; License Expiry Date: 31/12/2022.</p> <p><u>Pengkalan Bukit Estate</u></p> <p>1. MPOB License; License Number: 62044501100; License Validity Period: 01/09/2022 – 31/08/2023.</p> <p>2. SPAN License; Class License Number: LK/3/22/01324; License Validity Period: 29/07/2022 – 28/07/2025.</p>	
--	--	--	--

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>3. BAKAJ License – Surface Water; File Number: 334/300/05/03/07/4; License Number: 07/A/Muar/121; License Expiry Date: 31/12/2022.</p> <p>4. BAKAJ License – Underground Water; File Number: BAKAJ:334/300/05/03/07/5; License Number: 07/B/Muar/120; License Expiry Date: 31/12/2022.</p> <p>5. Permit Barang Kawalan Berjadual; Serial Number: P(J005024); Reference Number: MR/PD/SK-0344 @ SKS 88; Description: Diesel; Storage Quantity: 8,000 Litres; License Validity Period: 14/09/2021 – 13/09/2024.</p> <p><u>Lanadron Estate</u></p> <p>1. MPOB License; License Number: 522273002000; License Validity Period: 01/08/2022 – 31/07/2023.</p> <p>2. BAKAJ License – License to Divert and Extract River Water; License Number: 07/A/Muar/071; File Number: BAKAJ: 334/300/05/03/07/1; License Expiry Date: 31/12/2022.</p> <p>3. Air Compressor License – Air Receiver; Registration Number: MK PMT 1873; License Expiry Date: 20/03/2023.</p> <p>4. Air Compressor License – Air Receiver; Registration Number: MK PMT 1881; License Expiry Date: 20/03/2023.</p> <p>5. Permit Barang Kawalan Berjadual; Serial Number: P(J002808); Reference Number: MR/PD/P-0007/13 @ SKS 5; Description: Diesel (Euro 2M); Storage Quantity: 14,000 Litres; Permit Validity Period: 18/06/2021 – 17/06/2024.</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008. A mechanism to ensure</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 19. GSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance.</p> <p>Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office.</p> <p>The estate has established Legal Other Requirements Register (LORR). Reviewed the latest updated FY 2022. Among the latest updated as follows:</p> <ol style="list-style-type: none"> 1. Occupational Safety and health (Amendment) Act 2022. 2. Prevention and Control of Infectious Diseases (Transition to Endemic) 2022. 3. Management Wage Order 2022. 	
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>Legal boundaries were clearly demarcated with security trenches, red and white poles and fences. No evidence of over planting or land encroachment was noticed during the site visit to the sampled boundary areas.</p> <ol style="list-style-type: none"> 1. Pagoh POM The mill was located in the Pagoh Estate. Mill boundary was demarcated with fences. 2. Lanadron Estate Sighted the boundary demarcation with security trenches and red and white pole at Field 2019B adjacent with Kampung Hulu. 3. <u>Pengkalan Bukit Estate</u> 	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		Sighted the boundary demarcated with security trenches and fences at field P14D adjacent with Kampung Panjang Sari.	
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	A list of contracted parties maintained by all operating units within SOU 19 in their respective List of Stakeholders Information FY 2022 which consists of stakeholders among Local Community Heads, Neighbours, Local Authorities, Vendors (Contractors & Suppliers).	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	Contracts contain specific clauses on meeting applicable legal requirements available in the Vendor Integrity Pledge records for sampled contractors as per below: a. Contractor: Diyana Trading & Services Sdn Bhd, FFB transportation service for Sime Darby Plantation Berhad’s estates, valid for 2 years from 1/1/22 to 31/12/23. b. Contractor: MTJJ Enterprise, to supply transport for transporting rubbish collection for Pengkalan Bukit Estate and valid until 31/12/2022. c. Contractor: Baskaran Traktor Enterprise, to supply own workers and transport to carry out various of general work and maintenance work for Sime Darby Plantation Berhad’s estate – Pengkalan Bukit Estate, valid for 1 year until 31/12/2022. d. FFB supplier: Gan Estate Contractor Sdn Bhd; MPOB License Number: 620952002000; License Validity Period: 25/04/2022 – 31/03/2023. e. Labour supply: Lotus Two Enterprise, to supply skill labour at Pagoh POM and valid until 31/7/23. f. Contract harvesting: Mohd Saiful Jamit, harvesting operation at Pagoh Estate and valid until 31/12/2022	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>Evidence of due diligence of all contracted third parties recorded under checklist of contractor and vendor for 2022. Summary of evolution report verified at respective operating units as per the following:</p> <table border="1" data-bbox="1137 499 1924 782"> <thead> <tr> <th>Estate/Mill</th> <th>Date of assessment</th> <th>Rating</th> </tr> </thead> <tbody> <tr> <td>Lanadron Estate</td> <td>27/09/2022</td> <td>97% (A)</td> </tr> <tr> <td>Pengkalan Bukit Estate</td> <td>22/09/2022</td> <td>100% (A)</td> </tr> <tr> <td>Pagoh POM</td> <td>03/10/2022</td> <td>100% (A)</td> </tr> <tr> <td>Pagoh Estate</td> <td>04/10/2022</td> <td>100% (A)</td> </tr> </tbody> </table>	Estate/Mill	Date of assessment	Rating	Lanadron Estate	27/09/2022	97% (A)	Pengkalan Bukit Estate	22/09/2022	100% (A)	Pagoh POM	03/10/2022	100% (A)	Pagoh Estate	04/10/2022	100% (A)	
Estate/Mill	Date of assessment	Rating																
Lanadron Estate	27/09/2022	97% (A)																
Pengkalan Bukit Estate	22/09/2022	100% (A)																
Pagoh POM	03/10/2022	100% (A)																
Pagoh Estate	04/10/2022	100% (A)																
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 contract documents and Vendor Integrity Pledge (VIP) records sighted in the indicator 2.2.2 above also contain clauses disallowing child, forced and trafficked labour. No young workers are employed by contractors and vendors.</p>	Complied															
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>																		
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> Information on geo-location of FFB origins Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>Pagoh POM receives RSPO certified FFB from the Sime Darby Plantation Berhad estates, mainly from Pagoh Estate, Lanadron Estate and Pengkalan Bukit Estate or other if any are from diversion from the sister mills as results of breakdown or annual maintenance. The mill also receives non certified FFB from 9 FFB suppliers. The mill maintains all records as per indicator of all the FFB suppliers. Sampled the records as below.</p> <ol style="list-style-type: none"> FFB Supplier: Gan Estate Contractor Sdn Bhd; MPOB License Number: 620952002000; License Validity Period: 25/04/2022 – 31/03/2023. 	Complied															

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>2. Pembangunan Pertanian Melaka Sdn Bhd; MPOB License Number: 506244915000; License Validity Period: 01/09/2021 – 31/08/2022.</p> <p>3. FFB Supplier: Eng Huat Latex Concentrate Sdn Bhd; MPOB License Number: 505907315000; License Validity Period: 01/05/2022 – 30/04/2023.</p>	
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>There were 5 indirectly sourced FFB (collection centers) and the mill is in the process of collecting the info described in 2.3.1.</p> <ol style="list-style-type: none"> 1. Pembangunan Pertanian Melaka Sdn Bhd 2. Sin Chin Joo Sdn Bhd 3. Tai Hwa Sdn Bhd 4. EG Jaya Sdn Bhd 5. BP Realty & Plantation 	Complied
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>			
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>A business plan for 5 years has been documented. SOU 19 certification unit has established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. Annual business plan in the form of annual budget and the projection for 5 years (2023-2027) were prepared as guidance for future planning.</p> <p>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. In the 5 years business plan include items as follows:</p> <ol style="list-style-type: none"> a) Palm oil mill <ol style="list-style-type: none"> i. Mill intake – FFB input ii. Production of CPO 	Complied

		<ul style="list-style-type: none"> iii. Production of PK iv. Total Palm Oil Extraction v. Total Palm Kernel Extraction vi. Mill cost b) Oil Palm Estate <ul style="list-style-type: none"> i. Total crop projection and yield potential ii. Activity direct cost <ul style="list-style-type: none"> a. Mature upkeep b. Manuring c. Harvesting and collection d. Transportation e. Nursery iii. Estate administration <ul style="list-style-type: none"> a. Admin Cost iv. Labour overhead v. Road and bridges vi. Cost of production. <p>The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2027) and well documented upon request.</p>	
--	--	---	--

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

<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>An annual replanting programme for incoming 5 years has been documented. Refer SOU 19 Replanting programme 2023 - 2027. Replanting planned for the palm older than 25 years, non-performance field (yield) and ganoderma infected palm. Long range replanting program for SOU 19 for the next 5 years as follows:</p> <table border="1" data-bbox="1137 579 1926 810"> <thead> <tr> <th>Estate</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>Pagoh Estate</td> <td>139.45</td> <td>78.70</td> <td>166.96</td> <td>100.28</td> <td>0.00</td> </tr> <tr> <td>Lanadron Estate</td> <td>0.00</td> <td>114.69</td> <td>100.75</td> <td>74.82</td> <td>0.00</td> </tr> <tr> <td>Pengkalan Bukit Estate</td> <td>187.26</td> <td>227.11</td> <td>77.21</td> <td>123.02</td> <td>127.36</td> </tr> </tbody> </table>	Estate	2023	2024	2025	2026	2027	Pagoh Estate	139.45	78.70	166.96	100.28	0.00	Lanadron Estate	0.00	114.69	100.75	74.82	0.00	Pengkalan Bukit Estate	187.26	227.11	77.21	123.02	127.36	<p>Complied</p>
Estate	2023	2024	2025	2026	2027																						
Pagoh Estate	139.45	78.70	166.96	100.28	0.00																						
Lanadron Estate	0.00	114.69	100.75	74.82	0.00																						
Pengkalan Bukit Estate	187.26	227.11	77.21	123.02	127.36																						
<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>Procedure of Management Review Meeting was addressed in the Sustainable Supply Chain and Traceability Procedure For Upstream Malaysia, Document No: SD/SDP/GSD/SCCS/0522/01 dated 01/06/2022 Section 20.0 Management Review. Management review was conducted on annually basis by Operating Unit as per SOP established. Latest management review meeting was conducted at each operating units as follows:</p> <table border="1" data-bbox="1137 1066 1921 1321"> <thead> <tr> <th>Operating Unit</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Pagoh POM</td> <td>09/09/2022</td> </tr> <tr> <td>Pagoh Estate</td> <td>24/08/2022</td> </tr> <tr> <td>Lanadron Estate</td> <td>22/08/2022</td> </tr> <tr> <td>Pengkalan Bukit Estate</td> <td>26/08/2022</td> </tr> </tbody> </table> <p>The minutes of meeting were verified. The topic discussed in the meeting were:</p>	Operating Unit	Date	Pagoh POM	09/09/2022	Pagoh Estate	24/08/2022	Lanadron Estate	22/08/2022	Pengkalan Bukit Estate	26/08/2022	<p>Complied</p>														
Operating Unit	Date																										
Pagoh POM	09/09/2022																										
Pagoh Estate	24/08/2022																										
Lanadron Estate	22/08/2022																										
Pengkalan Bukit Estate	26/08/2022																										

		<ol style="list-style-type: none"> 1. Introduction 2. Matters Arising 3. Review on status / issue of input and output 4. Sustainability management 5. Changes that could affect the management system 6. Recommendation for improvement 7. Other matters 8. Conclusion 	
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -</p>	<p>The estates and mill have established the main social and environment improvement plans as stated in the Social Impact Assessment Plan and Environmental Management Plan. The Action plans were developed based on the areas and issues of concern that have been raised. Continuous Improvement Plan developed as per the following: <u>Pagoh POM</u></p> <ol style="list-style-type: none"> 1. Workers Housing - Improvement of Workers living Condition <ul style="list-style-type: none"> - Continuous repairing job for mill quarters. - Installation of information board. 2. Mill – Processing. <ul style="list-style-type: none"> - Installation of CEMS done and on trial. - Bund heightening at waste recovery pressing pit to avoid oil spillage. - To sell empty bunch to potential buyer. To reduce EFB stock at yard to avoid over than allowable storage capacity. 	<p>Complied</p>

		<p><u>Lanadron Estate</u></p> <ol style="list-style-type: none"> 1. Introduction to Land Surf to replace manual wheelbarrow to increase FFB evaluation at newly matured area. 2. Improvement on worker’s welfare and housing improvement: <ul style="list-style-type: none"> - Roof and ceiling replacement - Provide steel cabinet for safekeeping - Appointment of Gender Representatives - Briefing on prevention of sexual harassment. <p><u>Pagoh Estate</u></p> <ol style="list-style-type: none"> 1. Improvement on Operational. <ul style="list-style-type: none"> - Purchase of machineries such as MF3, Mid Mounted Grader, ST-GEO and Selarong Eagle Spray. To reduce labour shortage and increase coverage of hectarage. 	
<p>3.2.2</p>	<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>RSPO metric template version 2.1 is used for the reporting of SOU 19 Pagoh Certification Unit’s metrics (economic, social and environment). Data reporting period is January to December 2021 for (social and environment metrics) and economic metrics from Sept 2021 – Aug 2022 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.</p>	<p>Complied</p>
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			

<p>3.3.1</p>	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance -</p>	<p>Standard Operating Procedures (SOPs) for the estate and mill has been prepared. Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units under SOU 19 as a guidance document to conduct estate operation. The estates also hold the Safety Work Procedure. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc.</p> <p>Palm Mill holds two SOPs: sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill.</p> <p>For Health, Safety and Environment, both mill and estates, Sime Darby has issued Health, Safety and Environment (HSE) Management System and Standard Operating Procedures. Sime Darby continuously updated the SOP established. Among the updated SOP FY 2022 as follows:</p> <ol style="list-style-type: none"> 1. UM HSE Management System Manual, UM/HSE/MS/01 2. First Aid in Workplace Procedure, UM/HSE/OCP/01 3. Safety Harvesting Procedure, UM/HSE/OCP/02 4. Personal Protective Equipment Procedure, UM/HSE/OCP/03 5. Chemical Safety Management Procedure, UM/HSE/OCP/04 6. Permit to Work (PTW) Procedure, UM/HSE/OCP/05 7. OSH Risk Management Procedure, UM/HSE/SE/01 	<p>Complied</p>
<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p>	<p>A mechanism on checking the consistency of estate and mill implementation of their procedures were in place. Among the mechanism such as Mill/Plantation Advisor Visit, Performance</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		Monitoring Visit, SORA/SCRA visit, Agronomist visit and Internal Audit.	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	<p>The operating units maintain all the records of monitoring and actions taken for all issues raised during the visit. Reviewed the monitoring records as follows:</p> <p><u>Lanadron Estate</u></p> <ol style="list-style-type: none"> 1. Estate Structured Crop Recovery Assessment Report dated 01/08/2022 2. Performance Monitoring Visit Summary dated 17/08/2022 3. Internal Audit Report dated 10/08/2022 <p><u>Pengkalan Bukit Estate</u></p> <ol style="list-style-type: none"> 1. Estate Structured Crop Recovery Assessment Report dated 21/02/2022 2. Internal Audit Report dated 10/08/2022 3. Agronomist Report dated 29/11/2021 <p><u>Pagoh POM</u></p> <ol style="list-style-type: none"> 1. Structured Oil Recovery Assessment (SORA) dated 25-27/07/2022 2. Internal Audit Report dated 09/08/2022 <p><u>Pagoh Estate</u></p> <ol style="list-style-type: none"> 1. Estate Structured Crop Recovery Assessment Report dated 16/02/2022 2. Performance Monitoring Visit Summary dated 17/08/2022 	Complied

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.			
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There were no new planting at Lanadron Estate, Pengkalan Bukit Estate and Pagoh Estate. Nonetheless, the assessment of environmental impact of its existing activities is documented in the following documents:</p> <ol style="list-style-type: none"> 1. Environmental Aspect and Impact Identification Form 2. Environmental Impact Evaluation Form <p>For existing operations, the operating unit of SOU 19 documented the continual improvement plan for social in the Social Management Plan. Identified main social aspects and impacts from SIA considered in the plan including the following categories:</p> <ul style="list-style-type: none"> - Workers' Housing Condition/Living Improvement - Workers' Working Condition - External stakeholder's feedbacks <p>Improvements conducted by individual operating units within SOU 19 including housing improvement programs, minimum wages achievement monitoring and community contribution programs.</p>	Complied
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Environment Aspect and Impact Identification for all activities such as construction work, compound, dispensary, field, harvesting and collection, main entrance, pest and disease control, petrol and diesel, power station, replanting, road, schedule waste store, workshop were available for verification.</p> <p>Once the Environmental Aspect and Impact is completed, the Environmental Impact Evaluation is conducted to evaluate the impact severity using a format (Environmental Impact Evaluation</p>	Complied

