

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

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

|   |
|---|
| <p><b>Client Company Name / Parent Company:</b><br/> <b>TDM Plantation Sdn Bhd</b></p>  |
| <p>Client Company / Parent Company Address:<br/> Aras 1-5 , Bangunan UMNO Terengganu, Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu, Malaysia.</p>   |
| <p>Certification Unit:<br/> <b>Kemaman Palm Oil Mill</b><br/> Location of Certification Unit:<br/> Kemaman Palm Oil Mill, KM 121, Jerangau – Jabor Highway, Kemaman, 24101 Terengganu, Malaysia</p> |
| <p>Date of Final Report:<br/> 06/01/2023</p>  |

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## Section 1: Scope of the Assessment

| 1. Company Details   |   |                                 |  |
|--|---|---------------------------------|--|
| <b>Parent Company</b>  | TDM Plantation Sdn Bhd  |                                 |  |
| <b>RSPO Membership Number</b>                                      | 1-0095-11-000-00  | <b>Membership Approval Date</b> | 28/11/2011   |
| <b>Address</b>   | Aras 1-5 , Bangunan UMNO Terengganu . Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu, Malaysia. |                                 |  |
| <b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b> | TDM Plantation Sdn Bhd - Kemaman Palm Oil Mill  |                                 |  |
| <b>Location / Address</b>  | KM 121, Jerangau – Jabor Highway, Kemaman, 24101 Terengganu, Malaysia                                 |                                 |  |
| <b>Website</b>   | <a href="http://www.tdmberhad.com.my">www.tdmberhad.com.my</a>  |                                 |  |
| <b>Management Representative</b>                                   | Tuan Haji Hassan Bin Osman  | <b>E-mail</b>                   | <a href="mailto:POM.tdmp@tdmberhad.com.my">Kemaman POM.tdmp@tdmberhad.com.my</a> |
| <b>Telephone</b>   | +60 (9) 822 6566  | <b>Facsimile</b>                | +60 (9) 822 6704   |

| 2. Certification Information                      |   |   |  |
|---|---|---|--|
| <b>Certificate Number</b>                         | RSPO 587626   | <b>Certificate Start Date</b>                       | 21/01/2019                                       |
| <b>Date of First Certification</b>                | 01/11/2013  | <b>Certificate Expiry Date</b>                      | 31/10/2023                                       |
| <b>Scope of Certification</b>                     | Production of Palm Oil and Palm Kernel  |   |  |
| <b>Visit Objectives</b>                           | <p>Determination of the conformity of the client's management system, or parts of it with audit criteria.</p> <p>Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</p>                                |   |  |
| <b>Assessment Cycle</b>                           | <input type="checkbox"/> Pre Assessment (Choose an item.)<br><input type="checkbox"/> Initial Assessment<br><input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_4)<br><input type="checkbox"/> Recertification Assessment (Choose an item.)<br><input type="checkbox"/> Scope Extension |   |  |
| <b>Applicable Standards / Normative Reference</b> | RSPO Certification System for P&C and RSPO ISH 2020<br><input type="checkbox"/> Choose an item.<br><input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil   |   |  |
| <b>Supply Chain Module</b>                        | <input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance   | <b>Mill Capacity</b>                                | 60 MT/Hour                                       |
| <b>ISH certification Phase</b>                    | <input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable   |   |  |
| <b>Is this a remote audit or on-site audit</b>    | <input checked="" type="checkbox"/> On-site audit (Option AI)   | <input type="checkbox"/> On-site audit (Option AII) | <input type="checkbox"/> Remote audit (Option B) |

| <b>3. Other Certifications</b> |  |   |                    |
|--------------------------------|--|---|--------------------|
| <b>Certificate Number</b>      | <b>Standard(s)</b>   | <b>Certificate Issued by</b>              | <b>Expiry Date</b> |
| MSPO 678572                    | MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills                                  | BSI Services Malaysia Sdn Bhd             | 27/09/2023         |
| MSPO 686877                    | MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders | BSI Services Malaysia Sdn Bhd             | 27/09/2023         |
| EU-ISCC-Cert-MY231-2022021     | ISCC EU (International Sustainability and Carbon Certificate)                                | Trans Certification International Sdn Bhd | 16/03/2023         |

| <b>4. Location(s) of Mill &amp; Supply Bases</b>                    |  |                        |                  |
|---|--|------------------------|------------------|
| <b>Name<br/>(Mill / Supply Base / Group Manager / Smallholders)</b> | <b>Location</b>  | <b>GPS Coordinates</b> |                  |
|   |  | <b>Latitude</b>        | <b>Longitude</b> |
| Kemaman Palm Oil Mill   | KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia    | 4°24' 10.80" N         | 103°14' 52.80" E |
| Tebak Estate  | KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia    | 4°25' 48.61" N         | 103°13' 35.40" E |
| Pelantoh Estate   | KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia    | 4°24' 19.23" N         | 103°14' 59.64" E |
| Jernih Estate   | KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia    | 4°26' 24.00" N         | 103°12' 39.59" E |
| Air Putih Estate  | KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia    | 4°15'18.59" N          | 103°12'38.77" E  |
| Gajah Mati Estate   | Lot 140-141, Mukim Bukit Besi, 23200 Dungun, Terengganu, Malaysia      | 4°41' 45.05" N         | 103°12' 23.30" E |
| MAIDAM Estate   | AM9, Bandar Al Muktafi Billah Shah, 23400 Dungun, Terengganu, Malaysia | 4° 39'42.90" N         | 103° 08 '38.00"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 |
| Tebak Estate                  | 2,922.33   | 30.46         | 340.84                      | 3,293.63   | 88.73        |
| Pelantoh Estate               | 3,153.27   | 0.25          | 138.08                      | 3,291.60   | 95.80        |
| Jernih Estate                 | 2,822.07   | 65.46         | 248.07                      | 3,135.60   | 90.00        |
| Air Putih Estate              | 4,042.70   | 187.70        | 121.58                      | 4,351.98   | 94.00        |
| Gajah Mati Estate             | 3,520.87   | 153.13        | 208.78                      | 3,882.78   | 90.68        |
| MAIDAM Estate                 | 755.96   | 6.74          | 151.38                      | 914.08   | 83.32        |
| <b>Total</b>                  | <b>17,217.20</b>   | <b>443.74</b> | <b>1,208.73</b>             | <b>18,869.67</b>   | <b>91.24</b> |

| 6. Plantings & Cycle  |                  |                 |                |                 |                  |                 |
|-----------------------|------------------|-----------------|----------------|-----------------|------------------|-----------------|
| Estate / Smallholders | Age (Years) - ha |                 |                |                 | Mature           | Immature        |
|                       | 0 - 3            | 4 - 14          | 15 - 25        | >25             |                  |                 |
| Tebak Estate          | 419.60           | 419.53          | 901.67         | 1,181.53        | 2,502.73         | 419.60          |
| Pelantoh Estate       | 1,858.27         | -               | -              | 1,295.00        | 1,295.00         | 1,858.27        |
| Jernih Estate         | 663.00           | 307.93          | 1851.14        | -               | 2,159.07         | 663.00          |
| Air Putih Estate      | 82.49            | 2,435.24        | 1,336.21       | 188.76          | 3,960.21         | 82.49           |
| Gajah Mati Estate     | 1,091.90         | 1,673.62        | 755.35         | -               | 2,428.97         | 1,091.9         |
| MAIDAM Estate         | 255.80           | -               | 500.16         | -               | 500.16           | 255.80          |
| <b>Total (ha)</b>     | <b>4,371.06</b>  | <b>4,836.32</b> | <b>5344.53</b> | <b>2,665.29</b> | <b>12,846.14</b> | <b>4,371.06</b> |

**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 (Nov 2021 – Oct 2022) | Actual (Sept 2021 – Sept 2022)                 |   | Forecast (Nov 2022 – Oct 2023) |
|  |   | Previous license period (Sept 2021 – Oct 2021) | Current license period (Nov 2021 – Sept 2022) |                                |
| Pelantoh Estate  | 13,610.00                                 | 2,935.44                                       | 13,626.01                                     | 10,850.00                      |
| MAIDAM Estate  | 2,180.00                                  | 210.57   | 1,289.25                                      | 1,960.00                       |
| Gajah Mati Estate  | 38,500.00                                 | 6,902.73                                       | 24,201.93                                     | 3,580.00                       |