		<p>Form). There are 3 classifications of impact established in order to justify the action plan (mitigations) required i.e.:</p> <p>Methodology of assessment is based on interview at workstation for harvesters, sprayers, union representatives, gender committee, contractor, supplier, local community, neighbouring estate, government & School. The secondary data collection – document review/file checking also been made and available for verification.</p> <p>Environmental Management Plans are further developed, consisting of EAI & EIE, Waste Management Plan, Water Management Plan, HCV Area & Biodiversity, Energy Management & Pollution Prevention and IPM Management which were available for verification.</p> <p>Social management plan has been reviewed for all operating units on annual basis. For example, at Landron Estate, SIA management plan was reviewed on 11/10/2022. The management plan has been developed after compilation the feedbacks and issues during various of meeting such as stakeholder meeting, union meeting and gender committee meeting. Summary of issues raised will be incorporated in the SIA management plan for further monitoring.</p>	
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>There is no new planting in SOU19 (Pagoh POM Certification Unit). Sighted the Social Impact Assessment (SIA) carried out by PSQM team on 5-8/5/2015. The methodology of the assessment was through field interview with stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, officers from government authorities and internal workers. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community, education, safety and health, living condition, infrastructure and amenities and stakeholder engagement were assessed</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>accordingly. The report includes both positive and negative impact and its recommendation.</p> <p>Among the implementation of the Social Management Plans 2021 were weekly housing inspections, appropriate platforms for workers to voice out grievances and complaints such as <i>Suara Kami</i> and <i>Ulula</i>, periodic repairs and repainting of housing quarters and amenities among others. The Social Management Plan is reviewed yearly, usually at the beginning of the year with inputs obtained from the management and workers representatives.</p> <p>Environmental Management Plans were developed, consisting of EAI & EIE, Waste Management Plan, Water Management Plan, HCV Area & Biodiversity, Energy Management & Pollution Prevention and IPM Management which were available for verification. Among the implantation of the environment management plan were mainly focused on environmental conservations and reductions of pesticides and fossil fuels. Among the implementation that were verified included the implementation of IPM in the estates such as the well-established beneficial plants, segregation of waste and disposal in accordance with legal requirements, bi-annual monitoring of smoke emission at the mill, well established buffer zones and periodic water quality monitoring among others. The Environment Management Plan is reviewed yearly, usually at the beginning of the year with inputs obtained from the management and workers representatives.</p>	
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>The Human Resource Department in HQ has established Hiring of Local Workers procedure (Doc. No.: 01-12-19) dated 01/12/2019 and Workforce Management Unit Liaison & Recruitment procedure (WMU/LR-SOPP/MARCH2016, Rev. 0 dated 30/03/2016) to explain the recruitment processes for both local and foreign workers. The</p>	Complied

		recruitment of foreign workers will be carried out by the HQ through appointed agents in respective countries.	
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Application form, employment interview assessment form, medical check-up report and employment contract was sighted for new recruited employees. The latest recruitment of workers at Lanadron Estate was on 30/7/2022. A copied of identification card was kept as record. Interviewed with the clerk confirmed that if there is any job vacancy available, they will publish a job vacancy advertisement/flyer at the places nearby the villages. New batch of Indonesian workers checked at Lanadron Estate: <ol style="list-style-type: none"> 1. Workers ID: 170459, date joined: 30/07/2022, FFB Cutter 2. Workers ID: 170461, date joined: 30/07/2022, FFB Cutter 3. Workers ID: 170463, date joined: 30/07/2022, FFB Cutter Induction programme/briefing was carried out on 30/07/2022 and 01/08/2022.	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	Sime Darby has established the Upstream Malaysia Health, Safety and Environment (HSE) Policy Statement signed by the CEO, Upstream Malaysia dated 1/6/2020. In the Policy Statement stated the commitment to provide safe and healthy workplace and operating in an environmentally responsible manner at all their operation in Malaysia. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the mill and estate. Several updated procedures has been documented related Health and Safety:	Non-compliance

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

1. OSH Risk Management Procedure, UM/HSE/SP/01 dated 09/03/2021
2. Personal Protective Equipment (PPE) Procedure, UM/HSE/OCP/03 dated 09/03/2021
3. Safety and Health Committee Procedures, UM/HSE/OCP/08 dated 09/03/2021.

SOU 19 have conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The HIRARC is guided by the document Guidelines for Hazard Identification, Risk Assessment and Risk Control (HIRARC), Department of Occupational Safety and Health, 2008. The assessment covers all main operations and support operations. The latest HIRARC review was conducted as follows:

Operating Unit	Date
Pagoh POM	<ul style="list-style-type: none"> • 05/10/2022 for Oil Room for Accident occur on 15/07/2022 • 15/07/2022 for Boiler for new installation of sensor system
Lanadron Estate	<ul style="list-style-type: none"> • 22/04/2022 on Harvesting Frond Stacker for accident occur on 18/04/2022 • 08/09/2022 on General Worker for accident occur 24/08/2022
Pengkalan Bukit Estate	<ul style="list-style-type: none"> • 27/09/2022 on Patrolling for accident occur on 23/09/2022

Nevertheless, the mitigation plans and procedures on risk were not effectively demonstrated. Evidences were as below.

Pengkalan Bukit Estate

**RSPO P&C Public Summary Report
Revision 14 (Aug 2022)**

		<ol style="list-style-type: none"> 1. During site visit at Manuring Operation, Field 16F Division Pagoh, it was found 1 manurer was wearing surgical mask instead N95 mask while apply Manuring Activities type NK Compact 10.5/30. It was not in line with HIRARC dated 13/08/2021; Activity 5 - <i>Applying Fertilizer, with the hazard of dusty fertilizer and the existing risk control of sufficient clean water supply, long sleeve shirt, cotton gloves, facemask N95, apron and eye goggle.</i> 2. During site visit at field P08B main Division, harvesting area, it was seen the loose fruit attendant standing on the fully jacked scissor-lift hopper. It was not in line with "Prosedur Kerja Tatacara Kerja Pemandu Kenderaan (Traktor, Mini Traktor, JAMSA, LG) with reference PBE/OC/SOP-13, Semasa Memandu: (10) <i>Jangan Sekali-kali membenarkan sesiapa berada di atas muatan yang anda bawa samaada sewaktu anda sedang berhenti atau sedang bergerak</i>" 3. At the same field, it was noticed that 2 scissors lift mini tractor driver were wearing wellington boots instead of safety shoes. It was not in line with "Prosedur Kerja Tatacara Kerja Pemandu Kenderaan (Traktor, Mini Traktor, JAMSA, LG) with reference PBE/OC/SOP-13, <i>Di larang menggunakan selipar / capal atau kasut yang tidak menepati ciri-ciri keselamatan yang di tetapkan. Pemakaian PPE seperti kasut keselamatan, topi keselamatan, penutup telinga dan jaket pemantul cahaya adalah di wajibkan</i>". <p><u>Pagoh POM</u></p>	
--	--	--	--

		<p>1. During site visit at the steriliser station, it was found the operator was not wearing earplugs while in operation. It was not in line with Prosedur Kerja Selamat; Sterilization Mill Chargehand / Operator, Section 1 - <i>Pastikan pekerja yang bertugas di stesen ini menggunakan PPE yang sesuai seperti berikut: Topi Keselamatan, Sarung Tangan, Ear Plug and Safety Boots.</i></p> <p><u>Pagoh Estate</u></p> <p>1. During site inspection at Pagoh Estate - Workshop, found 2 bottles of used lubricant and 1 bottle of Kerosine were stored in the containers without any label. It was not in line with CHRA Recommendation on Organisation Control Section 5.2 (c) Labelling and Relabelling (USECHH 2000, Regulation 20 & 21), (3) <i>If the chemicals are transferred to a smaller container, relabelling is required with the chemical name or trade name as written on the original label.</i></p>	
<p>3.6.2</p>	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>The mill and estates have established Safety and Health plan FY 2022. The plan covers Risk Management, ESH Structure, Incident reporting, ERP, Chemical safety management, contractor safety management, vehicle and machinery management, communication, inspection, health and hygiene monitoring program and awareness and competency training. Reviewed the implementation of the management plan as follows:</p> <p><u>Lanadron Estate</u></p> <p>1. Chemical Health Risk Assessment was conducted in the estate to assess the usage of hazardous chemicals in the estate. CHRA Assessment has been conducted on 05/06/2022 by</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>Nisafety Consultancy. The CHRA Report (Report Ref.: JH/03/04/121) was available for verification.</p> <ol style="list-style-type: none"> 2. Medical Surveillance was conducted by Klinik TTMC Ayer Keroh on 02 & 03/08/2022 for 19 workers those deemed to be exposed to Manganese, Organophosphate and Warfarin Baits. 3. Noise Risk Assessment has been conducted at Lanadron Estate on 25/07/2022 by Noise Risk Assessor, Nur Izzati Assesor (JKKP Registration No.: HQ/16/PEB/00/158). The NRA Report (HQ/LPROYKPEB/20/00183) was available for verification. 4. Audiometric Test was conducted for workers exposed to excessive noise in the estate based on the NRA recommendations. The test have been conducted on 11/10/2021 by Nisafety Consultancy. A total of 15 workers were tested and the results showed that 10 workers have normal hearing, 5 workers have hearing loss, no workers fall under hearing Impairment, and no workers fall under Standard Threshold Shift (STS). Next audiometric test has been proposed to conduct on 14/10/2022 as per email to Nisafety Consultancy dated 01/10/2022. 5. Workplace inspection has been conducted on monthly basis and all the findings were discussed in the Quarterly OSH Meeting. Refer latest workplace inspection that has been conducted on 28/09/2022. <p><u>Pengkalan Bukit Estate</u></p> <ol style="list-style-type: none"> 1. Chemical Health Risk Assessment was conducted in the estate to assess the usage of hazardous chemicals in the estate. CHRA Assessment has been conducted on 04/06/2022 by Nisafety Consultancy. The CHRA Report (Report Ref.: JH/06/04/2901) was available for verification. 	
--	--	--	--

**RSPO P&C Public Summary Report
Revision 14 (Aug 2022)**

		<ol style="list-style-type: none"> 2. Medical Surveillance was conducted by KPJ Bandar Maharani on 08/07/2021 for 20 workers those deemed to be exposed to Pesticides, Organophosphate and Chemical Welding Rods. 3. Noise Risk Assessment has been conducted at Estate on 03/08/2020 by Noise Risk Assessor, Nur Izzati Assesor (JKKP Registration No.: HQ/16/PEB/00/158). The NRA Report (HQ/LPROYKPEB/20/00225) was available for verification. 4. Audiometric Test was conducted for workers exposed to excessive noise in the estate based on the NRA recommendations. The test have been conducted on 11/10/2021 by Nisafety Consultancy. A total of 37 workers were tested and the results showed that 26 workers have normal hearing, 11 workers have hearing loss, 7 workers fall under hearing Impairment, and no workers fall under Standard Threshold Shift (STS). Medical examination for 11 workers has been conducted o 22/12/2021 by ETOSH Consult and Engineering Plt. 5. Workplace inspection has been conducted on monthly basis and all the findings were discussed in the Quarterly OSH Meeting. Refer latest workplace inspection that has been conducted on 28/09/2022. <p><u>Pagoh POM</u></p> <ol style="list-style-type: none"> 1. Chemical Health Risk Assessment was conducted in the mill to assess the usage of hazardous chemicals in the mill. CHRA Main Assessment has been conducted on 30/04/2022 and Additional Assessment on 08/10/1021 by Global Safe T Sdn Bhd. The CHRA Report HQ/03/ASS/00/160-2018/057 and HQ/03/AS/00/160-2021/018 were available for verification. 	
--	--	---	--

**RSPO P&C Public Summary Report
Revision 14 (Aug 2022)**

		<ol style="list-style-type: none"> 2. Medical Surveillance was conducted by Klinik Kuan Sdn Bhd on 08-14/03/2022 for 13 workers those deemed to be exposed to Manganese and 09 & 14/03/2022 for 2 workers those deemed to be exposed to Hexane. 3. Noise Risk Assessment has been conducted at Pagoh POM on 19/05/2020 by Noise Risk Assessor, Pauzer Bin Ahmad (JKKP Registration No.: HQ/09/PEB/00/67). The NRA Report (HQ/09/PEB/00/67-2020/014) was available for verification. 4. Audiometric Test was conducted for workers exposed to excessive noise in the mill based on the NRA recommendations. The test have been conducted on 14/03/2022 by Klinik TTMC Ayer Keroh. A total of 7 workers were tested and the results showed that 2 workers have normal hearing, 5 workers have hearing loss with 2 workers fall under hearing Impairment, and no workers fall under Standard Threshold Shift (STS). Audiometric retest has been conducted on 19/08/2022. 5. Workplace inspection has been conducted on monthly basis and all the findings were discussed in the Quarterly OSH Meeting. Refer latest workplace inspection that has been conducted on 30/08/2022. <p><u>Pagoh Estate</u></p> <ol style="list-style-type: none"> 1. Chemical Health Risk Assessment was conducted in the estate to assess the usage of hazardous chemicals in the estate. CHRA Assessment has been conducted on 04/06/2022 by Nisafety Consultancy. The CHRA Report (Report Ref.: JH/07/04/3696) was available for verification. 2. Medical Surveillance was conducted by KPJ Bandar Maharani on 18 & 24/08/2021 for 51 workers those deemed to be 	
--	--	--	--

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>exposed to Pesticides, Organophosphate and Chemical Welding Rods.</p> <ol style="list-style-type: none"> 3. Noise Risk Assessment has been conducted at Estate on 14/07/2020 by Noise Risk Assessor, Nur Izzati Assesor (JKKP Registration No.: HQ/16/PEB/00/158). The NRA Report (HQ/LPROYKPEB/20/00182) was available for verification. 4. Audiometric Test was conducted for workers exposed to excessive noise in the estate based on the NRA recommendations. The test have been conducted on 23-25/05/2022 by KPJ Bandar Maharani. A total of 26 workers were tested and the results showed were available. 5. Workplace inspection has been conducted on monthly basis and all the findings were discussed in the Quarterly OSH Meeting. Refer latest workplace inspection that has been conducted on 28/09/2022. 	
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units visited has conducted training need analysis for all employee, management, and contractors. The need analysis was conducted based on the job designation and training required by the job type.</p> <p>Trainings was identified for management, employee and contractors and programmed throughout FY 2022. The training identified covers the safety and health, environmental and social aspect.</p> <p>Means implemented by SOU 19 certification units were to assess understanding of participants include:</p> <ul style="list-style-type: none"> • Participants completing post-training evaluation/feedback form and give suggestions; 	<p>Complied</p>

		<ul style="list-style-type: none"> Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended. <p>Random interviews with workers showed that they understood what RSPO is, the several subsidiaries policies, what does their work/job SOP states and the consequences if deviated, the need to put on PPE and demonstrate donning PPE and when it should be changed, the use of fire extinguishers, understanding workplace hazards, risks and needed control measures, Covid-19 Safe Practices. etc.</p>																					
3.7.2	<p>Records of training are maintained. - Minor Compliance -</p>	<p>The operating units maintained the training records conducted. Reviewed the training records as follows:</p> <p>Pagoh POM</p> <table border="1" data-bbox="1151 794 1926 1190"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>HIRARC Training</td> <td>03/01/2022</td> </tr> <tr> <td>PPE & LOTO System</td> <td>03/01/2022</td> </tr> <tr> <td>Workshop Training</td> <td>22/06/2022</td> </tr> <tr> <td>Chemical Management</td> <td>09/08/2022</td> </tr> <tr> <td>Pictorial Work Instruction</td> <td>30/11/2021</td> </tr> <tr> <td>First Aider Training</td> <td>31/03/2022</td> </tr> <tr> <td>Fire Drill Training by BOMBA</td> <td>17/08/2022</td> </tr> </tbody> </table> <p>Pagoh Estate</p> <table border="1" data-bbox="1151 1281 1926 1377"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Sickle Pro & Safety Training</td> <td>03/01/2022</td> </tr> </tbody> </table>	Training	Date	HIRARC Training	03/01/2022	PPE & LOTO System	03/01/2022	Workshop Training	22/06/2022	Chemical Management	09/08/2022	Pictorial Work Instruction	30/11/2021	First Aider Training	31/03/2022	Fire Drill Training by BOMBA	17/08/2022	Training	Date	Sickle Pro & Safety Training	03/01/2022	Complied
Training	Date																						
HIRARC Training	03/01/2022																						
PPE & LOTO System	03/01/2022																						
Workshop Training	22/06/2022																						
Chemical Management	09/08/2022																						
Pictorial Work Instruction	30/11/2021																						
First Aider Training	31/03/2022																						
Fire Drill Training by BOMBA	17/08/2022																						
Training	Date																						
Sickle Pro & Safety Training	03/01/2022																						

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		Fire Drill Training	25/01/2022	
		Briefing And Training Use PPE	18/02/2022	
		Chemical Spillage Training	23/07/2022	
		Spraying & Safety Training	13/07/2022	
		First Aid Training	23/07/2022	
		Manuring & Safety Training	07/07/2022	
		Lanadron Estate		
		Training	Date	
		Training Bagworm Census	21/03/2022	
		Fire Fighting & Fire Extinguisher Training	07/04/2022	
		Tractor Driver Training	09/05/2022	
		Accident Alert Briefing	27/05/2022	
		HIRARC Review Training	21/06/2022	
		FFB Cutter Training	05/08/2022	
		First Aid Training	08/08/2022	
		Pengkalan Bukit Estate		
		Training	Date	
		Hearing Conservation Training	26/09/2022	
		Nursery Training	10/09/2022	

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<table border="1"> <tr> <td>Tractor Implement Safety Training</td> <td>04/08/2022</td> </tr> <tr> <td>RSPO Policy Briefing</td> <td>16/05/2022</td> </tr> <tr> <td>Manuring Training</td> <td>27/04/2022</td> </tr> <tr> <td>First Aid Training</td> <td>02/08/2022</td> </tr> <tr> <td>Fire Drill Training</td> <td>02/08/2022</td> </tr> </table>	Tractor Implement Safety Training	04/08/2022	RSPO Policy Briefing	16/05/2022	Manuring Training	27/04/2022	First Aid Training	02/08/2022	Fire Drill Training	02/08/2022	
Tractor Implement Safety Training	04/08/2022												
RSPO Policy Briefing	16/05/2022												
Manuring Training	27/04/2022												
First Aid Training	02/08/2022												
Fire Drill Training	02/08/2022												
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>The mill has identified all relevant personnel involve in supply chain system such as Mill Manager, Asst. Mill Manager, QA Supervisor, and Weighbridge Operator.</p> <p>The mill conducted the training need analysis for the personnel identified in SCCS. Latest training was conducted as follows:</p> <ol style="list-style-type: none"> 1. SCCS training by RSQM to Pagoh POM management and Contractors dated 02/03/2022 2. SCCS (Mass Balance Accounting, Introduction of Palm Trace) Training dated 14/06/2022 	Complied										
<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>													
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB</p>	<p>Pagoh POM uses the Mass Balance Module as it's FFB are sourced from estates and FFB Collection Centres that are certified and uncertified against the RSPO P&C.</p>	Not Applicable										

	without physically separating them, then only Mass Balance Module is applicable.																								
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Pagoh POM receives certified FFB and uncertified FFB since June 2019. Therefore, qualifies for the Mass Balance Supply Chain System and module. During the RSPO assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products. The list of FFB Suppliers are as below;</p> <p>Certified FFB</p> <table border="1" data-bbox="1151 726 1928 1125"> <thead> <tr> <th>Estate</th> <th>SOU</th> </tr> </thead> <tbody> <tr> <td>Pagoh Estate</td> <td>SOU 19</td> </tr> <tr> <td>Lanadron Estate</td> <td>SOU 19</td> </tr> <tr> <td>Pengkalan Bukit Estate</td> <td>SOU 19</td> </tr> <tr> <td>Welch Estate</td> <td>SOU 18</td> </tr> <tr> <td>Kempas Estate</td> <td>SOU 17</td> </tr> <tr> <td>Kemuning Estate</td> <td>SOU 17</td> </tr> <tr> <td>Tangkak Estate</td> <td>SOU 17</td> </tr> </tbody> </table> <p>Uncertified FFB</p> <table border="1" data-bbox="1151 1214 1928 1356"> <thead> <tr> <th>Estate</th> <th>Category</th> </tr> </thead> <tbody> <tr> <td>BP Realty & Plantation Sdn Bhd</td> <td>Traders</td> </tr> <tr> <td>Impressive Transform Sdn Bhd</td> <td>Traders</td> </tr> </tbody> </table>	Estate	SOU	Pagoh Estate	SOU 19	Lanadron Estate	SOU 19	Pengkalan Bukit Estate	SOU 19	Welch Estate	SOU 18	Kempas Estate	SOU 17	Kemuning Estate	SOU 17	Tangkak Estate	SOU 17	Estate	Category	BP Realty & Plantation Sdn Bhd	Traders	Impressive Transform Sdn Bhd	Traders	Complied
Estate	SOU																								
Pagoh Estate	SOU 19																								
Lanadron Estate	SOU 19																								
Pengkalan Bukit Estate	SOU 19																								
Welch Estate	SOU 18																								
Kempas Estate	SOU 17																								
Kemuning Estate	SOU 17																								
Tangkak Estate	SOU 17																								
Estate	Category																								
BP Realty & Plantation Sdn Bhd	Traders																								
Impressive Transform Sdn Bhd	Traders																								

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<table border="1"> <tr> <td>Koperasi Membeli Tanah Grisek Ledang Berhad</td> <td>Traders</td> </tr> <tr> <td>Marak Teguh – PPLK Pagoh</td> <td>Traders</td> </tr> <tr> <td>Kelapa Sawit Tai Hwa Sdn Bhd</td> <td>Traders</td> </tr> <tr> <td>Tiong Oil Palm Sdn Bhd</td> <td>Traders</td> </tr> <tr> <td>Gan Estate Contractor Sdn Bhd</td> <td>Estate</td> </tr> <tr> <td>Sin Chin Joo Sdn Bhd</td> <td>Traders</td> </tr> <tr> <td>Syarikat Pembangunan Pertanian</td> <td>Estate</td> </tr> <tr> <td>Eng Huat Latex Concentrate Sdn Bhd</td> <td>Traders</td> </tr> </table>	Koperasi Membeli Tanah Grisek Ledang Berhad	Traders	Marak Teguh – PPLK Pagoh	Traders	Kelapa Sawit Tai Hwa Sdn Bhd	Traders	Tiong Oil Palm Sdn Bhd	Traders	Gan Estate Contractor Sdn Bhd	Estate	Sin Chin Joo Sdn Bhd	Traders	Syarikat Pembangunan Pertanian	Estate	Eng Huat Latex Concentrate Sdn Bhd	Traders	
Koperasi Membeli Tanah Grisek Ledang Berhad	Traders																		
Marak Teguh – PPLK Pagoh	Traders																		
Kelapa Sawit Tai Hwa Sdn Bhd	Traders																		
Tiong Oil Palm Sdn Bhd	Traders																		
Gan Estate Contractor Sdn Bhd	Estate																		
Sin Chin Joo Sdn Bhd	Traders																		
Syarikat Pembangunan Pertanian	Estate																		
Eng Huat Latex Concentrate Sdn Bhd	Traders																		
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 section 1 of this public summary 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 is carried out by the GTM Department, HQ. All transaction are 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>	Sime Darby Plantation Berhad has develop Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability. Refer Sustainable Supply Chain and Traceability Procedure For Upstream Malaysia, Document No: SD/SDP/GSD/SCCS/0522/01 dated 01/06/2022. Implementation of the procedure to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for	Complied																

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<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>traceability and mass balance. The following subjects were included in the procedure:</p> <ul style="list-style-type: none"> 4.0 Responsibilities 5.0 Control of Documents & Records 6.0 Delivery of FFB from the Estate 7.0 Receiving FFB at the Mill 9.0 Process Monitoring 10.0 Products Despatch 11.0 Non-conforming Products and/ or Documents 12.0 Product Claims 13.0 Outsourced Contractor 14.0 Training 15.0 Reclassification of Mill’s Supply Chain Model 16.0 Production Volume 17.0 Conversion Factors 18.0 Internal Audit 19.0 Complaints 20.0 Management Review 	
<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. 	<p>Addressed in Sustainable Supply Chain and Traceability Procedure For Upstream Malaysia, Document No: SD/SDP/GSD/SCCS/0522/01 dated 01/06/2022 under section 18.0 Internal Audit. Based on the procedure, the internal audit is to be conducted annually as per Internal Audit Procedure. Refer SOP ref. no. SD/GSD/SCU/IAP.</p> <p>Latest internal audit was conducted for RSPO P&C MYNI 2019 including Supply Chain Requirements for Mills as per report RSPO and MSPO Internal Audit report SOU 19 for Pagoh POM dated</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>09/08/2022. No non-conformity regarding supply chain was issued during the assessment. The results of Internal Audit were discussed in the Management Review Meeting as sighted in minutes meeting conducted on 09/09/2022 under section 6.1: Results of Internal Audit.</p>	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>The daily records are prepared at the entry point at the weighbridge. When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in order the FFB to be received by the mill. Daily summary and monthly summary documented for all the certified FFB.</p> <p>The mill received FFB from sister estate with RSPO certified and purchased from the outside FFB supplier. 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>Complied</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>Sample 1 – Sime Darby Estate</p> <ul style="list-style-type: none"> • Weighbridge ticket no.: 171899 • FFB delivery note: 27382 • Name of estates: Pagoh Estate • Transporter: Diyana Trading Services Sdn Bhd • Vehicle no.: MBX2523-P3 • Field/Year of planting: 2016B • Date: 12/10/2022 • Net weight: 12.22 MT <p>Sample 2 – OCP</p> <ul style="list-style-type: none"> • Weighbridge ticket no.: 171005 • FFB delivery note: 04504 • Name of estates: Sin Chin Joo Sdn Bhd • Transporter: Sin Chin Joo Sdn Bhd • Vehicle no.: JTS6833 • Field/Year of planting: - • Date: 30/08/2022 • Net weight: 20.29 MT 	
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>The RSPO certified product that supply to the refinery were made available in the document form. The FFB, CPO and PK weighbridge ticket were contained all the required information. Sample as follow:</p> <p>CPO – Sample 1</p> <p>a) The name and address of the buyer: Sime Darby Oils Port</p>	Complied

**RSPO P&C Public Summary Report
Revision 14 (Aug 2022)**

	<ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>Klang Refinery Sdn Bhd</p> <ul style="list-style-type: none"> b) The name and address of the seller: KKS Pagoh, Muar, Johor c) The loading or shipment/ delivery date: 06/08/2022 d) The date on which the documents were issued: 06/08/2022 e) RSPO certificate number: RSPO 600305 f) A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Palm Oil (CPO) RSPO MB. g) The quantity of the products delivered: 40.95MT h) Any related transport documentation: Lorry Registration No: JHG3861 i) A unique identification number: 014191 <p>PK – Sample 1</p> <ul style="list-style-type: none"> a) The name and address of the buyer: SDO Carey Island KCP b) The name and address of the seller: KKS Pagoh, Muar, Johor c) The loading or shipment/ delivery date: 04/08/2022 d) The date on which the documents were issued: 04/08/2022 e) RSPO certificate number: RSPO 600305 f) A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Palm Oil (CPO) RSPO MB. g) The quantity of the products delivered: 40.53MT h) Any related transport documentation: Lorry Registration No: TCK6876 	
--	---	---	--

		i) A unique identification number: 014181	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>The mill does not outsource any of its milling activities to any third party. With regards to the contracted CPO and PK transporters, it is stated in the contract agreement between Pagoh POM and the contractors in Annexure 5, RSPO Supply Chain Certification Standard, that the site has legal ownership of all input material to be included in outsourced processes.</p>	Complied
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Details of contractors are available in the list of contractors.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The list of contractors is updated from time to time by the mill. The information of any newly appointed contractor is shared with BSI	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		through pre-audit information request prior to the audit. The information is provided to the assessment team.	
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. 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. 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. 	<ul style="list-style-type: none"> i) All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible. ii) The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 in Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019. iii) NA as the mill is using MB model iv) For Mass Balance Module, Nonconformities on the implementation of Supply Chain Records and Transactions were verified as below. <ol style="list-style-type: none"> 1. Based on the verification of the mill’s Production and sales registered in RSPO PalmTrace for the period under review (Oct 2021 to Sept 2022), it was found that the mill has sold 2,184.17 mt (as of Aug 2022) of RSPO certified PK more than its stock balance. Negative stock was documented for 7 consecutive months. 2. The mass balance account was not documented accurately as it did not show the correct volume for ‘Balance’ and ‘Carry Forward’ for CPO & PK. Hence, a major Non-conformity was raised. 	Non-compliance
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</p>	Conversion factor of CPO and PK production is depending on the actual OER and KER.	Complied

	extraction rates based upon past experience, documented and applied it consistently.		
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	NA as the mill is using MB module.	Not Applicable
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	Registration of transactions i) The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. ii) RSPO certified volumes sold under different scheme or as conventional were not registered in the RSPO PalmTrace.	Complied
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not used. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by pagoh POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc). Thus, this indicator is not applicable	Not Applicable

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

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 no off-product claim made by Pagoh POM as to date.	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 no off-product claim made by Pagoh POM as to date.	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 no off-product claim made by Pagoh POM as to date.	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>	No evidence of RSPO corporate logo used by Pagoh POM as verified through documentations and websites.	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>	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
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>	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e product/commodity with SCC model (CPO/Palm Kernel RSPO MB) and RSPO certificate number.	Complied

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>	Pagoh POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	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.	Oil palm content is 100% CPO and claim as RSPO MB-certified.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Non-certified FFB comes from external crop and since Pagoh POM is using Mass Balance module, the non-certified volume is covered in the Mass Balance sheet.	Complied
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> Surrounded by the text: ‘Certified sustainable palm oil’. The RSPO label MUST contain the tag ‘MIXED’. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and 	Pagoh POM does not use the RSPO label in its product (CPO & PK). This is confirmed due site visit observation and interview with the mill workers.	Not Applicable

	<p>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.</p> <ul style="list-style-type: none"> • 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. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p>	<p>No evidence of storytelling in product related communication. Hence, this requirement is not applicable</p>	<p>Not Applicable</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>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has established Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC). The HRC was last revised on August 2020. They promote the human rights, safeguard democracy and its institutions and not violate the rights of others. They also recognize the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, they are committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as respond to complaints on any alleged threats made to them. Refer to Policy on the Protection of Human Rights Defenders (HRDs) dated 25/03/2020 for more information. Policy on the Protection of HRDs FINAL.pdf (simedarbyplantation.com).</p> <p>The policies were communicated to stakeholders during stakeholder meetings. Besides, the briefing of the policies was carried out on 13/05/2022 at Pengkalan Bukit Estate and 01/06/2022 at Pagoh POM.</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	Sime Darby Plantation prohibits any form of harassment in their operation as per the policies above. Interviewed with the workers confirmed that no harassment by the management.	Complied
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	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they believe everyone has the responsibility to promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognise the important role Human Rights Defenders, whistle blowers, complainants and community spokespersons play by lodging complaints in confidence.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in https://www.simedarbyplantation.com/corporate/whistleblowing . Besides, the company has implemented "Suara Kami" as a platform for the workers to raise any issue. The workers in Pagoh Palm Oil Mill were briefed on the complaint mechanism during morning muster. Besides, external stakeholders were briefed during the stakeholder meeting. Interviewed with the internal and external stakeholders confirmed that they have been briefed and understood on the complaint mechanism implemented by the company. The latest initiative introduced (ULULA - Impact Worker Helpline) effective from 27/08/2021.	Complied

4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>The on-site verification through consultation among internal and external stakeholders and documented records reviewed shown that SOU 19 keeps parties to a grievance informed of progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders in addressing issues raised by stakeholders. Furthermore, neither any complaints nor land dispute occurred in the SOU 19 Certification Unit at the time of audit as verified through stakeholder consultation.</p>	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to 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>Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in https://www.simedarbyplantation.com/corporate/whistleblowing. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p>	Complied
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>The mill and estates' management have made contribution to the local communities based on the requests from stakeholders. Among good deeds and contributions to the stakeholders sighted;</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<ol style="list-style-type: none"> 1. "Kami Prihatin" Campaign (food and essential items distribution under Yayasan Sime Darby) 2. Joint activities with neighbouring communities on CSR project such as road repair and maintenance as well as major cleaning @ "gotong royong" 3. Contribution/donation to SJK (C) Kim Kee Ladang Craigiela <ul style="list-style-type: none"> - Donation for children's day (23/09/2022) 4. Contribution/donation to SK Paya Panjang <ul style="list-style-type: none"> - Donation for sports day (19/09/2022) 																					
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>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Copies of land titles were available and verified. Details of the respective land titles to demonstrate the right to use the land as shown below. Quit rents were paid accordingly. There was no evidence of any part of the land overlapping with customary land owners.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th colspan="2" rowspan="2">Estates</th> <th colspan="4">Land title</th> </tr> <tr> <th>HS(D) No./PTD Ref/Lot ref.</th> <th>Land Use Type</th> <th>Size (ha)</th> <th>Expiry date</th> </tr> </thead> <tbody> <tr> <td rowspan="2" style="text-align: center;">1</td> <td rowspan="2" style="text-align: center;">Pagoh Estate</td> <td>GRN 89107/lot 28, Mukim Jorak, District Muar</td> <td style="text-align: center;">No specific term</td> <td style="text-align: center;">407.518</td> <td style="text-align: center;">Freehold</td> </tr> <tr> <td>GRN 93881/lot 2159, Mukim Jalan Bakri, District Muar</td> <td style="text-align: center;">No specific term</td> <td style="text-align: center;">1,039.2327</td> <td style="text-align: center;">Freehold</td> </tr> </tbody> </table>	Estates		Land title				HS(D) No./PTD Ref/Lot ref.	Land Use Type	Size (ha)	Expiry date	1	Pagoh Estate	GRN 89107/lot 28, Mukim Jorak, District Muar	No specific term	407.518	Freehold	GRN 93881/lot 2159, Mukim Jalan Bakri, District Muar	No specific term	1,039.2327	Freehold	Complied
Estates		Land title																					
		HS(D) No./PTD Ref/Lot ref.	Land Use Type	Size (ha)	Expiry date																		
1	Pagoh Estate	GRN 89107/lot 28, Mukim Jorak, District Muar	No specific term	407.518	Freehold																		
		GRN 93881/lot 2159, Mukim Jalan Bakri, District Muar	No specific term	1,039.2327	Freehold																		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

				Total land titles: 30 Total area: 2,331.74 ha				
		2	Lanadron Estate	HSD 3834/PTD7518 Total land titles: 13 Total area: 1,698.59 ha	Agriculture	603.0368	Lease period ended on 22/5/2100	
		3	Pengkalan Bukit Estate	GRN 93882/lot 2161	No specific term	380.2021	Freehold	
				GRN 82108/lot 3164	No specific term	201.3311	Freehold	
				HSD 91203/lot 1532 Total land titles: 58 Total area: 3,112.41 ha	No specific term	258.6042	Freehold	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.					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,	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities.					Complied	

	<p>including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.</p>	
4.4.2b	<p>Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.</p>	Complied
4.4.2c	<p>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.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>There is no land dispute recorded. Boundary stone was identified and marked in the GPS surveyed map. Trenches were available to demarcate the boundary and this has confirmed by interviewed with the neighbouring smallholder and local community.</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied

4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, 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 plantings are established on local peoples' land. This was verified through stakeholders' consultation.</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 plantings are established on local peoples' land. This was verified through stakeholders' consultation.</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 plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	Complied
4.5.7	<p>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.</p> <p>- Minor compliance -</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	Complied

4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	<p>Complied</p>
<p>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.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p>	<p>Complied</p>
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p>	<p>Complied</p>
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>There are no scheme smallholdings with the SOU 19 Pagoh Certification Unit. Hence this indicator is not applicable.</p>	<p>Not Applicable</p>

4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Hence there were no needs for negotiated agreements, compensation and payments to any affected parties. Hence, this indicator is not applicable.</p>	Not Applicable
<p>Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p>	Complied
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p>	<p>There was no community that have lost access and rights to land for plantation expansion as the operating units expands the planting area under certified area.</p>	Complied

	- Minor compliance -		
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied

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.</p> <p>Current and previous period prices are also publicly displayed at the weighbridge office for the reference of the FFB suppliers.</p> <p>MPOB Monthly Average and Mill OER & KER is used to determine the prices of FFB for payment to the FFB Suppliers. No changes from previous report.</p>	Complied
5.1.2	<p>(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p>	<p>There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019. 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 KKS Pagoh. For example, briefing session with AK Maju Empire on 21/6/2022 was verified. Letter of acknowledgement from owner/manager of AK Maju Empire was made available for verification.</p>	Complied
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>Pricing is based on the MPOB Monthly Average Price for CPO and PK and the OER and KER awarded by KKS Pagoh. This was affirmed by verifying the Self Billed Invoice to the FFB Suppliers.</p>	Complied