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| Air Putih Estate | 66,748.00         | 11,598.28         | 46,838.24 | 59,892.00         |
| Jernih Estate    | 40,700.00         | 6,962.55          | 25,109.21 | 35,500.00         |
| Tebak Estate     | 35,300.00         | 4,131.14          | 18,270.32 | 27,600.00         |
| <b>Total</b>     | <b>197,038.00</b> | <b>162,075.67</b> |           | <b>139,382.00</b> |

| <b>8. Summary of Certified Tonnage of FFB (from other certified unit(s))</b> |  |  |  |                                       |
|--|--|--|--|---------------------------------------|
| <b>Estate / Smallholders</b>   | <b>Tonnage (MT) / year</b>                       |  |  |                                       |
|  | <b>Estimated last year (Nov 2021 – Oct 2022)</b> | <b>Actual (Sept 2021 – Sept 2022)</b>                |  | <b>Forecast (Nov 2022 – Oct 2023)</b> |
|  |  | <b>Previous license period (Sept 2021 -Oct 2021)</b> | <b>Current license period (Nov 2021 – Sept 2022)</b> |                                       |
| Pinang Emas Estate   |  | 4,546.73   | 12,795.12  |                                       |
| Jerangau Estate  |  | 0.00   | 6,178.25   |                                       |
| <b>Total</b>   |  | <b>23,520.10</b>                                     |  |                                       |

| <b>9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b> |  |  |  |                                 |
|--|--|--|--|---------------------------------|
| <b>Out growers / smallholders</b>  | <b>Tonnage (MT) / year</b>                 |  |  |                                 |
|  | <b>Estimated last year (key in period)</b> | <b>Actual (Sept 2021 – Sept 2022)</b>                |  | <b>Forecast (key in period)</b> |
|  |  | <b>Previous license period (Sept 2021 -Oct 2021)</b> | <b>Current license period (Nov 2021 – Sept 2022)</b> |                                 |
| N/A  | N/A  | N/A  | N/A  | N/A                             |
| <b>Total</b>   | <b>N/A</b>                                 | <b>N/A</b>   |  | <b>N/A</b>                      |

| <b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b> |                     |  |  |                             |
|---|---------------------|--|--|-----------------------------|
| <b>No.</b>  | <b>Month - Year</b> | <b>Volume of FFB from certified supply base (mt)</b> | <b>Volume of FFB from uncertified supply base (mt)</b> | <b>Total FFB/Month (mt)</b> |
| 1   | Sept 2021           | 18,054.17  | 0  | 18,054.17                   |
| 2   | Oct 2021            | 19,233.27  | 0  | 19,233.27                   |
| 3   | Nov 2021            | 19,383.91  | 0  | 19,383.91                   |
| 4   | Dec 2021            | 15,491.88  | 0  | 15,491.88                   |
| 5   | Jan 2022            | 11,944.76  | 0  | 11,944.76                   |
| 6   | Feb 2022            | 10,313.15  | 0  | 10,313.15                   |
| 7   | Mar 2022            | 12,757.84  | 0  | 12,757.84                   |
| 8   | Apr 2022            | 12,070.16  | 0  | 12,070.16                   |
| 9   | May 2022            | 12,945.00  | 0  | 12,945.00                   |

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| 10           | June 2022 | 13,370.24         | 0        | 13,370.24         |
| 11           | July 2022 | 10,016.63         | 0        | 10,016.63         |
| 12           | Aug 2022  | 13,671.72         | 0        | 13,671.72         |
| 13           | Sept 2022 | 16,343.04         | 0        | 16,343.04         |
| <b>TOTAL</b> |           | <b>185,595.77</b> | <b>0</b> | <b>185,595.77</b> |

| <b>10. Summary of Certified Tonnage (MT) (not applicable for ISS)</b> |  |  |   |
|---|--|--|---|
| <b>Estimated last year<br/>(Nov 2020 – Oct 2021)</b>                  | <b>Actual<br/>(Sept 2021 – Sept 2022)</b>        |  | <b>Forecast<br/>(Nov 2022 – Oct 2023)</b> |
|   | Previous license period<br>(Sept 2021 -Oct 2021) | Current license period<br>(Nov 2021 – Sept 2022) |   |
| <b>FFB</b>  | <b>FFB</b>                                       |  | <b>FFB</b>                                |
| 197,038.00 mt   | 37,287.44 mt                                     | 148,308.33 mt                                    | 139,382.00 mt                             |
|   | <b>TOTAL</b>                                     | 185,595.77 mt                                    |   |
| <b>CPO (OER: 20.32 %)</b>   | <b>CPO (OER: 17.57%)</b>                         |  | <b>CPO (OER: 22.11%)</b>                  |
| 40,038.12 mt  | 5,295.78 mt                                      | 28,722.42 mt                                     | 30,821.19 mt                              |
|   | <b>TOTAL</b>                                     | 34,018.20 mt                                     |   |
| <b>PK (KER: 4.78 %)</b>   | <b>PK (KER: 4.70%)</b>                           |  | <b>PK (KER: 5.28%)</b>                    |
| 9,418.42 mt   | 1,674.79 mt                                      | 7,034.64 mt                                      | 7,362.04 mt                               |
|   | <b>TOTAL</b>                                     | 8,709.43 mt                                      |   |
| <b>Note:</b>  |  |  |   |

| <b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b> |                     |                           |                          |
|--|---------------------|---------------------------|--------------------------|
| <b>No.</b>   | <b>Month – Year</b> | <b>Certified CPO (MT)</b> | <b>Certified PK (MT)</b> |
| 1  | Sept 2021           | 1,455.79                  | 837.16                   |
| 2  | Oct 2021            | 3,839.99                  | 837.63                   |
| 3  | Nov 2021            | 4,032.11                  | 964.37                   |
| 4  | Dec 2021            | 2,865.12                  | 890.79                   |
| 5  | Jan 2022            | 2,246.78                  | 570.73                   |
| 6  | Feb 2022            | 2,044.34                  | 554.77                   |
| 7  | Mar 2022            | 2,472.80                  | 661.62                   |
| 8  | Apr 2022            | 2,191.39                  | 617.52                   |
| 9  | May 2022            | 2,423.71                  | 548.35                   |
| 10   | June 2022           | 2,615.57                  | 558.15                   |
| 11   | July 2022           | 2,334.23                  | 504.12                   |
| 12   | Aug 2022            | 2,545.40                  | 488.14                   |

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| 13           | Sept 2022 | 2,950.97         | 676.08          |
| <b>TOTAL</b> |           | <b>34,018.20</b> | <b>8,709.43</b> |

| <b>11. Summary of Actual Volume sold</b>              |                |                         |        |              |           |
|---|----------------|-------------------------|--------|--------------|-----------|
| <b>Current License period (Nov 2021 – Sept 2022)</b>  |                |                         |        |              |           |
|   | RSPO Certified | Other Schemes Certified |        | Conventional | Total     |
|   |                | ISCC                    | Others |              |           |
| <b>CPO (MT)</b>                                       | 27,308.42      | 0                       | 0      | 0            | 27,308.42 |
| <b>PK (MT)</b>  | 6,631.84       | 0                       | 0      | 0            | 6,631.84  |
| <b>Credits</b>  | 0              | 0                       | 0      | 0            | 0         |
| <b>Previous License period (Sept 2021 – Oct 2021)</b> |                |                         |        |              |           |
| <b>CPO (MT)</b>                                       | 5,295.78       | 0                       | 0      | 0            | 5,295.78  |
| <b>PK (MT)</b>  | 1,674.79       | 0                       | 0      | 0            | 1,674.79  |
| <b>Credits</b>  | 0              | 0                       | 0      | 0            | 0         |

| <b>11A. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b> |             |                                  |                         |                                  |                        |
|--|-------------|----------------------------------|-------------------------|----------------------------------|------------------------|
| No.  | Buyers Name | Palmtrace Trading License Number | Certified CPO Sold (mt) | Palmtrace Trading License Number | Certified PK Sold (mt) |
| 1  | Buyer ABC   | TR-0320b547-b485                 | 477.4                   | TR-b6ce6809-1c54                 | 189.25                 |
|  |             | TR-f7340a08-ba6f                 | 206.5                   | TR-5f0f330f-2cf6                 | 647.91                 |
|  |             | TR-568df7ed-7e4e                 | 200                     |                                  |                        |
|  |             | TR-0358d173-3a3a                 | 204.31                  |                                  |                        |
|  |             | TR-54c1c1d7-a876                 | 199.96                  |                                  |                        |
|  |             | TR-86b57d37-2fb3                 | 167.62                  |                                  |                        |
| 2  | Buyer ABC   | TR-384c84ba-0bd9                 | 413.93                  | TR-75f70603-b8d7                 | 2.09                   |
|  |             | TR-a8bcf6d3-7298                 | 168.75                  | TR-c79ac3a9-f041                 | 760                    |
|  |             | TR-d7f2d980-07ea                 | 500                     | TR-31b4a00c-da3a                 | 75.54                  |
|  |             | TR-d35be2ab-da5e                 | 200.4                   |                                  |                        |
|  |             | TR-41e29068-5062                 | 200                     |                                  |                        |
|  |             | TR-9f5b30f2-4055                 | 200                     |                                  |                        |
|  |             | TR-9b412de5-8c8f                 | 167.65                  |                                  |                        |
|  |             | TR-92dd2f8b-27f9                 | 461.17                  |                                  |                        |
|  |             | TR-5c47defb-1bc6                 | 499.58                  |                                  |                        |
|  |             | TR-d10df9cd-c49c                 | 252.16                  |                                  |                        |