5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.</p>	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Pagoh Mill ensures that all Outsider FFB suppliers are provided with a fair, legal and transparent contract agreement. Sampled the contract agreement as below;</p> <ol style="list-style-type: none"> Agreement Number: P/P/1221/FFB03376L <ul style="list-style-type: none"> FFB Supplier: Pembangunan Pertanian Melaka Contract Period: 1/1/2022 – 31/12/2022 	Complied
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Pagoh Mill 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 done every 30 days. Verified the payment details as below;</p> <ol style="list-style-type: none"> Supplier: Eng Huat Latex Concentrate Sdn Bhd <ul style="list-style-type: none"> Invoice Number: P/AFVCH-018693 Clearing Date: 12/9/2022 Supplier: Kelapa Sawit Tai Hwa Sdn Bhd <ul style="list-style-type: none"> Invoice Number: P/AFVCH-201825 Clearing Date: 11/10/2022 	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	The Mill conducts regular calibration on their weighbridges used to determine the FFB tonnage for all FFB suppliers. Latest Calibration was done on 1/12/2021 by metrology Corporation Malaysia Sdn Bhd. 1. WB#1: serial no. 0054913 6DN, ref: J4-ATK 00160, 60 MT Mettler Toledo 2. WB#2: serial no. B226072086, ref: J4-ATK 00159, 60 MT Mettler Toledo	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Not Applicable
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Not Applicable
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Not Applicable

	competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -		
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter to ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at work and providing a platform for workers' voice and social dialogue. They respect the rights of workers and provide fair and favourable working conditions by Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. They will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy could be downloaded	Complied

		<p>from https://www.simedarbyplantation.com/sustainability/human-rights-charter.</p> <p>The contents of the Human Rights Charter were displayed in various locations including the main notice boards of the estates/mill and muster ground notice boards for employees and visitors to view. Interview conducted on-site with sampled internal and external stakeholders confirmed that the information provided were in appropriate languages and accessible to them. Workers especially were aware of the platforms available to them to voice out their grievances and social dialogs (such as <i>Suara Kami & Ulula</i>) that are conducted frequently by the management.</p>	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Interviewed with the workers comprises of different gender and nationalities confirmed that no discrimination has reported. The management treated all equally such as provided free accommodation and medical to all the workers, no charging of recruitment fees for the foreign workers and offered job based on capability. The worker can request for job transfer if found that they are unfit for the job assigned to them.</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>Sime Darby Plantation has developed a Career Progression for Workers Level (both local and foreign workers), Doc. No.: SDP/HRUM/2020/SOP01 where the promotion of workers is based on the work performance, suitability, and the leadership quality of the worker. The recruitment of foreign workers is through Human Resource Department in HQ based the regulation requirements.</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>Interviewed with the female employees in Pagoh Palm Oil Mill and estates confirmed that pregnancy testing is not conducted prior to work. They still will be able to offer for work if they are pregnant.</p>	Complied

<p>6.1.5</p>	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -</p>	<p>The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly. SDPB has introduced the new Terms of Reference (TOR) for Gender Representatives and Gender Committee, dated March 2021 which supersede the previous Gender Committees Gender Committee Handbook, First Edition 2014. In this new TOR, a more definitive roles, and responsibilities as well as governance structure and programmes were added in. Gender Committee were established by the mill and estates management and verified at each operating unit. Meetings conducted at respective units as below:</p> <ol style="list-style-type: none"> 1. Pagoh POM: 08/04/2022, 19/07/2022 2. Pagoh Estate: 15/04/2022, 21/07/2022 3. Lanadron Estate: 08/03/2022, 06/06/2022 <p>There was no sexual harassment case reported so far at all OU. Starting on August 2022 onwards, gender committee meeting carried out every 2 months once for SOU basis. Latest SOU19 meeting dated 19/08/2022 carried out at SOU19.</p>	<p>Complied</p>
<p>6.1.6</p>	<p>There is evidence of equal pay for the same work scope. - Minor compliance -</p>	<p>There is no discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting. Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste. They were paid according to the Minimum Wage Order 2020 without any discrimination. Interviewed with both the female and male workers confirmed that no discrimination has occurred.</p>	<p>Complied</p>

Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).		
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby has sign the Collective Agreement with National Union of Plantation Workers (NUPW). Sample of employment contracts are reviewed and the agreements are signed in both English and home country language (i.e. Hindi, Bahasa Malaysia/Indonesia). Upon the foreign workers arriving to the estate, they will be inducted for the terms and conditions of employment contract and briefed on the company’s policies. This has been confirmed during interview with the foreign workers.</p> <p>Sample of contracts checked at visited operating units as the following:</p> <p><u>Pagoh POM (6 workers sampled from total of 60 workers)</u></p> <ol style="list-style-type: none"> 1. Employee ID# 163693; date joined: 5/9/2021, boiler operator 2. Employee ID# 126325; date joined: 12/10/16, Oil recovery 3. Employee ID# 1155443; date joined: 11/10/19, sterilization 4. Employee ID# 167126; date joined:13/1/2022, clarification 5. Employee ID# 165189; date joined: 14/9/2021, effluent treatment plant 6. Employee ID# 165319; date joined: 27/9/2021, workshop and maintenance <p><u>Pagoh Estate (7 workers sampled from total of 83 workers)</u></p> <ol style="list-style-type: none"> 1. Employee ID# 117156; date joined: 21/9/2015, FFB cutter 2. Employee ID# 120172; date joined: 10/3/2016, general worker (GW) 3. Employee ID# 96257; date joined: 21/10/2013, FFB cutter
		Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>4. Employee ID# 123376; date joined:1/7/2016, FFB cutter</p> <p>5. Employee ID# 149787; date joined: 4/4/2019, FFB cutter</p> <p>6. Employee ID# 160680; date joined: 3/11/2020, general worker (GW)</p> <p>7. Employee ID# 125688; date joined: 15/09/2016, general worker (GW) – driver</p> <p><u>Lanadron Estate (8 workers sampled from total of 59 workers)</u></p> <p>1. Employee ID# 164008; date joined: 5/9/2021, general worker (GW)</p> <p>2. Employee ID# 104507; date joined: 22/11/2012, FFB cutter</p> <p>3. Employee ID# 105029; date joined: 08/09/2014, general worker (GW)</p> <p>4. Employee ID# 108547; date joined: 03/12/2014, Loose Fruit Collector (LFC)</p> <p>5. Employee ID# 113383; date joined: 11/05/2015, general worker (GW)</p> <p>6. Employee ID# 134957; date joined: 13/02/2018, FFB cutter</p> <p>7. Employee ID# 153721; date joined: 24/08/2019, price rated worker</p> <p>8. Employee ID# 154500; date joined: 13/03/2019, FFB cutter</p> <p><u>Pengkalan Bukit Estate (9 workers sampled from total of 88 workers)</u></p> <p>1. Employee ID# 102028; date joined: 5/6/2014, general worker (GW)</p> <p>2. Employee ID# 108681; date joined: 04/12/2014, general worker (GW)</p>	
--	--	---	--

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<ol style="list-style-type: none"> 3. Employee ID# 110252; date joined: 26/01/2015, FFB cutter 4. Employee ID# 118399; date joined: 16/11/2015, general worker (GW) 5. Employee ID# 128060; date joined: 16/11/2015, FFB cutter 6. Employee ID# 142424; date joined: 2/5/2018, FFB cutter 7. Employee ID#155229; date joined: 09/10/2019, FFB cutter 8. Employee ID# 153683; date joined: 22/8/2019, general worker (GW) 9. Employee ID# 131165; date joined: 27/2/2017 general worker (GW) 	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. The terms are in compliance with the Employment Act 1955, Minimum Wages Order 2020, SOCSO Act 1969, EPF Act 1991, EIS Act 2017, and the MAPA/NUPW agreement.</p> <p>Payroll documents, namely the payslip, also give accurate information on compensation for all work done. This includes those who receive daily-rated wages, piece rated wages, payment for any overtime work done, and public holiday pay. Also confirmed via sampled payslips that wages were paid in compliance with national legal requirements. Salary deductions and overtime were in accordance with the relevant laws (SOCSO, EPF, EIS) and Labour Office permits. None of the sampled workers had any family members performing work.</p>	Complied

**RSPO P&C Public Summary Report
Revision 14 (Aug 2022)**

		<p>a. Employment contracts template, "Employment Contract Extension for Foreign Worker (Peninsular – Indonesia/ Nepalese) – ECE1 were checked as per the following:</p> <p><u>Pagoh POM (6 workers sampled from total of 60 workers)</u></p> <ol style="list-style-type: none"> 1. Employee ID# 163693; date joined: 5/9/2021, boiler operator 2. Employee ID# 126325; date joined: 12/10/16, Oil recovery 3. Employee ID# 1155443; date joined: 11/10/19, sterilization 4. Employee ID# 167126; date joined:13/1/2022, clarification 5. Employee ID# 165189; date joined: 14/9/2021, effluent treatment plant 6. Employee ID# 165319; date joined: 27/9/2021, workshop and maintenance <p><u>Pagoh Estate (7 workers sampled from total of 83 workers)</u></p> <ol style="list-style-type: none"> 1. Employee ID# 117156; date joined: 21/9/2015, FFB cutter 2. Employee ID# 120172; date joined: 10/3/2016, general worker (GW) 3. Employee ID# 96257; date joined: 21/10/2013, FFB cutter 4. Employee ID# 123376; date joined:1/7/2016, FFB cutter 5. Employee ID# 149787; date joined: 4/4/2019, FFB cutter 6. Employee ID# 160680; date joined: 3/11/2020, general worker (GW) 7. Employee ID# 125688; date joined: 15/09/2016, general worker (GW) – driver <p><u>Lanadron Estate (8 workers sampled from total of 59 workers)</u></p>	
--	--	---	--

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<ol style="list-style-type: none"> 1. Employee ID# 164008; date joined: 5/9/2021, general worker (GW) 2. Employee ID# 104507; date joined: 22/11/2012, FFB cutter 3. Employee ID# 105029; date joined: 08/09/2014, general worker (GW) 4. Employee ID# 108547; date joined: 03/12/2014, Loose Fruit Collector (LFC) 5. Employee ID# 113383; date joined: 11/05/2015, general worker (GW) 6. Employee ID# 134957; date joined: 13/02/2018, FFB cutter 7. Employee ID# 153721; date joined: 24/08/2019, price rated worker 8. Employee ID# 154500; date joined: 13/03/2019, FFB cutter <p><u>Pengkalan Bukit Estate (9 workers sampled from total of 88 workers)</u></p> <ol style="list-style-type: none"> 1. Employee ID# 102028; date joined: 5/6/2014, general worker (GW) 2. Employee ID# 108681; date joined: 04/12/2014, general worker (GW) 3. Employee ID# 110252; date joined: 26/01/2015, FFB cutter 4. Employee ID# 118399; date joined: 16/11/2015, general worker (GW) 5. Employee ID# 128060; date joined: 16/11/2015, FFB cutter 6. Employee ID# 142424; date joined: 2/5/2018, FFB cutter 7. Employee ID#155229; date joined: 09/10/2019, FFB cutter 	
--	--	--	--

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>8. Employee ID# 153683; date joined: 22/8/2019, general worker (GW)</p> <p>9. Employee ID# 131165; date joined: 27/2/2017 general worker (GW)</p> <p>b. Check-roll records, Estate/mill daily attendance report, CKRRD005</p> <p>c. Employee Master List, SEMUA report.</p>	
<p>6.2.3</p>	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Based on review of punch cards, workers' employment contracts and payslips, evidence was available that Pagoh POM and its supply base were able to demonstrate compliance with Employment Contracts 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCISO, EPF, EIS) and non-statutory deductions (e.g. union/NUPW, water, electricity bills, etc) in accordance with Labour Office permits. These permits were provided by the management for auditors verification.</p> <p>Sampled during the audit were the following workers' employment contracts and payslips for the month of October 2021 (peak), January 2022 (low) and June 2022 (average/medium)</p> <p><u>Pagoh POM (6 workers sampled from total of 60 workers)</u></p> <ol style="list-style-type: none"> 1. Employee ID# 163693; date joined: 5/9/2021, boiler operator 2. Employee ID# 126325; date joined: 12/10/16, Oil recovery 3. Employee ID# 1155443; date joined: 11/10/19, sterilization 4. Employee ID# 167126; date joined:13/1/2022, clarification 5. Employee ID# 165189; date joined: 14/9/2021, effluent treatment plant 	<p>Complied</p>

**RSPO P&C Public Summary Report
Revision 14 (Aug 2022)**

		<p>6. Employee ID# 165319; date joined: 27/9/2021, workshop and maintenance</p> <p><u>Pagoh Estate (7 workers sampled from total of 83 workers)</u></p> <ol style="list-style-type: none"> 1. Employee ID# 117156; date joined: 21/9/2015, FFB cutter 2. Employee ID# 120172; date joined: 10/3/2016, general worker (GW) 3. Employee ID# 96257; date joined: 21/10/2013, FFB cutter 4. Employee ID# 123376; date joined: 1/7/2016, FFB cutter 5. Employee ID# 149787; date joined: 4/4/2019, FFB cutter 6. Employee ID# 160680; date joined: 3/11/2020, general worker (GW) 7. Employee ID# 125688; date joined: 15/09/2016, general worker (GW) – driver <p><u>Lanadron Estate (8 workers sampled from total of 59 workers)</u></p> <ol style="list-style-type: none"> 1. Employee ID# 164008; date joined: 5/9/2021, general worker (GW) 2. Employee ID# 104507; date joined: 22/11/2012, FFB cutter 3. Employee ID# 105029; date joined: 08/09/2014, general worker (GW) 4. Employee ID# 108547; date joined: 03/12/2014, Loose Fruit Collector (LFC) 5. Employee ID# 113383; date joined: 11/05/2015, general worker (GW) 6. Employee ID# 134957; date joined: 13/02/2018, FFB cutter 	
--	--	---	--

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>7. Employee ID# 153721; date joined: 24/08/2019, price rated worker</p> <p>8. Employee ID# 154500; date joined: 13/03/2019, FFB cutter</p> <p><u>Pengkalan Bukit Estate (9 workers sampled from total of 88 workers)</u></p> <p>1. Employee ID# 102028; date joined: 5/6/2014, general worker (GW)</p> <p>2. Employee ID# 108681; date joined: 04/12/2014, general worker (GW)</p> <p>3. Employee ID# 110252; date joined: 26/01/2015, FFB cutter</p> <p>4. Employee ID# 118399; date joined: 16/11/2015, general worker (GW)</p> <p>5. Employee ID# 128060; date joined: 16/11/2015, FFB cutter</p> <p>6. Employee ID# 142424; date joined: 2/5/2018, FFB cutter</p> <p>7. Employee ID#155229; date joined: 09/10/2019, FFB cutter</p> <p>8. Employee ID# 153683; date joined: 22/8/2019, general worker (GW)</p> <p>9. Employee ID# 131165; date joined: 27/2/2017 general worker (GW)</p> <p>From the above sample checked, it was evident that take home salary for worker exceeding Minimum Wages Order 2020 (RM 1,200) and 2022 (RM 1,500) for the month of October 2021, January 2021 and June 2022.</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of</p>	<p>The basic amenities and facilities at the quarters provided by the company to the workers includes electricity, water and domestic waste disposal. Electricity and water were supplied by government and deducted from salary. Seen the budget for housing repairs,</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

<p>acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>sanitation, garden upkeep and CAPEX & OPEX from all operating units.</p> <p>Seen the record for weekly line site inspection done by Medical Assistant (estate) and QA (mill) in fortnightly basis as per the new Workers Minimum Housing and Amenities Regulation 2020. Inspection records checked:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Estate/Mill</th> <th style="text-align: center;">Date of inspection</th> <th style="text-align: center;">Remarks</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Pagoh POM</td> <td style="text-align: center;">02/09/22, 15/09/2022 and 23/09/22</td> <td style="text-align: center;">Nil</td> </tr> <tr> <td style="text-align: center;">Pagoh Estate</td> <td style="text-align: center;">09/09/22, 17/09/22 and 23/09/22</td> <td style="text-align: center;">Nil</td> </tr> <tr> <td style="text-align: center;">Lanadron Estate</td> <td style="text-align: center;">20/09/22, 13/09/2022, 7/09/2022</td> <td style="text-align: center;">Nil</td> </tr> <tr> <td style="text-align: center;">Pengkalan Bukit Estate</td> <td style="text-align: center;">23/09/22, 17/09/22 and 30/09/22</td> <td style="text-align: center;">Nil</td> </tr> </tbody> </table> <p>As part of improvement process for house repair request, Workers Housing Management Procedure and 'OilPalmPal' Digital Housing Complaint System (OPP DHCS) was introduced.. Inter-office mail (Ref. No: UM/HSE/013/11/2021), dated 26th November 2021 from CEO Upstream Malaysia. General house rule is written under "<i>Peraturan Umum Kompleks Perumahan Pekerja</i>" .</p> <p>For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2 people per room. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utilizes).</p>	Estate/Mill	Date of inspection	Remarks	Pagoh POM	02/09/22, 15/09/2022 and 23/09/22	Nil	Pagoh Estate	09/09/22, 17/09/22 and 23/09/22	Nil	Lanadron Estate	20/09/22, 13/09/2022, 7/09/2022	Nil	Pengkalan Bukit Estate	23/09/22, 17/09/22 and 30/09/22	Nil	
Estate/Mill	Date of inspection	Remarks															
Pagoh POM	02/09/22, 15/09/2022 and 23/09/22	Nil															
Pagoh Estate	09/09/22, 17/09/22 and 23/09/22	Nil															
Lanadron Estate	20/09/22, 13/09/2022, 7/09/2022	Nil															
Pengkalan Bukit Estate	23/09/22, 17/09/22 and 30/09/22	Nil															

6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There were sundry shops located in the estates compound and the estates are nearby to the nearest town. The workers can easily access to adequate, sufficient and affordable foods and goods. Price of goods were displayed at the sundry shops. Workers interview confirmed that they can easily purchase foods at the nearest shop or choose to go nearest town away from the estate by using their transport until the main guard post and public transport to the nearest town.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>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</p>	<p>Sime Darby Plantation Berhad – Pagoh POM has provided the decent living wage for both local and foreign workers based on PREVAILING WAGES assessment. It includes wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc. The payslip sighted in clause 6.2.1 showed that the salary received complied with the minimum wage order 2020 and 2022 and the decent living wage set up by the group which is foreign worker is RM1,928.95/worker and local RM1,899.13/worker.</p>	Complied

	<p>with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors’ workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>All the core works are performed by permanent and full-time employees in SOU 19 Pagoh Palm Oil Mill and supply bases. No contract worker was employed. The estate has appointed contractor for FFB transporter and the workers are permanently working in the estate.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			

6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> - Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. - Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. - Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively. <p>During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join union</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>NUPW Committee was established in Pagoh Palm Oil Mill and the last meeting was conducted on 11/07/2022. Issues were raised during the meeting and recorded in the meeting minutes. Management plan was developed for the issues raised by the NUPW representatives and action has been taken accordingly. Interviewed with the NUPW representatives confirmed that the issues raised during the meeting were resolved. He informed that there is no any further pending issue reported during the time of audit. Sighted meeting minutes at other operating units as per below:</p> <ol style="list-style-type: none"> 1. Pagoh Estate – 16/10/2022 2. Lanadron Estate – 06/10/2022 3. Pengkalan Bukit Estate – 10/05/2022 	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>Interviewed with the NUPW representatives and the workers confirmed that the election of the representatives were elected freely by the workers without any interference of management.</p>	Complied
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: We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> - Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. - Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. - 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. 	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<ul style="list-style-type: none"> - Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees. - Protecting the Rights of Children: We seek to promote the wellbeing of children and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography. <p>Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired.</p> <p>For contractors, the clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC dated 21/06/2020, Human Rights Charter-protecting the rights of children.</p>	
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liason & Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There is no young worker employed in Pagoh POM certification unit.</p>	Not Applicable
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The unit of certification has communicated the Human Right Charter, Social Policy and Vendor COBC through the stakeholder meeting and muster briefing. For example, COBC briefing was given on 01/01/2022 at Lanadron Estate.</p>	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

<p>6.5.1</p>	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>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:</p> <ul style="list-style-type: none"> - Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims. - Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation. <p>For example, the policy was communicated on 10/3/2022 during muster briefing at Pagoh Estate.</p>	<p>Complied</p>
<p>6.5.2</p>	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>SDP 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>	<p>Complied</p>
<p>6.5.3</p>	<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. - Minor compliance -</p>	<p>Briefing of the new mother assessment was conducted during the Gender Committee meeting for SOU 19 and recorded in the minute of meeting at each visited OUs. At Lanadron Estate, the latest new mother needs assessment was done on 1/1/2022. Based on the assessment, the new mother has requested that the company to allow for scheduled break for breast-feeding and time-off for post-natal/monthly check-up at government clinic.</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has developed Gender Committee Handbook, First Edition 2014 for implementation framework and guidelines where grievance reporting procedure for gender was developed. The new Term of Reference for Gender Representative and Gender Committee, dated March 2021 has been introduced to improve on the implementation of gender related activities in Sime Darby Plantation.</p> <p>Any cases must be reported to Social & Environment Projects Unit of the PSQM Department. Incident report template was established. Flowchart and Procedure on Handling Social Issues, version 1, dated 01/11/2008 was implemented as well. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in http://www.simedarbyplantation.com/corporate/governance/whistleblowing. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. 	<p>The recruitment cost was declared by the labour agent from source country for the applicable fees. Sampled for PT Wira Karitas for Indonesia effective date on 21/07/2022 (RM 3,000) for documents required, medical, insurance, transportation, etc. No other hidden recruitment fees paid to agent. Passport was kept by the workers themselves not withheld by the management.</p>	Complied

	<ul style="list-style-type: none"> • 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>There is no contract substitution as the employment contract signed between Sime Darby and embassy of Indonesia and India was same with the employment contract signed between worker and estate/mill.</p> <p>Based on the workers interview, the overtime was given voluntarily if any work offered. The termination of service clearly stated that the termination of employment if:</p> <ol style="list-style-type: none"> 1. The company is not satisfied with your performance 2. You end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term. 3. You commit any misconduct, including theft, fraud, insubordination, negligence or any other form of crime. 4. You have breached any express or implied terms of your employment. 5. Fail medical examination based on FOMEMA result. 	
<p>6.6.2</p>	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SDPSB 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 for them to understand their responsibility in respect of human rights as included in the Group Sustainability Policy on 13/05/2022 at Pengkalan Bukit Estate.</p>	<p>Complied</p>

Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.																										
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The Estate Manager and Mill Manager in SOU 19 has been appointed as Person Responsible / Chairman for Safety and Health in the estate as per appointment letter signed by the Regional CEO. The Estate Manager has appointed the Medical Assistant as person responsible for Safety and health issue in the estate and Mill.</p> <p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate/Mill Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report, workplace inspection, and training.</p> <p>The OSH Committee meeting for Estate was conducted on quarterly basis. Reviewed the latest minutes meeting FY 2022 as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>OSH Meeting 2022</th> <th>Lanadron Estate</th> <th>Pengkalan Bukit Estate</th> <th>Pagoh Estate</th> </tr> </thead> <tbody> <tr> <td>1st Quarter</td> <td>29/03/2022</td> <td>02/02/2022</td> <td>02/01/2022</td> </tr> <tr> <td>2nd Quarter</td> <td>24/06/2022</td> <td>26/04/2022</td> <td>30/03/2022</td> </tr> <tr> <td>3rd Quarter</td> <td>22/09/2022</td> <td>25/07/2022</td> <td>27/06/2022</td> </tr> <tr> <td>4th Quarter</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> <td>23/09/2022</td> </tr> </tbody> </table> <p>Mill also has been conducted the OSH Quarterly Meeting. Refer Pagoh POM minutes of meeting dated below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>OSH Meeting 2022</th> <th>Pagoh POM</th> </tr> </thead> <tbody> <tr> <td>1st Quarter</td> <td>09/03/2022</td> </tr> </tbody> </table>	OSH Meeting 2022	Lanadron Estate	Pengkalan Bukit Estate	Pagoh Estate	1 st Quarter	29/03/2022	02/02/2022	02/01/2022	2 nd Quarter	24/06/2022	26/04/2022	30/03/2022	3 rd Quarter	22/09/2022	25/07/2022	27/06/2022	4 th Quarter	-	-	23/09/2022	OSH Meeting 2022	Pagoh POM	1 st Quarter	09/03/2022
OSH Meeting 2022	Lanadron Estate	Pengkalan Bukit Estate	Pagoh Estate																							
1 st Quarter	29/03/2022	02/02/2022	02/01/2022																							
2 nd Quarter	24/06/2022	26/04/2022	30/03/2022																							
3 rd Quarter	22/09/2022	25/07/2022	27/06/2022																							
4 th Quarter	-	-	23/09/2022																							
OSH Meeting 2022	Pagoh POM																									
1 st Quarter	09/03/2022																									
		Complied																								

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		2 nd Quarter	08/06/2022											
		3 rd Quarter	07/09/2022											
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>Emergency Procedures and Safe Working Procedures were available at the office, workshops and chemical stores. Emergency Plans were available for identified incidences such as Fire, Accident, Chemical Spillage and Evacuation. Emergency Response Team was formed in the estate to counter any unwanted emergencies.</p> <p>Procedures related accident and emergency procedures has been established. Refer Incident, Accidents and Non-Compliance Management Procedures, UM/HSE/SP/03 dated 01/05/2022.</p> <p>The operating units continuously provide training to the workers to ensure the awareness on the ERP. Reviewed the training records as follows:</p> <table border="1" data-bbox="1137 1149 1926 1396"> <thead> <tr> <th>Estate/ Mill</th> <th>ERP Training date</th> </tr> </thead> <tbody> <tr> <td>Lanadron Estate</td> <td>07/04/2022</td> </tr> <tr> <td>Pengkalan Bukit Estate</td> <td>02/08/2022</td> </tr> <tr> <td>Pagoh Estate</td> <td>25/01/2022</td> </tr> <tr> <td>Pagoh POM</td> <td>17/08/2022</td> </tr> </tbody> </table>		Estate/ Mill	ERP Training date	Lanadron Estate	07/04/2022	Pengkalan Bukit Estate	02/08/2022	Pagoh Estate	25/01/2022	Pagoh POM	17/08/2022	Complied
Estate/ Mill	ERP Training date													
Lanadron Estate	07/04/2022													
Pengkalan Bukit Estate	02/08/2022													
Pagoh Estate	25/01/2022													
Pagoh POM	17/08/2022													

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>The operating provided first aid kit/box and located in designated places or assigned to competent first aider. The operating units has also established an information on the location of first aid box, name and contact no. of the assigned first aider and communicated through briefing, training and displayed on notice board. First aid kit was monitored on monthly basis as follows:</p> <table border="1" data-bbox="1137 571 1921 852"> <thead> <tr> <th>Estate/ Mill</th> <th>First Aid Training date</th> <th>Latest First Aid Monitoring Record</th> </tr> </thead> <tbody> <tr> <td>Lanadron Estate</td> <td>08/08/2022</td> <td>06/10/2022</td> </tr> <tr> <td>Pengkalan Bukit Estate</td> <td>02/08/2022</td> <td>27/09/2022</td> </tr> <tr> <td>Pagoh Estate</td> <td>23/07/2022</td> <td>08/10/2022</td> </tr> <tr> <td>Pagoh POM</td> <td>31/03/2022</td> <td>03/09/2022</td> </tr> </tbody> </table> <p>The operating units maintain the records of accidents including JKPP 6,7,8 forms reported to DOSH, medical leaves certificates, accidents investigations reports and HIRARC review. The accidents occurrence were reported to the Headquarters through Rapid 4 systems and DOSH by submitting the JKPP 6 form through MyKKP system.</p> <p><u>Lanadron Estate</u></p> <p>Accident records were maintained and updated monthly at the estate. The JKPP 8 form have been submitted for the year ending 2021 on 15/01/2022 with reference number JKPP8/93287/2021. There were 5 accidents recorded with 91 TLA. The accident investigation has been conducted accordingly and the JKPP 6 forms have been submitted to DOSH and available for verification. As for</p>	Estate/ Mill	First Aid Training date	Latest First Aid Monitoring Record	Lanadron Estate	08/08/2022	06/10/2022	Pengkalan Bukit Estate	02/08/2022	27/09/2022	Pagoh Estate	23/07/2022	08/10/2022	Pagoh POM	31/03/2022	03/09/2022	
Estate/ Mill	First Aid Training date	Latest First Aid Monitoring Record																
Lanadron Estate	08/08/2022	06/10/2022																
Pengkalan Bukit Estate	02/08/2022	27/09/2022																
Pagoh Estate	23/07/2022	08/10/2022																
Pagoh POM	31/03/2022	03/09/2022																

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>2022 to date there were 3 accident cases in the estate. The JKPP 6 forms have been submitted to DOSH accordingly.</p> <p><u>Pengkalan Bukit Estate</u></p> <p>Accident records were maintained and updated monthly at the estate. The JKPP 8 form have been submitted for the year ending 2021 on 03/01/2022 with reference number JKPP8/93287/2021. There were 10 accidents recorded with 111 TLA. The accident investigation has been conducted accordingly and the JKPP 6 forms have been submitted to DOSH and available for verification. As for 2022 to date there were 5 accident cases in the estate. The JKPP 6 forms have been submitted to DOSH accordingly.</p> <p><u>Pagoh POM</u></p> <p>Accident records were maintained and updated monthly at the Mill. The JKPP 8 form have been submitted for the year ending 2021 on 17/01/2022 with reference number JKPP8/102238/2021. There were 6 accidents recorded with 28 TLA. The accident investigation has been conducted accordingly and the JKPP 6 forms have been submitted to DOSH and available for verification. As for 2022 to date there were 3 accident cases in the mill. The JKPP 6 forms have been submitted to DOSH accordingly.</p> <p><u>Pagoh Estate</u></p> <p>Accident records were maintained and updated monthly at the estate. The JKPP 8 form have been submitted for the year ending 2021 on 23/01/2022 with reference number JKPP8/105955/2021. There were 4 accidents recorded with 14 TLA. The accident investigation has been conducted accordingly and the JKPP 6 forms</p>	
--	--	--	--

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>have been submitted to DOSH and available for verification. As for 2022 to date there were 2 accident cases in the estate. The JKKP 6 forms have been submitted to DOSH accordingly.</p>	
<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. - Critical (Major) compliance -</p>	<p>The mill and estates visited provided appropriate PPE to all workers according to the job type. The PPE given as per HIRARC and Personal Protective Equipment (PPE) Procedure, UM/HSE/OCP/03 dated 09/03/2021.</p> <p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

<p>6.7.4</p>	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees by the organization. Reviewed on workers profile records found that all workers are covered by the accident insurances. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for July 2022, August 2022 and September 2022 for the mill and all sampled estate as below.</p> <table border="1" data-bbox="1137 612 1930 1294"> <thead> <tr> <th>Operating Unit</th> <th>Month</th> <th>Total Workers</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Pagoh POM</td> <td>Jul 2022</td> <td>95</td> <td>5,255.90</td> </tr> <tr> <td>Aug 2022</td> <td>97</td> <td>4,955.60</td> </tr> <tr> <td>Sept 2022</td> <td>98</td> <td>4,548.60</td> </tr> <tr> <td rowspan="3">Lanadron Estate</td> <td>Jul 2022</td> <td>123</td> <td>4,292.00</td> </tr> <tr> <td>Aug 2022</td> <td>123</td> <td>4,684.00</td> </tr> <tr> <td>Sept 2022</td> <td>119</td> <td>4,375.80</td> </tr> <tr> <td rowspan="3">Pengkalan Bukit Estate</td> <td>Jul 2022</td> <td>208</td> <td>7,854.30</td> </tr> <tr> <td>Aug 2022</td> <td>221</td> <td>6,909.60</td> </tr> <tr> <td>Sept 2022</td> <td>196</td> <td>7,275.10</td> </tr> <tr> <td rowspan="3">Pagoh Estate</td> <td>Jul 2022</td> <td>114</td> <td>4,432.00</td> </tr> <tr> <td>Aug 2022</td> <td>113</td> <td>4,422.00</td> </tr> <tr> <td>Sept 2022</td> <td>110</td> <td>4,175.90</td> </tr> </tbody> </table>	Operating Unit	Month	Total Workers	Amount	Pagoh POM	Jul 2022	95	5,255.90	Aug 2022	97	4,955.60	Sept 2022	98	4,548.60	Lanadron Estate	Jul 2022	123	4,292.00	Aug 2022	123	4,684.00	Sept 2022	119	4,375.80	Pengkalan Bukit Estate	Jul 2022	208	7,854.30	Aug 2022	221	6,909.60	Sept 2022	196	7,275.10	Pagoh Estate	Jul 2022	114	4,432.00	Aug 2022	113	4,422.00	Sept 2022	110	4,175.90	<p>Complied</p>
Operating Unit	Month	Total Workers	Amount																																												
Pagoh POM	Jul 2022	95	5,255.90																																												
	Aug 2022	97	4,955.60																																												
	Sept 2022	98	4,548.60																																												
Lanadron Estate	Jul 2022	123	4,292.00																																												
	Aug 2022	123	4,684.00																																												
	Sept 2022	119	4,375.80																																												
Pengkalan Bukit Estate	Jul 2022	208	7,854.30																																												
	Aug 2022	221	6,909.60																																												
	Sept 2022	196	7,275.10																																												
Pagoh Estate	Jul 2022	114	4,432.00																																												
	Aug 2022	113	4,422.00																																												
	Sept 2022	110	4,175.90																																												
<p>6.7.5</p>	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p>	<p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA)</p>	<p>Complied</p>																																												

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>- Minor compliance -</p>	<p>metrics was maintained. Accident records are found to be updated. JKKP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2021 and 2022 as reported to DOSH as follows:</p> <table border="1" data-bbox="1137 497 1924 829"> <thead> <tr> <th rowspan="2">Operating Unit</th> <th colspan="2">2021</th> <th colspan="2">2022</th> </tr> <tr> <th>Cases</th> <th>Days</th> <th>Cases</th> <th>Days</th> </tr> </thead> <tbody> <tr> <td>Lanadron Estate</td> <td>5</td> <td>91</td> <td>3</td> <td>96</td> </tr> <tr> <td>Pengkalan Bukit Estate</td> <td>10</td> <td>111</td> <td>5</td> <td>52</td> </tr> <tr> <td>Pagoh Estate</td> <td>4</td> <td>14</td> <td>2</td> <td>7</td> </tr> <tr> <td>Pagoh POM</td> <td>6</td> <td>28</td> <td>1</td> <td>44</td> </tr> </tbody> </table> <p>* Death case is categorized as loss of 6000 days.</p>	Operating Unit	2021		2022		Cases	Days	Cases	Days	Lanadron Estate	5	91	3	96	Pengkalan Bukit Estate	10	111	5	52	Pagoh Estate	4	14	2	7	Pagoh POM	6	28	1	44	
Operating Unit	2021			2022																												
	Cases	Days	Cases	Days																												
Lanadron Estate	5	91	3	96																												
Pengkalan Bukit Estate	10	111	5	52																												
Pagoh Estate	4	14	2	7																												
Pagoh POM	6	28	1	44																												

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.