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|   |           | TR-b07a08bd-d785 | 201.96 |                  |        |
|   |           | TR-0f27bca8-3de6 | 4.14   |                  |        |
|   |           | TR-d770bf26-6b4f | 245.86 |                  |        |
|   |           | TR-6edf4136-bd6a | 200    |                  |        |
|   |           | TR-80ee7b5f-9f8c | 77.2   |                  |        |
|   |           | TR-a98d5625-ba91 | 47.19  |                  |        |
| 3 | Buyer ABC | TR-7c7f5827-bf52 | 152.81 | TR-4ba1ea98-633f | 684.46 |
|   |           | TR-62e3ebab-c937 | 126.74 | TR-aaeec29f-b845 | 279.91 |
|   |           | TR-54cd6aec-6686 | 24.78  |                  |        |
|   |           | TR-e64bbe13-80da | 500    |                  |        |
|   |           | TR-77e18fc0-965c | 300    |                  |        |
|   |           | TR-bf32b866-1020 | 500    |                  |        |
|   |           | TR-0501c9e6-5768 | 6.1    |                  |        |
|   |           | TR-d8490896-2110 | 94.77  |                  |        |
|   |           | TR-4b544e58-8ace | 100    |                  |        |
|   |           | TR-cb74b306-17c7 | 250.01 |                  |        |
|   |           | TR-881d9486-4bad | 200    |                  |        |
|   |           | TR-26021ed0-6766 | 49.92  |                  |        |
|   |           | TR-7a079f52-92a3 | 100    |                  |        |
|   |           | TR-8f74f4fe-ced7 | 100    |                  |        |
|   |           | TR-9bde094a-bc3a | 500    |                  |        |
|   |           | TR-4a298a46-fe9a | 120.24 |                  |        |
|   |           | TR-f8fea792-b13f | 498.73 |                  |        |
|   |           | TR-1f7911a1-0b91 | 252.98 |                  |        |
|   |           | TR-13f724e2-98fe | 200.35 |                  |        |
|   |           | TR-1d43ad8f-593c | 61.13  |                  |        |
|   |           | TR-8aa655f4-0509 | 100    |                  |        |
| 4 | Buyer ABC | TR-5151b04c-cb10 | 100    | TR-875837c2-576c | 200    |
|   |           | TR-30f17f08-7bcc | 191.31 | TR-b7dc9e1a-3e33 | 170.09 |
|   |           | TR-b69911f2-340b | 39.29  | TR-3a7ba514-9bb3 | 520.7  |
|   |           | TR-d943294b-7acb | 38.23  |                  |        |
|   |           | TR-846ba320-6d36 | 500    |                  |        |
|   |           | TR-33eec6d2-6e5c | 103.14 |                  |        |
|   |           | TR-f0184e86-3c49 | 202.58 |                  |        |
|   |           | TR-0b78a9d4-0a8b | 497.9  |                  |        |
|   |           | TR-b333d39e-0eae | 500    |                  |        |

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|   |           |                  |        |                  |        |
|---|-----------|------------------|--------|------------------|--------|
|   |           | TR-1ec6d045-5cbd | 486.22 |                  |        |
| 5 | Buyer ABC | TR-758511cd-185c | 13.78  | TR-016e6844-4083 | 23.3   |
|   |           | TR-c7d7d3f5-e865 | 200    |                  |        |
| 6 | Buyer ABC | TR-d6d31bfa-2184 | 500    | TR-8f8c7c35-9fee | 117.43 |
|   |           | TR-4f963699-dc96 | 491.99 | TR-71127366-0ad5 | 430    |
|   |           | TR-87d7b4f2-d8f5 | 128.56 | TR-7da65db4-e705 | 312.57 |
|   |           | TR-4a39e47b-8b69 | 417.38 | TR-7f4fff64-7104 | 27.2   |
|   |           | TR-8dcfb16b-7da3 | 200    | TR-62236376-3a5d | 215    |
|   |           | TR-df2cbde4-e731 | 295.07 |                  |        |
|   |           | TR-e6fe2789-4d9f | 8.01   |                  |        |
|   |           | TR-2bf3e297-0a07 | 133.38 |                  |        |
|   |           | TR-52bd5a72-4126 | 100    |                  |        |
|   |           | TR-21036ede-c25b | 100    |                  |        |
|   |           | TR-0eb58bf1-1da6 | 104.12 |                  |        |
|   |           | TR-fac9695e-a861 | 106.38 |                  |        |
|   |           | TR-c19760e7-78ff | 500.18 |                  |        |
|   |           | TR-0428542e-165f | 121.66 |                  |        |
|   |           | TR-16843242-652f | 500    |                  |        |
|   |           | TR-aa5eea31-d2f0 | 365.19 |                  |        |
|   |           | TR-e41d788d-1f70 | 5.42   |                  |        |
| 7 | Buyer ABC | TR-d084748f-540e | 134.81 | TR-bc4ccfcd-c834 | 258.82 |
|   |           | TR-e63d971b-1486 | 81.72  |                  |        |
|   |           | TR-a8204aae-be66 | 66.62  |                  |        |
|   |           | TR-d6d7c07c-c25d | 201.13 |                  |        |
|   |           | TR-7d04c5ae-414a | 500    |                  |        |
|   |           | TR-45b80176-dbf0 | 418.08 |                  |        |
|   |           | TR-39164351-a88d | 500.72 |                  |        |
|   |           | TR-15080659-61bf | 161.4  |                  |        |
|   |           | TR-dce427ff-5f45 | 200    |                  |        |
|   |           | TR-20fd7acd-8228 | 208.32 |                  |        |
| 8 | Buyer ABC | TR-ebfa0baa-9882 | 200    | TR-290d5f05-0f32 | 171.18 |
|   |           | TR-fd0d58f3-1d18 | 40.11  | TR-e7a0eb24-2d8f | 200    |
|   |           | TR-312f3044-c87e | 41.68  | TR-206ff8b1-fc7b | 246.34 |
|   |           | TR-cd70a855-255d | 500    |                  |        |
|   |           | TR-12c69b5b-7d66 | 76.5   |                  |        |
|   |           | TR-88d617f3-3dc4 | 90.72  |                  |        |

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|    |           | TR-3a9ff44f-ccfb | 204.18 |                  |        |
|    |           | TR-64974056-62f7 | 250    |                  |        |
|    |           | TR-e0d52869-646d | 500.77 |                  |        |
|    |           | TR-ac6febe8-9ced | 83.38  |                  |        |
| 9  | Buyer ABC | TR-cc661daa-122c | 204.05 | TR-53dd26b6-7b99 | 183.66 |
|    |           | TR-7b8f75bd-a2a0 | 200    | TR-95636072-402a | 62.4   |
|    |           | TR-0a565590-1741 | 500    | TR-1848ed1e-314d | 215    |
|    |           | TR-a4eb8dfa-e75a | 497.99 |                  |        |
|    |           | TR-16ced5fb-4a01 | 409.28 |                  |        |
|    |           | TR-ee4685d2-7278 | 401.4  |                  |        |
|    |           | TR-040c7dde-262e | 163.85 |                  |        |
|    |           | TR-f4c38ab1-ce2e | 251.19 |                  |        |
| 10 | Buyer ABC | TR-9404ff8b-0fd5 | 40.14  | TR-c242eaaf-8289 | 150    |
|    |           | TR-f360a1fa-5eb7 | 43.86  | TR-1e01d66c-6626 | 63.6   |
|    |           | TR-1c4130eb-8b90 | 98.6   | TR-032774dc-b1d3 | 84.16  |
|    |           | TR-afde27fc-3d3e | 125.11 | TR-a7686a19-fa72 | 347.68 |
|    |           | TR-275f8d3b-06e3 | 100    |                  |        |
|    |           | TR-f1ce741d-5d62 | 500    |                  |        |
|    |           | TR-77db0752-b33f | 8.84   |                  |        |
|    |           | TR-7240c0a6-fde7 | 100    |                  |        |
|    |           | TR-9441d2e9-6df6 | 200    |                  |        |
|    |           | TR-cbb64c6d-6480 | 109.98 |                  |        |
|    |           | TR-dfb8bb8b-968b | 100    |                  |        |
|    |           | TR-55b644ed-b835 | 500    |                  |        |
|    |           | TR-03a48dc1-0e97 | 6.13   |                  |        |
|    |           | TR-9ca4cf81-1235 | 99.05  |                  |        |
|    |           | TR-21d2b89f-1e56 | 498.9  |                  |        |
|    |           | TR-367103d1-ad93 | 84.96  |                  |        |
| 11 | Buyer ABC | TR-1ad6cf71-12bb | 208.24 | TR-97d2a1ea-5f5d | 128.52 |
|    |           | TR-62dfba73-395b | 200    | TR-a8499665-dd2e | 23.32  |
|    |           | TR-2bc59e30-6f0e | 8.84   | TR-d05223f4-c729 | 252.28 |
|    |           | TR-93a034c8-fd41 | 390.02 | TR-19394190-4967 | 100    |
|    |           | TR-4c51a596-5c33 | 115.04 |                  |        |
|    |           | TR-e27c921f-c224 | 149.84 |                  |        |
|    |           | TR-095a4889-f8f7 | 500    |                  |        |
|    |           | TR-957f78bd-6ae9 | 48.98  |                  |        |

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|              |           | TR-0e6f7eff-47c1 | 421.62           |                  |                 |
|              |           | TR-67c67b01-72eb | 291.65           |                  |                 |
| 12           | Buyer ABC | TR-dc7d4d09-f8c8 | 100              | TR-08e32893-3f6d | 80.81           |
|              |           | TR-2f145c04-9e3b | 100              | TR-da7fdadd-295f | 285.72          |
|              |           | TR-8be15df8-9b1a | 8.35             | TR-26cf8b88-3edc | 81.78           |
|              |           | TR-6ece1ad6-2f26 | 300              | TR-2f7dbccb-cfc0 | 39.83           |
|              |           | TR-a9329137-fea3 | 51.02            |                  |                 |
|              |           | TR-c670776c-ad1f | 19.5             |                  |                 |
|              |           | TR-94c2f39a-9719 | 200              |                  |                 |
|              |           | TR-59f35ae0-b15d | 369.54           |                  |                 |
|              |           | TR-5b61969e-83b8 | 48.11            |                  |                 |
|              |           | TR-d16f37ef-b874 | 510              |                  |                 |
|              |           | TR-b7888986-59f0 | 338.88           |                  |                 |
|              |           | TR-d16fdc1d-0872 | 500              |                  |                 |
| 13           | Buyer ABC | TR-9b63df58-dcff | 111.28           | TR-8fff6ce2-dd1c | 514.7           |
|              |           | TR-d7827ab6-93e7 | 460.88           | TR-4af1f82e-e443 | 24.53           |
|              |           | TR-c20541e6-8d49 | 500              | TR-269f8bfb-0855 | 136.85          |
|              |           | TR-95be1539-228e | 9.36             |                  |                 |
|              |           | TR-96f00d0a-c394 | 100              |                  |                 |
|              |           | TR-502a947e-ade8 | 100              |                  |                 |
|              |           | TR-dd45c9a2-0c95 | 5.45             |                  |                 |
|              |           | TR-73cb0115-f43d | 250              |                  |                 |
| <b>TOTAL</b> |           |                  | <b>32,604.20</b> |                  | <b>8,306.63</b> |

| 11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any) |             |             |                         |                        |
|---|-------------|-------------|-------------------------|------------------------|
| No.   | Buyers Name | Scheme Name | Certified CPO Sold (MT) | Certified PK Sold (MT) |
| NA  | NA          | NA          | NA                      | NA                     |
| <b>TOTAL</b>  |             |             | <b>NA</b>               | <b>NA</b>              |