<p>7.1.1</p>	<p>(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -</p>	<p>IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators.</p> <p>The estates visited has established IPM Plan. The plan was reviewed annually. The IPM Plan consist of:</p> <ol style="list-style-type: none"> To maintain progressive planting of <i>Tunera subulate</i>, <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i> at mature/immature area. 	<p>Complied</p>
--------------	--	--	-----------------

		<p>2. To do census on barn owl box, rat baiting census and Ganoderma census.</p> <p>3. To maintain grass cutting programme to reduce the use of herbicides.</p> <p>Sighted the sampled implementation of the plan as follows:</p> <p>a. Census done for Rat baiting, Barn owl occupancy and bag worm.</p> <p>b. Beneficial Plant propagation and planting around the estates.</p> <p>c. Grass Cutting application done along the estate harvester’s paths.</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>Species referenced in the Global Invasive Species Database and CABI.org were not to be used in managed areas under SOU 19 Certification Unit.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>No evidence and records of fire usage for pest control at all estate visited.</p> <p>Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 02/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest:</p> <p>“We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:</p> <p>ix. Zero tolerance of the use of fire within our land boundaries and conservation areas, and the establishment of effective monitoring and prevention systems, as well as protective firefighting measures in and around our operation.”</p>	Complied

Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																																											
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The written justification in Standard Operating Procedure (SOP) of all agrochemicals are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 1/7/2011. As per section 1.7.2 Table 5, the manual already classified the type of weed, herbicide to used, rate/dosage and dilution rate as a guidance based on the field conditions. Addition or reduction of rounds and dosage will be considered in consultation with the respective head of units or agronomist.</p>	Complied																																								
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate. Sighted the sampled records of pesticides usage (A.I.) per ha at estates visited FY 2022 as follows:</p> <table border="1" data-bbox="1137 930 1924 1372"> <thead> <tr> <th>Month</th> <th>Pagoh</th> <th>Lanadron</th> <th>Pengkalan Bukit</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>0.085</td> <td>0.148</td> <td>0.174</td> </tr> <tr> <td>Feb</td> <td>0.208</td> <td>0.079</td> <td>0.250</td> </tr> <tr> <td>Mar</td> <td>2.093</td> <td>0.115</td> <td>0.164</td> </tr> <tr> <td>Apr</td> <td>3.543</td> <td>0.114</td> <td>0.206</td> </tr> <tr> <td>May</td> <td>2.637</td> <td>0.054</td> <td>0.133</td> </tr> <tr> <td>Jun</td> <td>1.579</td> <td>0.040</td> <td>0.142</td> </tr> <tr> <td>Jul</td> <td>0.317</td> <td>0.230</td> <td>0.184</td> </tr> <tr> <td>Aug</td> <td>6.693</td> <td>0.122</td> <td>0.316</td> </tr> <tr> <td>Sep</td> <td>0.076</td> <td>0.279</td> <td>0.158</td> </tr> </tbody> </table>	Month	Pagoh	Lanadron	Pengkalan Bukit	Jan	0.085	0.148	0.174	Feb	0.208	0.079	0.250	Mar	2.093	0.115	0.164	Apr	3.543	0.114	0.206	May	2.637	0.054	0.133	Jun	1.579	0.040	0.142	Jul	0.317	0.230	0.184	Aug	6.693	0.122	0.316	Sep	0.076	0.279	0.158	Complied
Month	Pagoh	Lanadron	Pengkalan Bukit																																								
Jan	0.085	0.148	0.174																																								
Feb	0.208	0.079	0.250																																								
Mar	2.093	0.115	0.164																																								
Apr	3.543	0.114	0.206																																								
May	2.637	0.054	0.133																																								
Jun	1.579	0.040	0.142																																								
Jul	0.317	0.230	0.184																																								
Aug	6.693	0.122	0.316																																								
Sep	0.076	0.279	0.158																																								

7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5. The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan. Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas. Paraquat was eliminated. In replace, 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. - Minor compliance -</p>	<p>There is no prophylactic use of pesticides in all estates visited.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	<p>The Chemical Registers for the mill and sampled estates were available for verification and reviewed yearly and as and when there are introductions of new chemicals in the operations. The register showed that only class III & IV pesticides were used at the mill and estates. Paraquat and Monocrotophos was eliminated. In its place, less hazardous alternatives such as Glyphosate and Acephate was used instead.</p>	Complied

	- Minor compliance -																		
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>The pesticides operators has been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly health surveillance done by the Medical Assistant. Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators based on the PPE issuance forms. Reviewed the training records as per criteria 3.7.2. Sampled the training conducted for pesticide handlers as below: -</p> <p>Pengkalan Bukit Estate</p> <table border="1" data-bbox="1137 751 1912 916"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Chemical Handling Training</td> <td>21/02/2022</td> </tr> <tr> <td>Inter Spraying Training</td> <td>21/02/2022</td> </tr> </tbody> </table> <p>Pagoh POM</p> <table border="1" data-bbox="1137 1007 1912 1107"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Chemical Management</td> <td>09/08/2022</td> </tr> </tbody> </table> <p>Pagoh Estate</p> <table border="1" data-bbox="1137 1198 1912 1343"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Chemical Spillage Training</td> <td>23/07/2022</td> </tr> <tr> <td>Spraying & Safety Training</td> <td>13/07/2022</td> </tr> </tbody> </table>	Training	Date	Chemical Handling Training	21/02/2022	Inter Spraying Training	21/02/2022	Training	Date	Chemical Management	09/08/2022	Training	Date	Chemical Spillage Training	23/07/2022	Spraying & Safety Training	13/07/2022	Complied
Training	Date																		
Chemical Handling Training	21/02/2022																		
Inter Spraying Training	21/02/2022																		
Training	Date																		
Chemical Management	09/08/2022																		
Training	Date																		
Chemical Spillage Training	23/07/2022																		
Spraying & Safety Training	13/07/2022																		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices. - Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the storekeeper was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. 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 register, trade and generic names, and their Safety Data Sheet were available.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -</p>	<p>Pesticide containers were found to be recycled and used as premix containers. The access containers were all triple rinsed and punctured and stored at the designated store before they are disposed to the licensed recycle waste collector.</p> <p>Sighted the latest consignment note for disposal of triple rinsed and punctured chemical drums as below: -</p> <p><u>Lanadron Estate</u></p> <p>Latest Disposal of empty chemical drums as recycle waste disposed on 25/07/2022 to SS Setia Teknologi Enterprise. Cash Receipt No: 2155; 87 Units of Empty Chemical Containers, 5 Pcs of Kenlon Empty Containers & 2790 fertilizer bags.</p> <p><u>Pengkalan Bukit Estate</u></p> <p>Latest Disposal of empty chemical drums as recycle waste disposed on 06/10/2022 to SS Setia Teknologi Enterprise. Cash Receipt No: 2198; 83 pcs of Chemical Containers, 1300kg fertilizer beg and 9 pcs of Kenlon Empty Containers.</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p><u>Pagoh Estate</u></p> <p>Latest Disposal of empty chemical drums as recycle waste disposed on 03/10/2022 to SS Setia Teknologi Enterprise. Cash Receipt No: 2196; 300 pcs of Chemical Containers, 200 pcs of Ally bottle and 23 pcs of Kenlon Empty Containers.</p>	
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	No aerial spray activities conducted in SOU 19	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>The CHRA of each operating units have recommended the necessity of annual medical surveillance for pesticide applicators exposed to pesticides that are classified as organophosphates. There were no use of organophosphate chemicals in all the estates audited. This was verified via the Chemical Register, visit to the Chemical Store of each operating units as well as interview with the respective estate’s pesticide applicators. Nevertheless, the estates conduct monthly health screening at the estate clinics by their own Medical Assistant and records were available for verification. Health surveillance are also done for the workers to identify general health conditions regularly. Records were available and verified as below:</p> <ul style="list-style-type: none"> - Lanadron Estate - Medical Surveillance was conducted by Klinik TTMC Ayer Keroh on 02 & 03/08/2022 for 19 workers those deemed to be exposed to Manganese, Organophosphate and Warfarin Baits. - Pengkalan Bukit Estate - Medical Surveillance was conducted by KPJ Bandar Maharani on 08/07/2021 for 20 workers those 	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>deemed to be exposed to Pesticides, Organophosphate and Chemical Welding Rods.</p> <ul style="list-style-type: none"> - Pagoh POM - Medical Surveillance was conducted by Klinik Kuan Sdn Bhd on 08-14/03/2022 for 13 workers those deemed to be exposed to Manganese and 09 & 14/03/2022 for 2 workers those deemed to be exposed to Hexane. - Pagoh Estate - Medical Surveillance was conducted by KPJ Bandar Maharani on 18 & 24/08/2021 for 51 workers those deemed to be exposed to Pesticides, Organophosphate and Chemical Welding Rods. 					
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>Sime Darby has established Gender Policy on Motherhood Responsibilities and Reproductive Rights on prohibition of all confirmed pregnant and breast-feeding woman to work with pesticides. The policy has been communicated to the workers through induction training for new workers, morning briefing, iCARE Safety and Health Townhall meeting, and displayed at various notice board within the estate.</p> <p>The estates visited prohibited all confirmed pregnant and breast-feeding woman to work with pesticides as per internal memo signed by the Assistant Manager. The memo has been displayed on the notice board at few strategic place in the 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 19 Pagoh Mill and all the 3 estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2022 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1144 1321 1917 1366"> <thead> <tr> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Receptor	Sources			Non-compliance
Receptor	Sources						

**RSPO P&C Public Summary Report
Revision 14 (Aug 2022)**

		<table border="1"> <tr> <td data-bbox="1120 359 1288 478">Air</td> <td data-bbox="1288 359 1937 478">Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</td> </tr> <tr> <td data-bbox="1120 478 1288 598">Water</td> <td data-bbox="1288 478 1937 598">Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> <tr> <td data-bbox="1120 598 1288 678">Land</td> <td data-bbox="1288 598 1937 678">Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.</td> </tr> </table>	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down	Land	Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.						
Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG													
Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down													
Land	Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.													
		<p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2022. The waste generated from the mill/estates operations as shown below:</p>												
		<table border="1"> <thead> <tr> <th data-bbox="1120 837 1377 893">Type of waste</th> <th data-bbox="1377 837 1937 893">Details</th> </tr> </thead> <tbody> <tr> <td data-bbox="1120 893 1377 973">Scheduled waste</td> <td data-bbox="1377 893 1937 973">Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> <tr> <td data-bbox="1120 973 1377 1053">Domestic waste</td> <td data-bbox="1377 973 1937 1053">rubbish from the mill/estate complex and employees' quarters</td> </tr> <tr> <td data-bbox="1120 1053 1377 1133">Industrial waste</td> <td data-bbox="1377 1053 1937 1133">Fiber, palm kernel shell, boiler ash, scrap iron</td> </tr> <tr> <td data-bbox="1120 1133 1377 1236">Sewage</td> <td data-bbox="1377 1133 1937 1236">Sewage from housing/office complex</td> </tr> </tbody> </table>	Type of waste	Details	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	Domestic waste	rubbish from the mill/estate complex and employees' quarters	Industrial waste	Fiber, palm kernel shell, boiler ash, scrap iron	Sewage	Sewage from housing/office complex		
Type of waste	Details													
Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries													
Domestic waste	rubbish from the mill/estate complex and employees' quarters													
Industrial waste	Fiber, palm kernel shell, boiler ash, scrap iron													
Sewage	Sewage from housing/office complex													
		<p>The pollution identified from the mill/estates activities;:</p> <table border="1"> <thead> <tr> <th data-bbox="1120 1300 1444 1348">Type of waste</th> <th data-bbox="1444 1300 1937 1348">Details</th> </tr> </thead> <tbody> <tr> <td data-bbox="1120 1348 1444 1396">Black smoke</td> <td data-bbox="1444 1348 1937 1396">Emission from Boilers/vehicles/engines</td> </tr> </tbody> </table>	Type of waste	Details	Black smoke	Emission from Boilers/vehicles/engines								
Type of waste	Details													
Black smoke	Emission from Boilers/vehicles/engines													

		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center;">Odor & gases</td> <td style="width: 50%; text-align: center;">Activities from the effluent treatment</td> </tr> <tr> <td style="text-align: center;">Leakage of lubricant</td> <td style="text-align: center;">Storage & vehicle maintenance</td> </tr> </table> <p>Nevertheless, found the waste management plan to be inadequately documented and implemented. Evidences as follows.</p> <p><u>Pengkalan Bukit Estate</u></p> <ol style="list-style-type: none"> 1. Waste Management Plan stated that Household Waste (Housing Compound) disposed via arrangement of contractor to collect domestic waste from worker housing complex. During the site visit at the housing complex, it was verified that the domestic waste was also disposed to a pit opposite the housing compound. 2. Visit to the mentioned landfill at Pengkalan Bukit Estate, sighted that waste were not segregated prior to them being disposed at the pit. Items such as Containers contaminated with mineral oil, recyclable waste such as plastic containers, tires, fertilizer bags and plastic bottles were seen disposed at the pit. This was not in accordance with the Waste management Plan. <p>Due to this being a reoccurrence of non-conformity under the same indicator, a critical non-conformity was raised.</p>	Odor & gases	Activities from the effluent treatment	Leakage of lubricant	Storage & vehicle maintenance	
Odor & gases	Activities from the effluent treatment						
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>The workers have demonstrated good understanding in proper disposal of wastes as verified during the interview. The visited labour quarters were observed to be in clean condition, free from scheduled waste. General waste were segregated and separated accordingly.</p> <p>SW disposed through licensed contractors were verifiable through eSwis. The latest notification to DOE on types of scheduled waste was on 02/03/2022. Examples of Consignment notes verified:</p>	Complied				

		<p><u>Pagoh POM</u></p> <p>1. Waste materials classified as Scheduled Waste were disposed via licensed Scheduled Waste Contractor, Pentas Flora (Melaka) Sdn Bhd. Records of consignments notes were available for recent disposal as verified below.</p> <ul style="list-style-type: none"> - Waste Code: SW324 – Spent Hexane; Consignment Note: 2022101211I9VX10; Date: 12/10/2022; Quantity: 0.1270 Mt. - Waste Code: SW409 – Contaminated Chemical Drums; Consignment Note: 20221012126KUER4; Date: 12/10/2022; Quantity: 0.0720 Mt. - Waste Code: SW110 – Electrical Waste; Consignment Note: 20220822165IJPCU; Date: 22/08/2022; Quantity: 0.0040 Mt. <p><u>Pagoh Estate</u></p> <p>1. Waste materials classified as Scheduled Waste were disposed via licensed Scheduled Waste Contractor, Pentas Flora (Melaka) Sdn Bhd. Records of Consignment Notes were available for recent disposal and verified as below.</p> <ul style="list-style-type: none"> - Waste Code: SW410 – Spent Filter; Consignment Note Number: 2022101116OC4AS2; Date: 11/10/2022; Quantity: 0.590mt - Waste Code: SW404 – Clinical Waste; Consignment Note Number: 2022093014AOHUBQ; Date: 30/09/2022; Quantity: 0.0040. 	
--	--	--	--

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<ul style="list-style-type: none"> - Waste Code: SW305 – Spent Lubricant Oil; Consignment Note Number: 2022101116JNLUG5; Date: 11/10/2022; Quantity: 0.0760 Mt <ol style="list-style-type: none"> 2. Contaminated Chemical Containers are triple rinsed and punctured prior to being disposed to SS Setia Teknologi Enterprise. Records of disposal was available for verification. DO: Number 2196; Items: 20L Containers – 300 pcs, Ally Containers – 200 kgs, and 4 Litre Containers – 23 pcs. 3. Domestic Waste was disposed via licenced 3rd Party Contractor 3rd party Contractor, MTJJ Enterprise, whom collects the domestic waste twice a week and disposes them at Tapak Pelupusan Lebuhraya Segamat – Kuantan. Verified the operating license for collection service of house hold waste. <p><u>Pengkalan Bukit Estate</u></p> <ol style="list-style-type: none"> 1. Clinical Waste was disposed via licenced contractor Kualiti Alam Sdn Bhd. Consignment Note No: 2022092113DAICUH; Date: 21/09/2022; Waste Code: SW404; Quantity: 0.0017 mt. 2. Waste Materials classified as Scheduled Waste were disposed via licensed Scheduled Waste Contractor, Pentas Flora (Melaka) Sdn Bhd. Records of Consignment Notes were available for recent disposal and verified as below. <ul style="list-style-type: none"> - Waste Code: SW305 – Spent Lubricant Oil; Consignment Note: M04586; Date: 13/07/2022; Quantity: 0.140Mt. - Waste Code: SW410 – Contaminated Oil Filter and Rags; Consignment Note: M04586; Date: 13/07/2022; Quantity: 0.0350 Mt. <p><u>Lanadron Estate</u></p>	
--	--	--	--

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<ol style="list-style-type: none"> 1. Waste Materials classified as Scheduled Waste were disposed via licensed Scheduled Waste Contractor, Pentas Flora (Melaka) Sdn Bhd. Records of Consignment Notes were available for recent disposal and verified as below. <ul style="list-style-type: none"> - Waste Code: SW409 – Empty Containers; Consignment Note: 2022101110T731FX; Date: 11/10/2022; Quantity: 0.0680. - Waste Code: SW305 – Spent Lubricant Oil; Consignment Note: 2022101110VTI7GO; Date: 11/10/2022; Quantity: 0.1255. - Waste Code: SW410 – Contaminated Rags, Filters, Gloves & PPE; Consignment Note: 20221011104Z2CK3; Date: 11/10/2022; Quantity: 0.0580. 2. Domestic Waste was disposed via licenced 3rd party Contractor, MTJJ Enterprise, whom collects the domestic waste twice a week and disposes them at Tapak Pelupusan Lebuhraya Segamat – Kuantan. Verified the operating license for collection service of house hold waste – License Number: JPSPN/MA0245462-P/HW000367; License Validity Period: 03/11/2020 – 02/11/2022. Contract agreement between the estate and the contractor was available for verification. Records of payments were also verified (Tax Invoice No: MTJJ/LD/RC/09/22) 	
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>There was no land preparation in SOU 19 Mill and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <ol style="list-style-type: none"> a. EQMS SOP Section-B2 under felling/clearing & land preparation b. Carbon Policy 	Complied

		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.	
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. - Minor compliance -	ARM Section 8 covers the procedure for fertiliser application for both immature and mature. The procedure gives the guideline type of fertilisers to be used, timing to apply, dosage and placement.	Complied
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	<p>Plant Nutrition and Protection Unit (PNU) prepare the annual fertilizer recommendation base leaf analysis result. Leaf analysis show the nutrient level was used as the guidance for the recommendation.</p> <p>As per company SOP, the soil sampling analysis carried at 5 years interval.</p> <p>The leaf analysis and soil analysis report was made available for review.</p> <p><u>Pagoh Estate</u></p> <ol style="list-style-type: none"> 1. Latest Soil sampling was conducted on 30/02/2018, refer report no. S67/2018 2. Oil Palm leaf Sampling was conducted by Sime Darby Research Sdn Bhd latest on 29/06/2022. Leaf Sampling Report (Report no. P290/2022) was available for verification. <p><u>Lanadron Estate</u></p> <ol style="list-style-type: none"> 1. Latest Soil sampling was conducted on 20/02/2018, refer report no. S22/2018 	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>2. Oil Palm leaf Sampling was conducted by Sime Darby Research Sdn Bhd on 15/03/2022. Leaf Sampling Report (Report no. P173/2022) was available for verification.</p> <p>Pengakalan Bukit Estate</p> <p>1. Latest Soil sampling was conducted on 11/07/2018, refer report no. S40/2018.</p> <p>2. Oil Palm Leaf Sampling was conducted by Sime Darby Research Sdn Bhd on 08/02/2022. Leaf Sampling Report (Report no. P113/2022) was available for verification.</p>														
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>EFB application is done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from Pagoh POM. All estates are applying the EFB mulching in the fields as verified during the site visits. The best practice of EFB application is described in the ARM. Records were available for verification. Based on the records, it was noted that the EFB application rate per hectare was around 40 mt/Ha.</p>	Complied													
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>The estates maintain records of manuring application as per recommendation by the agronomist.</p> <p>Observed application records as per agronomist recommendation:</p> <p><u>Lanadron Estate</u></p> <table border="1" data-bbox="1137 1129 1921 1359"> <thead> <tr> <th>Fertiliser</th> <th>Month</th> <th>Fertilizer Application</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Compound NPK 65</td> <td>Apr 2022</td> <td>3500 mt.</td> </tr> <tr> <td>May 2022</td> <td>825,800 mt.</td> </tr> <tr> <td rowspan="2">Ground Magnesium Limestone</td> <td>June 2022</td> <td>5000 mt.</td> </tr> <tr> <td>Jul 2022</td> <td>35000 mt.</td> </tr> </tbody> </table>	Fertiliser	Month	Fertilizer Application	Compound NPK 65	Apr 2022	3500 mt.	May 2022	825,800 mt.	Ground Magnesium Limestone	June 2022	5000 mt.	Jul 2022	35000 mt.	Complied
Fertiliser	Month	Fertilizer Application														
Compound NPK 65	Apr 2022	3500 mt.														
	May 2022	825,800 mt.														
Ground Magnesium Limestone	June 2022	5000 mt.														
	Jul 2022	35000 mt.														