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

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| 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 |
| NA  | NA          | NA                               | NA                                 |
| <b>TOTAL</b>  |             |                                  |                                    |

| 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  |                                      |      | NA   |                         |      | NA   |                           |      | NA   |
| IS-CSPO  | NA                                   | NA   |      | NA                      | NA   |      | NA                        | NA   |      |
| IS-CSPKO   | NA                                   | NA   |      | NA                      | NA   |      | NA                        | NA   |      |
| IS-CSPKE   | NA                                   | NA   |      | NA                      | NA   |      | NA                        | NA   |      |
| CSPK   | NA                                   | NA   |      | NA                      | NA   |      | NA                        | NA   |      |

| 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) |
| NA   | NA           | NA        | NA                 | NA                | NA                 | NA                 |
| <b>TOTAL</b>   |              | <b>NA</b> | <b>NA</b>          | <b>NA</b>         | <b>NA</b>          | <b>NA</b>          |

**Note:** 1 mt = 1 credit

| 13. Independent Smallholders Actual Sold Tonnage / Volume |     |                  |                   |         |      |          |          |
|---|-----|------------------|-------------------|---------|------|----------|----------|
|   | FFB | FFB Conventional | FFB Other schemes | IS-CSPO | CSPK | IS-CSPKO | IS-CSPKE |
| <b>Current License period (not applicable)</b>            |     |                  |                   |         |      |          |          |
| Credits   |     |                  |                   | N/A     | N/A  | N/A      | N/A      |
| Physical  | N/A | N/A              | N/A               |         |      |          |          |
| <b>Previous License period (not applicable)</b>           |     |                  |                   |         |      |          |          |
| Credits   |     |                  |                   | N/A     | N/A  | N/A      | N/A      |
| Physical  | N/A | N/A              | N/A               |         |      |          |          |

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

## 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](mailto:Chaiyaporn.Seekao@bsigroup.com))  
Website: [www.bsigroup.com](http://www.bsigroup.com)

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

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **25-27/10/2022**. 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 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 Critical NC close out on-site assessment was conducted on **18/12/2022**. The audit programs are included in Section 2.3.

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

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

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

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

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

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

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

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

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

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

\*Note: 6 estates will be sample in the Recertification 2 audit to comply with RSPO certification systems requirement.

**Tentative Date of Next Visit: October 23, 2023 - October 25, 2023**

**Total Number of Mandays: 15 mandays**

**2.2 BSI Assessment Team**

| <b>Name</b>             | <b>Role</b> | <b>Competency</b>  |
|-------------------------|-------------|--|
| Nor Halis Abu Zar (NHA) | Team Leader | <p><b>Education:</b> Holds a Bachelor of Science in Plantation Technology and Management, University Technology Mara</p> <p><b>Work Experience:</b> 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><b>Training attended:</b> 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><b>Language proficiency:</b> Bahasa Malaysia and English.</p> |

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|  |                    |  |
|--|--------------------|--|
|  |                    | <p><b>Aspect covered in this audit:</b> Occupation Health Safety requirement, HIRARC, Environment responsibility, training, environment impact assessment and management plan. Fluent in English.</p>  |
| <p>Mohamed Zainal (MHZ)</p> <p>Hidhir Abidin</p> | <p>Team Member</p> | <p><b>Education:</b> Holds a Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006.</p> <p><b>Work Experience:</b> 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><b>Training attended:</b> He has completed ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, MSPO Awareness Training, Endorsed RSPO SCCS Lead Auditor Course, HCV &amp; HCS Introductory Training, SMETA Requirements Training and the required RSPO P&amp;C and SCCS refresher training.</p> <p><b>Language proficiency:</b> Bahasa Malaysia and English.</p> <p><b>Aspect covered in this audit:</b> Policy and commitment, Social requirements, contract agreement, human rights, workers’ welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land &amp; Legal issue and RSPO supply chain requirements. Fluent in English.</p>   |
| <p>Muhammad Fadzli Masran (MFM)</p>              | <p>Team Member</p> | <p><b>Education:</b> Holds a Bachelor Degree in Forestry Science, University Putra Malaysia</p> <p><b>Work Experience:</b> He has more than 10 years working experience in palm oil estate as Assistant Manager managing operations and sustainability implementation experience including workers’ welfare, workers’ occupational, health &amp; safety, environment conservation and protection at buffer areas and continuous improvement management plans. He involved in internal auditing on ISO9001 and ISO14001 standards.</p> <p><b>Training attended:</b> He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course, Endorsed RSPO Lead Auditor Course, MSPO Lead Auditor Course, Endorsed RSPO Supply Chain Certification training course, MSPO Supply Chain Certification System (SCCS) Auditor training Course, CQI and IRCA Certified ISO 9001:2015 Lead Auditor Training Course, HCV and GIS Training, SMETA Requirements Training and the required RSPO P&amp;C and SCCS refresher training.</p> <p><b>Language proficiency:</b> Bahasa Malaysia and English.</p> <p><b>Aspect covered in this audit:</b> Economic management plan, mill best practices, estate best practices, natural and biodiversity conservation, Waste management, GHG, HCV, and RSPO supply chain requirements. Fluent in English.</p> |
|  | <p>Peer Review</p> | <p><b>Nil</b></p>  |

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**Accompanying Persons:**

| Name                         | Role     |
|------------------------------|----------|
| Mohd Nur Amin bin Mohd Halim | Observer |

**2.3 Assessment Plan**

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

| Date  | Time          | Subjects   | NHA | MHZ | MFM |
|---|---------------|--|-----|-----|-----|
| Monday,<br>24/10/2022                       | -             | Audit Team Travel from Kuala Lumpur to Kemaman, Terengganu   | √   | √   | √   |
| Tuesday,<br>25/10/2022<br>Gajah Mati Estate | 08.30 – 09.00 | Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Confirmation of assessment scope and finalize Audit plan</li> </ul>  | √   | √   | √   |
|   | 09.00 – 12.30 | Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.                  | √   | √   | √   |
|   | 12.30 – 13.30 | Lunch  | √   | √   | √   |
|   | 13.30 – 16.30 | Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.) | √   | √   | √   |
|   | 16.30 – 17.00 | Interim Closing briefing.  | √   | √   | √   |
| Wednesday,<br>26/10/2022<br>Kemaman POM     | 08.30 – 12.30 | Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.      | √   | √   | √   |
|   | 10.00 – 12.00 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)   |     | √   |     |
|   | 12.30 – 13.30 | Lunch  | √   | √   | √   |

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| Date                                    | Time                 | Subjects  | NHA                                    | MHZ | MFM |
|---|----------------------|---|--|-----|-----|
|   | 13.30 – 16.30        | Lab, weighbridge and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation.<br><br>RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records. | √                                      | √   | √   |
|   | 16.30 – 17.00        | Interim Closing briefing.   | √                                      | √   | √   |
| Thursday<br>27/10/2022<br>Jernih Estate | 08.30 – 12.30        | Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.   | √                                      | √   | √   |
|   | 12.30 – 13.30        | Lunch   | √                                      | √   | √   |
|   | 13.30 – 16.30        | Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)  | √                                      | √   | √   |
|   | 16.30 – 17.00        | Audit Team Discussion and Preparation of audit report   | √                                      | √   | √   |
|   | 17.00 – 17.30        | Closing Meeting   | √                                      | √   | √   |
|   | Friday<br>28/10/2022 | -   | Audit Team travel back to Kuala Lumpur | √   | √   |

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| Date                            | Time             | Subjects  | NHA |
|---------------------------------|------------------|---|-----|
| Saturday<br>17/12/2022          | -                | Auditor Travelling  | √   |
| Sunday<br>18/12/2022            | 08.30 –<br>09.00 | Opening Meeting:<br>Opening Presentation by Audit team leader.<br>Confirmation of assessment scope and finalize Audit plan  | √   |
| 08.30 – 11.30<br>Kemaman<br>POM | 09.00 –<br>11.00 | <ul style="list-style-type: none"> <li>• Verification on previous Major NC:               <ol style="list-style-type: none"> <li>1. 2266495-202210-M1</li> <li>2. 2266495-202210-M2</li> </ol> </li> <li>• Site observation, workers interview (individual and group session) if necessary</li> <li>• Document review – implemented evidence</li> </ul> | √   |
|                                 | 11.00 –<br>11.30 | Closing Meeting   | √   |
|                                 | 11.30 –<br>13.30 | Audit travel  | √   |

### Section 3: Assessment Findings

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

| Requirement  | Assessment  | Compliance |
|--|---|------------|
| Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?   | Yes. Please refer to Approved Time Bound Plan for details on the mills and estates of TDM Plantation Sdn. Bhd. Group.   | Complied   |
| Have all the estates and mills certified within five (5) years after obtaining RSPO membership?<br>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021  | Except for the newly acquired Bukit Bidong Estate, all estates and mills in Malaysia has been certified within five years. Certification for sites in Indonesia has been deemed unnecessary as the operation and management control are already transferred to Ikhasas Sawit Sdn. Bhd. Refer latest communication with RSPO by email dated 19/12/2022 | 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.<br>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, there is newly acquired estate from Tabung Haji Plantation (Bukit Bidong Estate) on 01/08/2020. The newly acquired TDM-YT Bukit Bidong Estate has been planned to be audited and certified by August 2023. Refer latest communication with RSPO by email dated 27/07/2022.   | Complied   |
| Any deviations from the maximum periods requires approval by the RSPO Secretariat.   | As of now there are no deviations on the period required for approval by the RSPO Secretariat.  | Complied   |
| Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.<br>Is this consistent with the ACOP reporting?   | No, there are no changes to the time bound plan since the last audit. ACOP Reporting has been verified and found to be consistent.  | Complied   |
| Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised  | No, there has not been any isolated lapses in the implementation of the plan.   | Complied   |
| Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised  | No, there is no fundamental failure in implementation of the plan.  | Complied   |
| <b>Un-Certified Units or Holdings</b>  |   |            |
| No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.  | No replacement of forest or any HCV area after dates defined in this Criterion 7.12 involving primary forest. Newly acquired TDM-YT Bukit Bidong Estate has already conducted it's HCV assessment by Sabarinah & Associates Sdn. Bhd. and now pending its   | Complied   |

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|---|--|----------|
|   | report which will be received by November 2022.  |          |
| Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.  | No new plantings since 1 <sup>st</sup> January 2010 that requires compliance with the RSPO New Plantings Procedure.  | Complied |
| Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.  | Based on RSPO RACP tracker, there are 2 cases of Management Units with potential liability, Concept Note and Remediation Plan required. These 2 cases involving Indonesia operations which already been sold and TDM-YT Bukit Bidong Estate which already conducted it's HCV assessment and pending its report which will be used to finish up LUCA and RaCP.  | Complied |
| Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2  | No labour dispute reported in the uncertified units.   | Complied |
| Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1   | No legal non-compliance reported in the uncertified unit (TDM-YT Bukit Bidong Estate).   | Complied |
| Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified. | Yes, internal audit was done and the uncertified unit which is TDM-YT Bukit Bidong Estate need to conduct HCV & SIA assessment which the report will be used to finalize LUCA report. HCV assessment was conducted by Sabarinah & Associates Sdn. Bhd. on 27 <sup>th</sup> October 2022 and SIA was conducted by Green Sustainability Sdn. Bhd. on 18 <sup>th</sup> October 2022. Both assessments are now pending final report. | 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?                                 | Yes, TDM-YT Bukit Bidong Estate is lacking it's HCV and SIA reports which already in progress of completion and pending reports. Communication with RSPO also already been made and they are waiting for the LUCA report to be finalized after TDM received the HCV report.  | Complied |
| Have there been any stakeholder (including NGO) consultation conducted?   | Yes. Stakeholders including NGO were consulted in the uncertified unit and documented.   | Complied |

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

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

**Approved Time Bound Plan**

| No. | Name of the Estate and Mills  |  | TBP for certification | Status as at 24/10/2022 | Any unresolved (Labour Disputes / Land conflicts / Legal Non-Compliance etc) |
|-----|---|--|-----------------------|-------------------------|--|
| 1   | TDM Plantation Sdn. Bhd.<br><b>Tebak Estate</b> , Kemaman, Terengganu, Malaysia     | Supply base for TDM Plantation Sdn. Bhd. Kemaman Palm Oil Mill, Kemaman, Terengganu, Malaysia.   | November 2013         | Certified               | None   |
| 2   | TDM Plantation Sdn. Bhd.<br><b>Pelantoh Estate</b> , Kemaman, Terengganu, Malaysia  |  | November 2013         | Certified               | None   |
| 3   | TDM Plantation Sdn. Bhd.<br><b>Jernih Estate</b> , Kemaman, Terengganu, Malaysia    |  | November 2013         | Certified               | None   |
| 4   | TDM Plantation Sdn. Bhd.<br><b>Air Putih Estate</b> , Kemaman, Terengganu, Malaysia |  | November 2013         | Certified               | None   |
| 5   | TDM Plantation Sdn. Bhd.<br><b>Gajah Mati Estate</b> , Dungun, Terengganu, Malaysia |  | November 2013         | Certified               | None   |
| 6   | TDM Plantation Sdn. Bhd.<br><b>MAIDAM Estate</b> , Dungun, Terengganu, Malaysia     |  | November 2013         | Certified               | None   |
| 1   | TDM Plantation Sdn. Bhd.<br><b>Tayor Estate</b> , Setiu, Terengganu, Malaysia       | Supply base for TDM Plantation Sdn. Bhd. Sungai Tong Palm Oil Mill, Setiu, Terengganu, Malaysia. | December 2013         | Certified               | None   |

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| 2 | TDM Plantation Sdn. Bhd.<br><b>Pelong Estate</b> , Setiu, Terengganu, Malaysia            |                  | December 2013           | Certified   | None |
| 3 | TDM Plantation Sdn. Bhd.<br><b>Jaya Estate</b> , Setiu, Terengganu, Malaysia              |                  | December 2013           | Certified   | None |
| 4 | TDM Plantation Sdn. Bhd.<br><b>Fikri Estate</b> , Setiu, Terengganu, Malaysia             |                  | December 2013           | Certified   | None |
| 5 | TDM Plantation Sdn. Bhd.<br><b>Pinang Emas Estate</b> , Dungun, Terengganu, Malaysia      |                  | December 2013           | Certified   | None |
| 6 | TDM Plantation Sdn. Bhd.<br><b>Jerangau Estate</b> , Ajil, Terengganu, Malaysia           |                  | December 2013           | Certified   | None |
| 7 | TDM Plantation Sdn. Bhd.<br><b>Bukit Bidong Estate</b> , Permaisuri, Terengganu, Malaysia | To be determined | Latest by December 2023 | In progress | None |

### 3.3 Details of Nonconformities

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

During this Assessment there were 2 (two) Critical; 2 (two) Minor nonconformities and 0 (none) Opportunity For Improvement raised. The Kemaman Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

| Non-conformity                                     |   |                     |            |
|--|---|---------------------|------------|
| <b>NCR Ref #</b>                                   | 2266495-202210-M1   | <b>Issued Date</b>  | 27/10/2022 |
| <b>Due Date</b>                                    | 26/01/2022  | <b>Closure Date</b> | 26/12/2022 |
| <b>Indicator &amp; Category (Critical / Minor)</b> | 3.6.2 – Critical Non Conformity   |                     |            |
| <b>Statement of Nonconformity:</b>                 | The Implementation of H&S Plan for the risks to people not fully monitored.   |                     |            |
| <b>Requirement Reference:</b>                      | The effectiveness of the H&S plan to address health and safety risks to people is monitored.  |                     |            |
| <b>Objective Evidence:</b>                         | During site inspection at workshop Kemaman POM, Workshop area, it was found that Petrol were store in the container without any labelled. It was not in line with CHRA Recommendation Section 5.2 and 7.0 USECHH Labelling and Relabelling (USECHH 2000, Regulation 20 & 21), (3) 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 and SOP Chemical Management dated 01/09/2022 Section 4.0 Procedures For handling (c) Ensure that the container is properly label, not damaged and no spillage during handling. |                     |            |
| <b>Corrections:</b>                                | To replace the container with proper labelling accordingly and make sure the container in good condition which not damaged and no spillage during handling the chemical.  |                     |            |
| <b>Root Cause Analysis:</b>                        | Lack of awareness related to chemical management among the workers.   |                     |            |
| <b>Corrective Actions:</b>                         | To regularly conduct inspection to monitor practising for chemical handling and management.<br>To continue arranging a proper refreshment training session for the workers.<br>The signage PENGENDALIAN YANG BETUL BAHAN KIMIA/TERJADUAL will be place to give understanding among the workers.   |                     |            |
| <b>Assessment Conclusion:</b>                      | Major NC Close Out<br>1. Replacement of the containers has been carried out and proper labelling has been done immediately.<br>2. Regular inspection on chemical handling has been conducted. Refer Checklist Jadual Pembersihan Mingguan KPOM dated October 2022 and November 2022. Refer Section Workshop No. 3 "Memastikan Bahan Kimia dan Bahan buangan terjadual di letakkan di Kawasan yang betul dan dikendalikan dengan baik".  |                     |            |