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		Kieserite	9550 mt	9550 mt
		Rock Phosphate	Jan 2022 Feb 2022 Mar 2022 Jun 2022 Jul 2022	106150 mt. 168900 mt. 144650 mt. 5000 mt. 6200mt.
		Borate	May 2022 Jun 2022	6825 mt 6125 mt
		<p><u>Pengkalan Bukit Estate</u></p> <ol style="list-style-type: none"> 1. Fertilizer: NKC1; Month; Sept – Nov 2021; Total Ha: 2193.76 Ha; Total Fertilizer: 1125.55 Mt; Status: Completed. 2. Fertilizer: CIRP; Month; Feb 2022; Total Ha: 253.65 Ha; Total Fertilizer: 66.00 Mt; Status: In Progress. 3. Fertilizer: NKC1; Month; Mar – Apr 2022; Total Ha: 154.61 Ha; Total Fertilizer: 62.15 Mt; Status: In Progress. <p><u>Pagoh Estate</u></p> <ol style="list-style-type: none"> 1. Fertilizer: NKC1; Field: 2016A; Month; Aug 22 – Sept 2022; Total Ha: 55.31 Ha; Total Fertilizer: 27.15 Mt; Status: Completed. 2. Fertilizer: NKC1; Field 2016B; Month; Aug 22 – Sept 2022; Total Ha: 53.30 Ha; Total Fertilizer: 37.18 Mt; Status: Completed 		
<p>Criterion 7.5: Practices minimise and control erosion and degradation of soils.</p>				

7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Maps of any soil categories available at all visited operating units. Soil map prepared by R&D-RSGA Precision Agriculture Unit (SHMNA).</p> <ol style="list-style-type: none"> <u>Lanadron Estate</u> The soil map prepared by R&D-RSGA Precision Agriculture Unit dated 02 June 2021. Majority soil series identified in the estate were Bria Series 40.76%, Selangor Series 06.94%, Jawa Series 32.18% and Sogomana Series 20.12%. No fragile soils identified in the estate. <u>Pengkalan Bukit Estate</u> Soil map was available for the estate. Soil series consist of Renggam Series, Malacca Series, Prang Series, Local Alluvium Series, Holyrod Series and Munchong Series. No fragile soil identified in the estate. <u>Pagoh Estate</u> The soil map prepared by R&D-RSGA Precision Agriculture Unit (SHMNA) in 04/11/2015. Majority soil series identified in the estate are Lanchang 36.04%, Local Alluvium II - 11.79% and Rengam 34.27%. 	Complied
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>There was no replanting on steep slopes at the sampled estates. Generally, the areas with slopes above 25 degrees were left unplanted and regeneration of plants growth was observed.</p>	Complied
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>No new planting at all the sampled estates.</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	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Soil surveys are made and available in a soil map at the estates. Topographic contour map are also available which are both used to manage operation in the estates.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Soil surveys are made and available in a soil map at the estates. Based on the soil survey there were no soils classified as fragile or marginal soils in the estate.	Not Applicable
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 made and available in a soil map at the estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates.	Complied
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 -	Not applicable as no peat soil in this certification unit.	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 -	Not applicable as no peat soil in this certification unit.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Not applicable as no peat soil in this certification unit.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place.	Not applicable as no peat soil in this certification unit.	Not Applicable

	- Critical (Major) compliance -		
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no peat soil in this certification unit.	Not Applicable
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no peat soil in this certification unit.	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no peat soil in this certification unit.	Not Applicable
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			

<p>7.8.1</p>	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>Water management plan at all the sampled estates were in place and implemented as verified through records of Water Management Action Plan FY 2022.</p> <p>Workers have adequate access to clean water which were supplied through their own water treatment plant and public domain (Syarikat Air Johor). The potable water supplied to the workers through water treatment plants was tested for NSDWQ compliance on monthly basis. Among the parameters tested were pH, TDS, Turbidity, Chloride, Al, E. Coli and Total Coliform. Based on the test report by an accredited lab (SAMM No. 030), generally the certification unit complied to the regulated limit.</p> <ol style="list-style-type: none"> 1. Pengkalan Bukit Estate - Water Analysis Test Report was conducted for domestic water which was treated at the Water Treatment Plant at the estate. Test Report Results (Report Number: IE1154/2022) was available indicating all parameters were within the specifications. 2. As for Pagoh POM, Pagoh Estate and Lanadron Estate, the water used for consumption is by government water , Syarikat Bekalan Air Johor which provides clean treated water. 	<p>Complied</p>
<p>7.8.2</p>	<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>Water courses and wetlands are protected as per documented Guidelines on River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). From the site observation the buffer zone was followed as per guidelines. Based on verification at all the sampled estates, the riparian zones were satisfactorily maintained, and no evidence of agrochemicals application seen. Monitoring based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/rivers, version 1, year 2008, issue no. 1, dated 1/11/2008.</p>	<p>Complied</p>

		<p><u>Pagoh POM</u></p> <p>The mill discharges the treated effluent to the nearby stream (Parit Jono Muar). Water Analysis test is done to monitor the water quality at the stream to ensure the parameters are within the specification limits. Sampling points have been established at Stream Upstream, Stream Downstream, 300m from Final Discharge – Upstream and 300m from Final Discharge – Downstream. Water Analysis Test Report were available for verification. Sampled the report dated 05/09/2022 (Test Report Number: IE1153/2022), 02/08/2022 (Test Report Number: IE982/2022) and 04/07/2022 (Test Report Number: IE906/2022). All results were within the allowable specifications.</p> <p><u>Pagoh Estate</u></p> <p>There are 3 water catchments within the estate premises. A wide buffer zone has been established along the banks of the water catchment. Signboards have be erected indicating the prohibitions of activities such as chemical spraying, fertilizer applications, fishing and swimming. No evidence of operational works such as spraying or fertilizer application was noticed.</p> <p><u>Pengakaln Bukit Estate</u></p> <p>Water Analysis Test was conducted for 2 streams that flow through the estate. Sampling points have been identified for the upstream, midstream and downstream locations. Water Sampling has been conducted every 3 months as per Water Management Plan. Water Analysis Test Reports were available for report IE93/2022 (Sampling Date: 20/01/2022), IE672/2022 (Sampling Date: 12/04/2022), and IE1053/2022 (Sampling Date: 21/07/2022). Results indicated that parameters such as pH, COD and DO did not conform with Class</p>	
--	--	---	--

		IIA/IIB of NWQS for Natural Waterways. Nevertheless, investigation have been done on the issue and corrective and preventive actions have been carried out accordingly.																																				
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>Mill effluent is treated in compliance with the Department of Environment (DOE); Syarat Syarat Lesen – Premis Kilang Minyak Kelapa Sawit Mentah.</p> <p>The mill monitors the effluent on a monthly basis and reports to DOE on a quarterly basis via the Online Environment Reporting (OER) System were available for verification.</p> <p>Effluent Analysis Report results were available for verification as below:</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>STD</th> <th>21/07/22</th> <th>02/08/22</th> <th>05/09/22</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>5-9</td> <td>8.0</td> <td>9.00</td> <td>9.26</td> </tr> <tr> <td>BOD mg/l</td> <td>100</td> <td>13</td> <td>14</td> <td>7</td> </tr> <tr> <td>SS</td> <td>400</td> <td>40</td> <td>60</td> <td>35</td> </tr> <tr> <td>Total N</td> <td>200</td> <td>51</td> <td>51</td> <td>27</td> </tr> <tr> <td>AN</td> <td>150</td> <td><1</td> <td><1</td> <td><1</td> </tr> <tr> <td>O & G</td> <td>50</td> <td>2</td> <td>6</td> <td>4</td> </tr> </tbody> </table> <p>All parameters tested complied with regulatory standards except for marginal pH level. An ETP Advisory Report has been produced stating that the pH does not cause negative impact to the aquatic life as it is nature process. However action plans for reducing the pH to the targeted range has been established and implemented.</p>	Parameter	STD	21/07/22	02/08/22	05/09/22	pH	5-9	8.0	9.00	9.26	BOD mg/l	100	13	14	7	SS	400	40	60	35	Total N	200	51	51	27	AN	150	<1	<1	<1	O & G	50	2	6	4	Complied
Parameter	STD	21/07/22	02/08/22	05/09/22																																		
pH	5-9	8.0	9.00	9.26																																		
BOD mg/l	100	13	14	7																																		
SS	400	40	60	35																																		
Total N	200	51	51	27																																		
AN	150	<1	<1	<1																																		
O & G	50	2	6	4																																		
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill continues to monitor its water use per tonne FFB processed which data obtained from flowmeters i.e. at mill process, boiler</p>	Complied																																			

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>operation and fire hydrant. Based on the records, the mill has consumed:</p> <table border="1" data-bbox="1137 435 1926 933"> <thead> <tr> <th data-bbox="1149 435 1332 486"></th> <th data-bbox="1332 435 1619 486">Month</th> <th data-bbox="1619 435 1915 486">Water (L)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1149 486 1332 534" rowspan="10" style="text-align: center;">Pagoh Palm Oil Mill</td> <td data-bbox="1332 486 1619 534">Jan 2022</td> <td data-bbox="1619 486 1915 534">10,160</td> </tr> <tr> <td data-bbox="1332 534 1619 582">Feb 2022</td> <td data-bbox="1619 534 1915 582">9,311</td> </tr> <tr> <td data-bbox="1332 582 1619 630">Mar 2022</td> <td data-bbox="1619 582 1915 630">14,402</td> </tr> <tr> <td data-bbox="1332 630 1619 678">Apr 2022</td> <td data-bbox="1619 630 1915 678">16,291</td> </tr> <tr> <td data-bbox="1332 678 1619 726">May 2022</td> <td data-bbox="1619 678 1915 726">13,206</td> </tr> <tr> <td data-bbox="1332 726 1619 774">Jun 2022</td> <td data-bbox="1619 726 1915 774">20,841</td> </tr> <tr> <td data-bbox="1332 774 1619 821">Jul 2022</td> <td data-bbox="1619 774 1915 821">16,440</td> </tr> <tr> <td data-bbox="1332 821 1619 869">Aug 2022</td> <td data-bbox="1619 821 1915 869">10,070</td> </tr> <tr> <td data-bbox="1332 869 1619 917">Sep 2022</td> <td data-bbox="1619 869 1915 917">11,674</td> </tr> </tbody> </table>		Month	Water (L)	Pagoh Palm Oil Mill	Jan 2022	10,160	Feb 2022	9,311	Mar 2022	14,402	Apr 2022	16,291	May 2022	13,206	Jun 2022	20,841	Jul 2022	16,440	Aug 2022	10,070	Sep 2022	11,674	
	Month	Water (L)																							
Pagoh Palm Oil Mill	Jan 2022	10,160																							
	Feb 2022	9,311																							
	Mar 2022	14,402																							
	Apr 2022	16,291																							
	May 2022	13,206																							
	Jun 2022	20,841																							
	Jul 2022	16,440																							
	Aug 2022	10,070																							
	Sep 2022	11,674																							
	<p>Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised</p>																								
<p>7.9.1</p>	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -</p>	<p>At the estates, the plan to optimise the usage of diesel is documented in the Energy Management Plan 2022. Among the action plans implemented are by doing regular maintenance of diesel-powered machinery and educational programme for the operators on fuel saving. The fossil fuel consumption are recorded as part of monitoring.</p> <p>At the mill, the utilisation of fibre and shell as biofuel for boiler operation is consistently implemented to generate electricity through turbines. This helps to reduce the dependency to fossil fuel.</p> <p>The use of Diesel, Electricity and Water were monitored on a monthly basis in the mill and estates and records were as follows.</p>	<p>Complied</p>																						

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Pagoh POM			
Month	Diesel (L)	Electricity (kWh)	
Jan 2022	860	117,302	
Feb 2022	865	109,239	
Mar 2022	1,264	91,712	
Apr 2022	1,140	113,573	
May 2022	1,025	77,671	
Jun 2022	651	68,065	
Jul 2022	1,379	75,547	
Aug 2022	1,330	115,853	
Sep 2022	2,175	122,836	
Pagoh Estate			
Month	Diesel (L)	Electricity (kWh)	Water (m ³)
Jan 2022	3573	40480	13337
Feb 2022	3782	42170	13657
Mar 2022	4232	37800	14674
Apr 2022	3974	45560	14674
May 2022	3117	43090	14785

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		Jun 2022	4247	43670	13063
		Jul 2022	4282	42990	14668
		Aug 2022	4451	43980	15008
		Sep 2022	3591	45330	14413
		Pengakalan Bukit Estate			
		Month	Diesel (L)	Electricity (kWh)	Water (m ³)
		Jan 2022	3061	40582	4,844
		Feb 2022	3173	44027	5,725
		Mar 2022	4106	41617	3612
		Apr 2022	4502	38729	4162
		May 2022	4141	38359	9057
		Jun 2022	3910	35401	6447
		Jul 2022	3697	40998	6543
		Aug 2022	3782	39657	5844
		Sep 2022	1682	3441	6565
		Lanadron Estate			
		Month	Diesel (L)	Electricity (kWh)	Water (m ³)

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		Jan 2022	2989	22503	11756	
		Feb 2022	2367	27211	9602	
		Mar 2022	2637	26033	10233	
		Apr 2022	2916	23480	8844	
		May 2022	2950	21692	7747	
		Jun 2022	3472	24852	10716	
		Jul 2022	3478	23826	10613	
		Aug 2022	3312	23310	8617	
		Sep 2022	2908	22406	8739	
Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.						
7.10.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -	Main sources of GHG emission identified were methane (CH) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities. The emission value is recorded and calculated through the utilisation of RSPO’s Palm GHG Calculator ver. 4.				Complied
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -	Not applicable since no new development by the certification unit.				Not Applicable

<p>7.10.3</p>	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -</p>	<p>SOU 19 Mill and Estates have implemented Energy Management Plan and Pollution Prevention Plan as below.</p> <p><u>Energy Management</u></p> <ol style="list-style-type: none"> 1. To increase efficiency in the consumption of non-renewable and renewable energy <ul style="list-style-type: none"> - To do preventive maintenance program for vehicles and machineries. - To educate workers on fuel savings <p><u>Pollution Prevention</u></p> <ol style="list-style-type: none"> 1. Management Of Scheduled Waste <ul style="list-style-type: none"> - To ensure all scheduled waste are stored and disposed as per legal requirement. - To provide regular inspection of mill vehicles for operation purposes - To maintain oil trap as to prevent oil spillage and to provide proper spill kit. 2. Black Smoke Emission <ul style="list-style-type: none"> - To conduct regular inspection and maintenance to ensure within limit emission. 3. Water pollution <ul style="list-style-type: none"> - All liquid wastes are treated in POME before being discharged to stream. Parameter of BOD < 20mg/m³. 4. To ensure no open burning a the workers housing complex. <ul style="list-style-type: none"> - To erect "Dilarang Membuat Pembakaran Terbuka" at workers housing complex. - Weekly housing inspection. 	<p>Complied</p>
---------------	--	---	-----------------

**RSPO P&C Public Summary Report
Revision 14 (Aug 2022)**

Implementation of the Pollution Prevention Plans were monitored by the management on a regular basis. Sighted the Implementation as follows.

1. Ambient Air Monitoring was monitored twice annually as per DOE Compliance Schedule Requirements. Ambient Air Monitoring Report was available for verification as below.

	1 st Half	2 nd Half
Monitoring Date	16 – 17/03/2022	25 – 26/07/2022
Assessor	Procoma Environmental (M) Sdn Bhd	
Monitoring Results (Boiler)	10.57 µg/m ³	9.27 µg/m ³
Standard Limit	100 µg/m ³	100 µg/m ³

Based on the ambient monitoring results, it shows that the concentration of Particulate matter (PM 10) monitored does not exceed the standard limit of 100 µg/m³ as stipulated under the Malaysia Air Quality Guidelines.

2. Isokinetic Stack Emission Monitoring was conduct for the Boiler by Procoma Environmental (M) Sdn Bhd on 25/07/2022. Emission test results as below.