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|  | <p>3. Refreshment training on chemical handling has been given to workers. Refer Training "Taklimat Pengurusan bahan Kimia Dan Bahan Buangan Terjadual dated 27/10/2022 at Kemaman Palm Oil Mill Office. Refer training material item no 2,3 and 4. Sighted training material, attendance and photos.</p> <p>4. Signage has been placed at workshop. Verified through site inspection, signage "Sila Pastikan Bahan Kimia Dan Bahan Buangan Terjadual Di Kendalikan Dengan Cara Yang Betul" has been placed. Additional signage has been placed which is "Bahan Kimia @ Bahan Buangan Terjadual Yang Di Pindahkan Perlu Di Label Semula" and "Di Larang Menggunakan Bekas Makanan Untuk Mengisi Bahan Kimia @ Barang Buangan Terjadual".</p> <p>Based on the above evidence, the major Non-Conformity is closed effectively on 26/12/2022 after the onsite NC closure date on 18/12/2022 due to pending information required. Continuous implementation will be further verified in the next assessment.</p> |
|--|--|

| Non-conformity                                     |  |                     |            |
|--|--|---------------------|------------|
| <b>NCR Ref #</b>                                   | 2266495-202210-M2  | <b>Issued Date</b>  | 27/10/2022 |
| <b>Due Date</b>                                    | 26/01/2022   | <b>Closure Date</b> | 26/12/2022 |
| <b>Indicator &amp; Category (Critical / Minor)</b> | 6.1.2 – Critical Non Conformity  |                     |            |
| <b>Statement of Nonconformity:</b>                 | Recruitment fees (permit renewal fees) was charged to foreign workers  |                     |            |
| <b>Requirement Reference:</b>                      | Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.   |                     |            |
| <b>Objective Evidence:</b>                         | <p>Jernih Estate</p> <p>Evidence of salary deduction under description (potongan permit kerja) was sighted in the pay slip for November 2021 and July 2022 for the following workers:</p> <ol style="list-style-type: none"> <li>1. JN1800824 (Nov 21: RM 42.60)</li> <li>2. JN1400633 (July 22: RM 42.50)</li> <li>3. JN1900900 (Nov 21: RM 42.50)</li> <li>4. JN1000396 (July 22: RM 42.50)</li> <li>5. JN1100486 (Nov 21: RM 42.50)</li> <li>6. JN1600750 (July 22: RM 42.50)</li> </ol> <p>Based on company circular ref: TDMP/SMP/3/01.06 dated 15/4/2009, PLKS has to be paid by employee.</p> |                     |            |
| <b>Corrections:</b>                                | Management will make a refund on deduction to the workers for PLKS renewal started May 2021 until September 2022.  |                     |            |
| <b>Root Cause Analysis:</b>                        | The Estate Management did not receive any letter or memo from HQ TDMP regarding of deduction to the workers for PLKS renewal as per RSPO regulation as at May 2021 (clause 6.1.2) because lack of understanding about regulation demands. The management understand that PLKS is free of charge and deduction (RM85.00) is understood to be an external cost from PLKS. However the deduction (RM85.00) is included in the cost of PLKS.   |                     |            |

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| <b>Corrective Actions:</b>    | The HQ TDMP has issue a new circular letter (TDMP/OD/FW/32/22 dated 27/11/2022) stated that salary deductions for PLKS renew are not allowed, this means that the management will cover all the expenses of PLKS renewal as per RSPO Regulation as at May 2021 (clause 6.1.2)  |
| <b>Assessment Conclusion:</b> | <p>Major NC Close Out</p> <ol style="list-style-type: none"> <li>1. Refund on deduction to the workers for Permits and passport cost has been prepared and will be paid on 20/12/2022. Refer evidence document Cash Requisition Form for Advance December 2022 dated 14/12/2022 prepared by Chief Clerk, verified by Assistant Manager and approved by Manager.</li> <li>2. New circular has been issue and kept by the operating units. Refer "Memorandum Bayaran Pas Lawatan Kerja Sementara (PLKS) Dan Pembaharuan Passport" dated 27/11/2022 with reference document TDMP/OD/FW/32/22.</li> <li>3. Enforcement on the new circular has been circulate to all management units via email dated 27/11/2022 from Mr Muhamad Shawal Endut on behalf Manager "Pengurus Tenaga Kerja Dan Pengurusan Keselamatan".</li> </ol> <p>Based on the above evidence, the major Non-Conformity is closed effectively on 26/12/2022 after the onsite NC closure date on 18/12/2022 due to pending information required. Continuous implementation will be further verified in the next assessment.</p> |

| Non-conformity                                     |   |                     |                                   |
|--|---|---------------------|-----------------------------------|
| <b>NCR Ref #</b>                                   | 2266495-202210-N1   | <b>Issued Date</b>  | 27/10/2022                        |
| <b>Due Date</b>                                    | Next Assessment (Recertification)   | <b>Closure Date</b> | Next Assessment (Recertification) |
| <b>Indicator &amp; Category (Critical / Minor)</b> | 2.2.2 – Minor Non Conformity  |                     |                                   |
| <b>Statement of Nonconformity:</b>                 | Evidence of legal due diligence of all contracted third parties were not effectively demonstrated   |                     |                                   |
| <b>Requirement Reference:</b>                      | Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.   |                     |                                   |
| <b>Objective Evidence:</b>                         | <p>Gajah Mati Estate</p> <p>Employment letter dated 1/1/22 between Nantha Agency and employee with ID:6?##3*-11-\$\$27 has not included pertinent terms and conditions as per Employment Act 1959. No details of employee's entitlement (i.e rest day, annual leave, sick leave) in the employment contract. Further check on the salary voucher dated 6/9/2022 (August 2022 wage month), no EIS contribution in the pay slip. Contribution for EPF and SOCSO were not in accordance with monthly contribution rate (third schedule for EPF) and rate of contribution (Act 4).</p> <p>JA Warisan Mekar Sdn Bhd employee's ID: &amp;*#@17-11-\$\$99 pay slip checked:</p> <ol style="list-style-type: none"> <li>i. EIS and SOCSO contribution was not in accordance with monthly contribution rate (third schedule for EPF) and rate of contribution (Act 4). EPF contribution based on RM1500 (minimum wage) with total contribution of RM360 and not</li> </ol> |                     |                                   |

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|                               | <p>proportionate with August 2022 salary (RM4334.32). For SOCSO contribution, total of RM 32.60 (for RM 1400-1500 salary scale) was made and verified via Jadual Caruman 8A for August 2022.</p> <p>ii. Interview was made with JA Warisan Mekar Sdn Bhd representative during onsite stakeholder consultation on 26/10/2022. Based on his explanation, the basis of contribution is RM1500 regardless of total salary received per month.</p> <p>Jernih Estate<br/>No evidence of employment contract between H2R Oil and Gas Services (contract harvesting) and workers available for verification.</p>   |
| <b>Corrections:</b>           | <ol style="list-style-type: none"> <li>1. The company asks contractor to re-evaluate the method of payment of wages and allowances according to the proper conditions.</li> <li>2. Contractor informed to employee and they will make refund of the insufficient contribution.</li> <li>3. Amendment of the old version to a more detailed employment letter will be done for their employee. – Nantha Agency</li> <li>4. The main contractor (H2R Oil &amp; Gas Services) has instructed the sub-contractor (Siber Callysta Sales And Services) to issue a work agreement for the harvesting contract workers at Jernih Estate and the contractor must be make sure every each new worker have a work agreement. Then management not be allowed who workers didn't have work agreement to work at estate.</li> </ol> |
| <b>Root Cause Analysis:</b>   | <p>Gajah Mati Estate</p> <p>Previously, the contractor had a different misinterpreted understanding of the payment method of EPF and SOCSO contributions. However, the estate management will take measures to ensure that the contractor compiles with the contribution payment method accurately. This occurs due to lack on training and understanding on required regulation related EPF and SOCSO Contribution.</p> <p>Jernih Estate</p> <p>Misunderstanding between main contractor (H2R Oil &amp; Gas Services) and sub-contractor (Siber Callysta Sales And Services) on work agreement preparation. This occurs due to lack on training and understanding on required regulation related agreement preparation.</p>  |
| <b>Corrective Actions:</b>    | <p>To conduct special briefing among contractor and supplier regarding to the contribution EPF and SOCSO to give awareness and understanding for this matter. Regular meeting with all contractors as to ensure compliance of all payment method and contribution.</p> <p>The sub-contractor (Siber Callysta Sales And Services) to issue a work agreement for each contract employee and must keep a copy of it in the estate office for record and audit purpose.</p>   |
| <b>Assessment Conclusion:</b> | <p>The CAP submitted found adequate to address the non-conformity. The effectiveness of CAP implementation will be assessed during next assessment.</p>   |

| Non-conformity   |                   |                    |            |
|------------------|-------------------|--------------------|------------|
| <b>NCR Ref #</b> | 2266495-202210-N2 | <b>Issued Date</b> | 27/10/2022 |

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|--|---|---------------------|-----------------------------------|
| <b>Due Date</b>                                    | Next Assessment (Recertification)   | <b>Closure Date</b> | Next Assessment (Recertification) |
| <b>Indicator &amp; Category (Critical / Minor)</b> | 3.1.3 – Minor Non Conformity  |                     |                                   |
| <b>Statement of Nonconformity:</b>                 | Management review minutes of meeting was not available.   |                     |                                   |
| <b>Requirement Reference:</b>                      | The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.<br>- Minor compliance -  |                     |                                   |
| <b>Objective Evidence:</b>                         | Based on interview and email verification, Management review meeting was conducted on 15/09/2022 however, until the date of audit, there is no evidence of minutes of meeting were available. It was not in line with SOP Management Review Standard Operating Procedure dated 01/10/2022 Edition TDMP/01 Rev. TDMP-03/2022 Section Flow Chart: Propose Minutes Of Meeting And Submit to PAM for approval and Signature. Distribute minutes to Management Review Committee members and other relevant personnel.  |                     |                                   |
| <b>Corrections:</b>                                | The management review minute will be provided and available at estate / mill.   |                     |                                   |
| <b>Root Cause Analysis:</b>                        | The document related to management review was recorded and updated. However, for management review minute of meeting did not provided by PIC due to delayed of updated issue of matter arising in the meeting.  |                     |                                   |
| <b>Corrective Actions:</b>                         | To monitor the implementation of the SOP Management Review Standard Operating Procedure dated 01/10/2022 Edition TDMP/01 Rev. TDMP-03/2022 Section Flow Chart: through sustainability department. Management minute meeting need to be submitted to sustainability department within 14 days after the meetings. Sustainability department will provide reminder if the date line exceeded.<br><br>To conduct training to PIC on the SOP Management Review Standard Operating Procedure dated 01/10/2022 Edition TDMP/01 Rev. TDMP-03/2022 and to reassessed the effectiveness of the training. |                     |                                   |
| <b>Assessment Conclusion:</b>                      | The CAP submitted found adequate to address the non-conformity. The effectiveness of CAP implementation will be assessed during next assessment.  |                     |                                   |

| <b>Opportunity for Improvements</b> |                    |
|-------------------------------------|--------------------|
| <b>OFI #</b>                        | <b>Description</b> |
| <b>OFI 1</b>                        | N/A                |

| <b>Positive Findings</b> |   |
|--------------------------|---|
| <b>PF #</b>              | <b>Description</b>  |
| <b>PF 1</b>              | Good arrangement for audit visit and high commitment by Sustainability Department and units person in charge. |
| <b>PF 2</b>              | Good positive relationship maintained and highlighted by internal and external stakeholders                   |

**3.3.1 Status of Nonconformities Previously Identified and Observations**

| Non-conformity                                     |   |                     |            |
|--|---|---------------------|------------|
| <b>NCR Ref #</b>                                   | 2121147-202110-M1   | <b>Issued Date</b>  | 22/10/2021 |
| <b>Due Date</b>                                    | 22/01/2022  | <b>Closure Date</b> | 11/01/2022 |
| <b>Indicator &amp; Category (Critical / Minor)</b> | 6.7.3 – Critical Non-Conformity   |                     |            |
| <b>Statement of Nonconformity:</b>                 | The enforcement to ensure the usage of PPE is not effectively implemented   |                     |            |
| <b>Requirement Reference:</b>                      | (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.  |                     |            |
| <b>Objective Evidence:</b>                         | Noted during site visit at the mill loading ramp, sighted the lorry drivers from estate (Air Putih Estate and Pelantoh Estate) was not wearing safety helmet or appropriate safety equipment when opening the FFB loading BIN and when climbing the lorry to open safety net.   |                     |            |
| <b>Corrections:</b>                                | Estate and mill management have called all estate drivers for safety briefing and PPE wearing & awareness training at workplace on the 3rd of November 2021. Estate has also issued a memo to all drivers as a reminder of the importance of wearing the PPE at workplace.  |                     |            |
| <b>Root Cause Analysis:</b>                        | Personal Protective Equipment (PPE) such as safety helmet and shoes for all lorry and tractor drivers has been provided adequately every year or when necessary, along with wearing training at work place. However, awareness on proper use of PPE among workers and drivers still unsatisfactory due to training has not sufficient conducted following the COVID 19 pandemic involving residents, estate and mill workers recently and cause drivers negligence.   |                     |            |
| <b>Corrective Actions:</b>                         | PPE will be provided adequately and PPE wearing training will be conducted annually to all estate drivers.<br>Monitoring on use of PPE to all drivers and other workers will be conducted by estate and mill management involving estate/mill security personnel.   |                     |            |
| <b>Assessment Conclusion:</b>                      | <p>The operating units has issue internal memorandum to all FFB Transportation drivers (lorries and tractors) on instruction of compulsory to wear PPE when transporting FFB to the mill. Reviewed the internal memo as follows:</p> <ol style="list-style-type: none"> <li>1. Kemaman POM: Internal Memo no. P/MEMO/RSPO/001/2021 dated 25/10/2021</li> <li>2. Pelantoh Estate: Internal Memo no. LPT/RSPO/010 dated 25/10/2021</li> <li>3. Air Putih Estate: Internal Memo no. LAP.MEMO/RSPO/001 dated 01/11/2021</li> </ol> <p>The memorandum was displayed at the security post at the respective operating units. Noted during interview with the security guards, the understanding on the SOP's and memorandum was satisfactory. During the FFB transportation into the mill, the security guards will check the PPE for drivers before permitted to enter the mill premise.</p> <p>The operating units has conducted training to all personnel related to the FFB transportation on PPE awareness such as lorry driver, workshop operator and</p> |                     |            |

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|---|---|
|   | <p>security guards. Reviewed the training records such as training attendance and training material as follows:</p> <ol style="list-style-type: none"> <li>1. Kemamaman POM: FFB driver entry and exit procedure and PPE awareness and in the mill area dated 10/11/2021.</li> <li>2. Pelantoh Estate: Safety training - PPE awareness for FFB transportation to the mill dated 03/11/2021.</li> <li>3. Air Putih Estate: Safety training to lorry drivers dated 27/12/2021.</li> </ol> <p>The operating units has conducted training evaluation after all training conducted. The operating units monitored the PPE issued to the workers. Reviewed the PPE for issued as follows:</p> <p>Pelantoh Estate</p> <ol style="list-style-type: none"> <li>1. PT 00059</li> <li>2. PT00240</li> <li>3. PT1200713</li> <li>4. PT00148</li> <li>5. PT1701265</li> </ol> <p>Air Putih Estate</p> <ol style="list-style-type: none"> <li>1. AP0900493</li> <li>2. AP00110</li> <li>3. AP0900454</li> <li>4. AP2001455</li> <li>5. AP00104</li> </ol> <p>All the corrective action and evidence of implementation were found to be adequate. The Major NC closed on 11/01/2022.</p> |
| <b>Effectiveness Closure (for previous audit closed Critical NC):</b> | <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, TDMP-02/2021 dated 11/11/2021.</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 Harvesting 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>Latest Training record as below:</p> <ol style="list-style-type: none"> <li>1. Gajah Mati Estate - SOP &amp; PPE Tractor Driver dated 16/02/2022</li> <li>2. Kemaman POM - PPE Awareness Training dated 15/03/2022</li> <li>3. Jernih Estate - Personal Hearing Protection (PHP) dated 27/07/2022 and PPE Training dated 16/03/2022</li> </ol> <p>Hence the Major NC remained closed.</p>   |

| Non-conformity                                  |                              |                     |            |
|---|------------------------------|---------------------|------------|
| <b>NCR Ref #</b>                                | 2121147-202110-N1            | <b>Issued Date</b>  | 22/10/2021 |
| <b>Due Date</b>                                 | ASA 1_4                      | <b>Closure Date</b> | 27/10/2022 |
| <b>Clause &amp; Category (Critical / Minor)</b> | 6.7.2 – Minor Non-Conformity |                     |            |

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| <b>Statement of Nonconformity:</b> | The monitoring of First Aid Box item is not effectively implemented   |                                    |                         |                                    |                   |               |            |               |            |            |             |               |            |
|------------------------------------|---|------------------------------------|-------------------------|------------------------------------|-------------------|---------------|------------|---------------|------------|------------|-------------|---------------|------------|
| <b>Requirement Reference:</b>      | 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.   |                                    |                         |                                    |                   |               |            |               |            |            |             |               |            |
| <b>Objective Evidence:</b>         | Noted during site visit at the operating units, the item in the first aid box were inadequate as per listed in the First Aid Item List as follows:<br>1. Kemaman POM at FFB Ramp: Cotton and medicated oil<br>2. Pelantoh Estate at Harvesting Operation: Drop eye wash   |                                    |                         |                                    |                   |               |            |               |            |            |             |               |            |
| <b>Corrections:</b>                | Estate and mill management has called all first aid holders for training: The explanation on how to immediately inform the estate HA/management if the item in the box has been used and how to record it in the form given.  |                                    |                         |                                    |                   |               |            |               |            |            |             |               |            |
| <b>Root Cause Analysis:</b>        | Inspections of first aid boxes are carried out by the estate HA on a monthly basis. For October 2021, inspection was conducted on 17/10/2021 (Pelantoh estate) and 16/10/2021 (mill compound), all items in the box were inspected and added for less or missing items.<br><br>However, before auditing time, the items have been used by the workers and did not inform estate HA/ mill for the less of the item.  |                                    |                         |                                    |                   |               |            |               |            |            |             |               |            |
| <b>Corrective Actions:</b>         | SOP for first aid kit will be reviewed and revised to implement the communication flow between HA /Management and first aider. Also to include the regular checking to make sure all item in first aid kit are available. Inspection of the first aid will be conducted as usual by monthly basis including record of the type of item use, recipient's name, date and signature. To perform the refreshment training for first aider and related person.   |                                    |                         |                                    |                   |               |            |               |            |            |             |               |            |
| <b>Assessment Conclusion:</b>      | SOP on First Aid has been reviewed. Refer SOP Procedure of First Aid Management dated 01/10/2022 Edition TDM/01 Revision TDM-02/2022.<br><br>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:<br><table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Estate/ Mill</th> <th style="width: 33%;">First Aid Training date</th> <th style="width: 33%;">Latest First Aid Monitoring Record</th> </tr> </thead> <tbody> <tr> <td>Gajah Mati Estate</td> <td>23-24/03/2022</td> <td>07/10/2022</td> </tr> <tr> <td>Jernih Estate</td> <td>27/06/2022</td> <td>19/09/2022</td> </tr> <tr> <td>Kemaman POM</td> <td>23-24/03/2022</td> <td>20/09/2022</td> </tr> </tbody> </table><br>Hence the CAR received is accepted and concluded. | Estate/ Mill                       | First Aid Training date | Latest First Aid Monitoring Record | Gajah Mati Estate | 23-24/03/2022 | 07/10/2022 | Jernih Estate | 27/06/2022 | 19/09/2022 | Kemaman POM | 23-24/03/2022 | 20/09/2022 |
| Estate/ Mill                       | First Aid Training date   | Latest First Aid Monitoring Record |                         |                                    |                   |               |            |               |            |            |             |               |            |
| Gajah Mati Estate                  | 23-24/03/2022   | 07/10/2022                         |                         |                                    |                   |               |            |               |            |            |             |               |            |
| Jernih Estate                      | 27/06/2022  | 19/09/2022                         |                         |                                    |                   |               |            |               |            |            |             |               |            |
| Kemaman POM                        | 23-24/03/2022   | 20/09/2022                         |                         |                                    |                   |               |            |               |            |            |             |               |            |

| Non-conformity   |                   |                    |            |
|------------------|-------------------|--------------------|------------|
| <b>NCR Ref #</b> | 2121147-202110-N2 | <b>Issued Date</b> | 22/10/2021 |