Test Parameter	Monitoring Result	DOE Standards Limit (mg/m ³)
Particulate Matter (Dust Particulate)	21.40 mg/m ³	150 mg/m ³
Carbon Monoxide	0.001%, 12.5 mg/m ³	1000 mg/m ³

		Based on the monitoring results, it shows that the concentration of dust particulate and carbon monoxide emitted through Boiler No. 1 does not exceed the standard limit as specified under the Malaysia Air Quality Guidelines, 2014.	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	There was no land preparation of existence or new planting in SOU 19 and Estates by burning ever since SDB practiced zero burning as per the policy in: a. EQMS-SOP-Section B2 - Under felling/clearing & land preparation b. Carbon Policy As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, 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.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Hotspot monitoring managed by HQ (Fire Hotspot Monitoring Team) – if any fire detected, inform estate. Sime Darby Daily Hotspot Monitoring system has been in place since November 2013 using NASA satellite data [ref.: http://www.simedarbyplantation.com/sustainability/hotspot-dashboard/]. The system monitors any possible occurrence of fire within or nearby the concession areas throughout Sime Darby Plantation Upstream operation globally. At the estates level, there are fire prevention team established. Among the mechanisms to prevent fire are training on firefighting for the ERT, preparing the fire-fighting facilities such as tractor mounted with water bowser and submersible water pump.	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		Apart from that, Fire Prevention and Control Measures by GSQM was also established to provide guidance.									
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Engagement with adjacent stakeholders were done during the stakeholder consultation by bulletin distribution which consist of fire prevention and control measure matters. The stakeholder consultation was conducted on 17/08/2022 for Pagoh Estate, 06/10/2022 for Lanadron Estate and 02/08/2022 for Pengkalan Bukit Estate. Records of the consultation was available for verification.	Complied								
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.											
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -	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. There was no land clearing activities made nor had damaged any forest to protect or enhance the HCV. Therefore, this indicator was not applicable.	Not Applicable								
7.12.2	(C) HCVs, HCS forests and other conservation areas are identified as follows: 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. 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.	SOU 19 has conducted HCV re-assessment and documented in HCV Re- Assessment for Strategic Operating Unit (SOU) 19 Pagoh on 24 - 27 November 2015 by Plantation Sustainability Quality Management (PSQM) Department, Sime Darby Plantation Final Report (Version 2.0) dated August 2016. HCV area identified for SOU 19 Pagoh as follows: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Estate</th> <th>Assessment Area</th> <th>HA</th> <th>Present HCV</th> </tr> </thead> <tbody> <tr> <td>Lanadron Estate</td> <td>River Reserve (Muar River)</td> <td>19.41 Ha</td> <td>HCV 4</td> </tr> </tbody> </table>	Estate	Assessment Area	HA	Present HCV	Lanadron Estate	River Reserve (Muar River)	19.41 Ha	HCV 4	Complied
Estate	Assessment Area	HA	Present HCV								
Lanadron Estate	River Reserve (Muar River)	19.41 Ha	HCV 4								

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance -</p>	<table border="1"> <tr> <td rowspan="3">Pagoh Estate</td> <td>Water Catchment</td> <td>5.10 Ha</td> <td rowspan="3">HCV 4</td> </tr> <tr> <td>Water Catchment</td> <td>2.80 Ha</td> </tr> <tr> <td>Water Catchment</td> <td>1.20 Ha</td> </tr> </table>	Pagoh Estate	Water Catchment	5.10 Ha	HCV 4	Water Catchment	2.80 Ha	Water Catchment	1.20 Ha		
Pagoh Estate	Water Catchment	5.10 Ha		HCV 4								
	Water Catchment	2.80 Ha										
	Water Catchment	1.20 Ha										
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	NA		Not Applicable								
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -</p>	<p>No RTE identified as per in HCV Re-Assessment for Strategic Operating Unit (SOU) 19 Pagoh on 24 -27 November 2015 by Plantation Sustainability Quality Management (PSQM) Department, Sime Darby Plantation Sdn. Bhd. Final Report (Version 2.0) dated August 2016.</p> <p>The sampled estates have established and documented HCV area/Biodiversity management Plan. Generally among the plans established were:</p> <ol style="list-style-type: none"> a. maintaining signages b. continue to record HCV monitoring such as wildlife sighting, encroachment and illegal hunting c. enhancing HCV awareness among employees. <p>The estates continue to train the workers on HCV and RTE Species. Signage on prohibition of illegal hunting or fishing, no swimming and chemical application at buffer zone area were erected at the HCV area. Noted during site visit, all the signage was well maintained.</p>		Complied								

7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>Not applicable since there is no land clearing after November 2005.</p>	<p>Not Applicable</p>
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The estates continue to train the workers on HCV and RTE Species. Signage on prohibition of illegal hunting or fishing, no swimming and chemical application at buffer zone area were erected at the HCV area, housing area and notice board to educate the workers. The monitoring conducted by monthly basis and the record was available in each sampling estate.</p>	<p>Complied</p>
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>Educational activities on RTE species were done through a few means such as briefings/training and no hunting signage. Interview with workers showed that they have a good understanding in the restriction of capturing the RTE species. There also record of HCV monitoring sampling in Lanadron Estate. RTE Awareness was conducted in the estates. Verified the latest RTE Species Awareness Training conducted on 13/07/2022.</p>	<p>Complied</p>
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>No land clearing since without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Pagoh certification unit. Thus, this indicator is not applicable.</p>	<p>Not Applicable</p>

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2021** for **SOU 19 Pagoh POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2021** for **SOU 19 Pagoh POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.47
PKO	0.47

Extraction	%
OER	20.29
KER	5.19

Production	t/yr
FFB Process	127,440.45
CPO Produced	25,858.25
PKO Produced	6,615.04

Land Use	Ha
OP Planted Area	10,951.87
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	10,951.87

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	58,446.78	0.61	294.59	0.65	0.00	0.00	58,741.38	-
CO ₂ Emission from fertilizer	5,307.73	0.06	35.60	0.08	0.00	0.00	5,343.33	-
NO ₂ Emission	3,002.65	0.03	20.34	0.04	0.00	0.00	3,022.98	-
Fuel Consumption	308.45	0.00	0.87	0.00	0.00	0.00	309.32	-
Peat Oxidation	- 0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
Sink								
Crop Sequestration	-55,392.05	-0.58	-279.24	-0.61	0.00	0.00	-55,671.29	-
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
Total	11,673.56	0.12	72.16	0.16	0.00	0.00	15,236.63	-

*Note: Includes both estates and smallholders

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0.00	0.00
Fuel Consumption	2.37	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	2.37	0.00

Summary of Kernel Crusher Emission and Credit (if applicable)

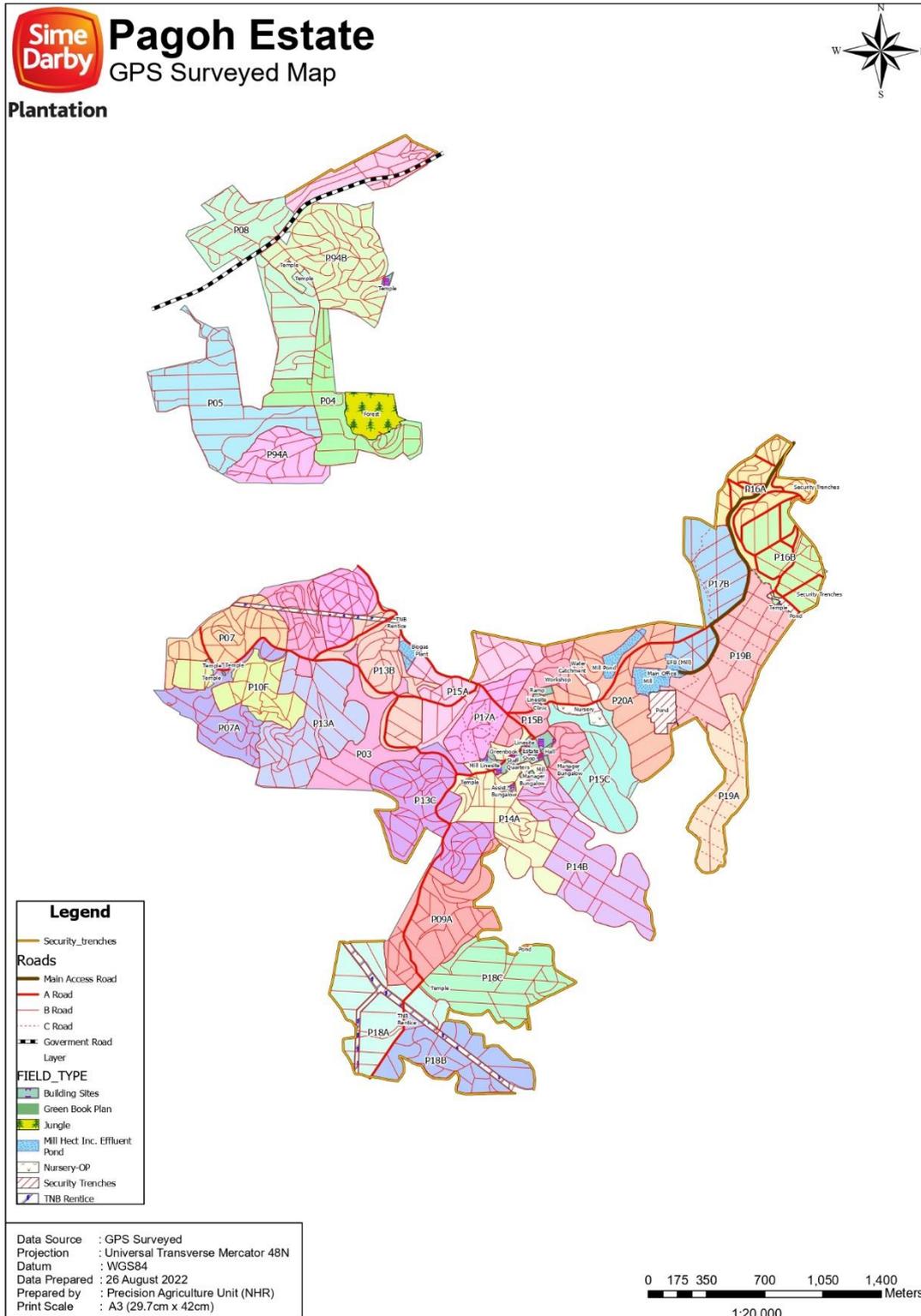
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

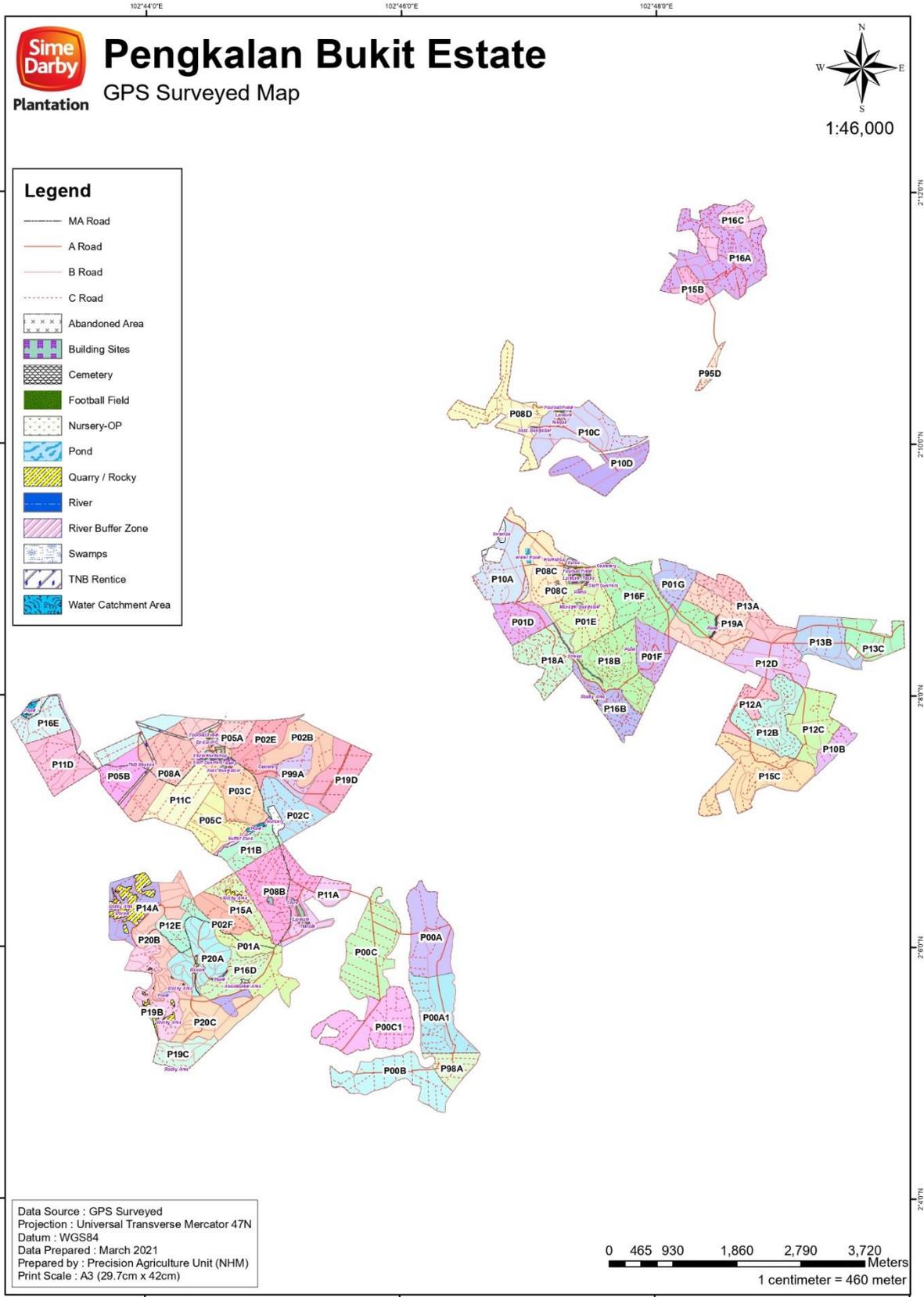
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

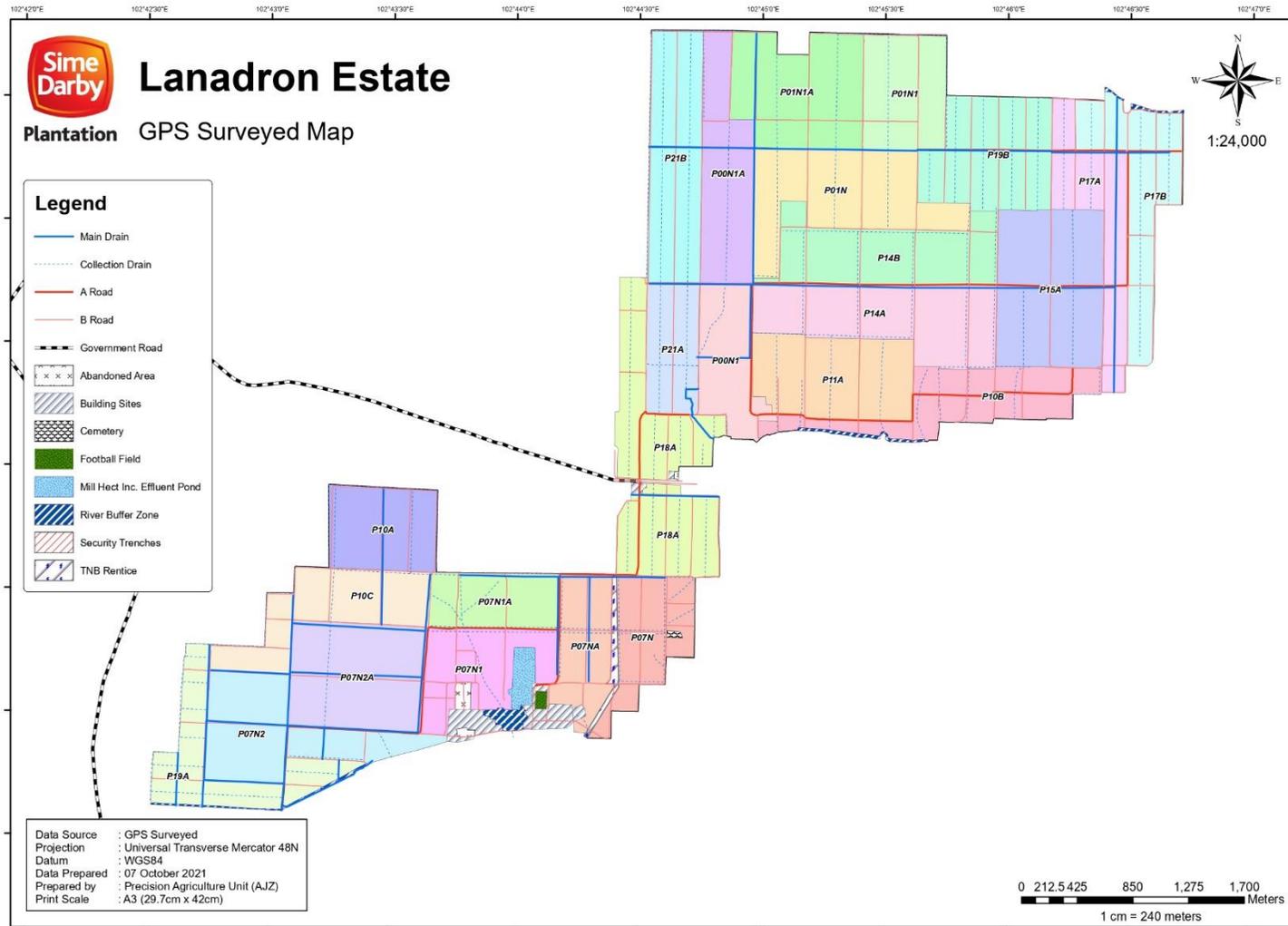
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix D: Estate Field Map



COPYRIGHT © 2022, SIME DARBY PLANTATION RESEARCH SDN BHD. ALL RIGHTS RESERVED.





Appendix E: List of Smallholder Registered and/or sampled

Not Applicable

Appendix F: List of Abbreviations

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