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| <b>Due Date</b>                                 | ASA1_4  | <b>Closure Date</b> | 27/10/2022 |
| <b>Clause &amp; Category (Critical / Minor)</b> | 3.4.2 – Minor Non-Conformity  |                     |            |
| <b>Statement of Nonconformity:</b>              | The social management and monitoring plans developed was insufficiently included the participation of affected stakeholders.  |                     |            |
| <b>Requirement Reference:</b>                   | 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.  |                     |            |
| <b>Objective Evidence:</b>                      | Kemaman POM, Pelantoh Estate & Tebak Estate:<br>The Social Management Action Plan developed in all operating units that involved an online external stakeholder survey as well as internal stakeholders found insufficient to include potential and actual issues occurred related to foreign workers late work permit renewals and abscondment which potentially due to Covid-19 pandemic. |                     |            |
| <b>Corrections:</b>                             | Estate management have revised Social Management Action Plan in SEIA to resolve all issues related to late work permit renewal of foreign workers during MCO.   |                     |            |
| <b>Root Cause Analysis:</b>                     | During the movement Control Order (MCO) period the Estate operation especially harvesting process went on as usual as obtaining permission from the MITI.<br>Therefore during that period foreign workers whose permits have expired are also given permission to work while awaiting the extension process.  |                     |            |
| <b>Corrective Actions:</b>                      | Social Management Action Plan are to be updated and reviewed every time to curb the problem of late renewals of work permit.  |                     |            |
| <b>Assessment Conclusion:</b>                   | Specific component under legal permit included in the social management plan FY2022. Issues related to permit renewal incorporated in the management plan and verified at each visited operating units. Hence the CAR received is accepted and concluded.   |                     |            |

| Opportunity for Improvement |   |
|-----------------------------|---|
| OFI#                        | Description   |
| OFI 1                       | <b>OFI Statement:</b><br>N/A<br><br><b>Verification / Follow-up actions:</b><br>N/A |

**3.3.2 Summary of the Nonconformities and Status**

| CAR Ref.          | Category (Critical / Minor) | P&C Indicator | Issued Date | Status & Date (Closure)  |
|-------------------|-----------------------------|---------------|-------------|--------------------------|
| 1664201-201807 M1 | Major                       | 6.5.1         | 26/07/2018  | Closed out on 18/10/2018 |
| 1664201-201807 M2 | Major                       | 4.4.2         | 26/07/2018  | Closed out on 18/10/2018 |

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|                   |       |             |            |                          |
|-------------------|-------|-------------|------------|--------------------------|
| 1664201-201807 M3 | Major | 5.3.2       | 26/07/2018 | Closed out on 18/10/2018 |
| 1664201-201807 M4 | Major | SCCS 5.3.2  | 26/07/2018 | Closed out on 18/10/2018 |
| 1664201-201807 M5 | Major | SCCS 5.13.1 | 26/07/2018 | Closed out on 18/10/2018 |
| 1664201-201807 M6 | Major | SCCS 5.13.2 | 26/07/2018 | Closed out on 18/10/2018 |
| 1664201-201807 M7 | Major | SCCS 5.13.3 | 26/07/2018 | Closed out on 18/10/2018 |
| 1820535-201903 M1 | Major | 4.6.11      | 06/09/2019 | Closed out on 03/12/2019 |
| 1820535-201903 M2 | Major | 4.7.2       | 06/09/2019 | Closed out on 03/12/2019 |
| 1820535-201903 M3 | Major | 2.1.1       | 06/09/2019 | Closed out on 03/12/2019 |
| 1820535-201903 M4 | Major | 5.5.1       | 06/09/2019 | Closed out on 03/12/2019 |
| 1820535-201903 M5 | Major | SCCS D 5.1  | 06/09/2019 | Closed out on 03/12/2019 |
| 1820535-201903 M6 | Major | SCCS D 4.2  | 06/09/2019 | Closed out on 03/12/2019 |
| 1820535-201903 N1 | Minor | 5.6.3       | 06/09/2019 | Closed out on 02/09/2020 |
| 1820535-201903 N2 | Minor | 5.2.4       | 06/09/2019 | Closed out on 02/09/2020 |
| 1949922-202009-N1 | Minor | 2.2.2       | 04/09/2020 | Closed out on 22/10/2021 |
| 1949922-202009-N2 | Minor | 2.2.3       | 04/09/2020 | Closed out on 22/10/2021 |
| 1949922-202009-N3 | Minor | 3.1.3       | 04/09/2020 | Closed out on 22/10/2021 |
| 1949922-202009-N4 | Minor | 7.3.1       | 04/09/2020 | Closed out on 22/10/2021 |
| 1949922-202009-N5 | Minor | 4.2.3       | 04/09/2020 | Closed out on 22/10/2021 |
| 2121147-202110-M1 | Major | 6.7.3       | 22/10/2021 | Closed out on 11/01/2022 |
| 2121147-202110-N1 | Minor | 6.7.2       | 22/10/2021 | Closed out on 27/10/2022 |
| 2121147-202110-N2 | Minor | 3.4.2       | 22/10/2021 | Closed out on 27/10/2022 |
| 2266495-202210-M1 | Major | 3.6.2       | 27/10/2022 | Closed out on 26/12/2022 |
| 2266495-202210-M2 | Major | 6.1.2       | 27/10/2022 | Closed out on 26/12/2022 |
| 2266495-202210-N1 | Minor | 2.2.2       | 27/10/2022 | Open                     |
| 2266495-202210-N2 | Minor | 3.1.3       | 27/10/2022 | Open                     |

**3.4 Stakeholders and previous land owner / user consultation**

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Kemaman Palm Oil Mill 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.

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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.

| <b>Stakeholders contacted</b>  |  |   |
|--|--|---|
| <b>Type of Stakeholder</b> (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities) | <b>Stakeholder name / organization</b>   | <b>Means of communication</b> (e.g. face to face interview, email, phone interview, comment from public notice) |
| Internal   | Gender committee representative, union representative (NUPW), worker's representative by nationality | Face to face  |
| Contractor   | Chong Trading, Nantha Agency, JA Warisan Mekar   | Face to face  |
| Government department  | School representative, SK Padang Kubu  | Face to face  |
| Communities  | JPKK Sg Mas & Tebak  | Face to face  |
| Internal   | Gender committee representative, union representative (NUPW), worker's representative by nationality | Face to face  |

| <b>Stakeholders comment</b> |  |
|-----------------------------|--|
| <b>1</b>                    | <p><b>Feedbacks:</b><br/>Contractors &amp; suppliers (Chong Trading, Nantha Agency, JA Warisan Mekar)<br/>No pending payment issue raised by contractor. They were also aware on the code of business ethics with TDMP and the whistle-blowing policy which will protect them from any misconduct from the management.</p> <p><b>Audit Team verification and response:</b><br/>No further issue.</p>   |
| <b>2</b>                    | <p><b>Feedbacks:</b><br/>SK Padang Kubu<br/>Full support given by the estate management for any programme organized such as sports day and motivational talk for school children. TDMP management is always open for any request or assistance whenever required. One concern raised with regards to school children attendance has to be improved from time to time.</p> <p><b>Audit Team verification and response:</b><br/>Estate and mill management will continue to give awareness to workers to improve on absenteeism issue.</p> |
| <b>3</b>                    | <p><b>Feedbacks:</b><br/>Gender Representatives<br/>They are aware of the function of the committee and reported that there was no sexual harassment case reported. They were given equal opportunity to work in the company.</p> <p><b>Audit Team verification and response:</b><br/>No other issue.</p>  |

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|   |  |
|---|--|
| 4 | <p><b>Feedbacks:</b><br/>         Worker’s representative (Indonesia, Bangladesh)<br/>         No issue with the management and always opens for consultation and assistance. Equal opportunity to all workers regardless of their nationality, gender and race.</p> |
|   | <p><b>Audit Team verification and response:</b><br/>         No other issue.</p>   |
| 5 | <p><b>Feedbacks:</b><br/>         JPKK Sg Mas &amp; Tebak<br/>         Good feedback received from the village representative of JPKK Sg Mas and Tebak. No encroachment and overplanted issue occurred at the boundary of JPKK Sg Mas and Jernih Estate.</p>         |
|   | <p><b>Audit Team verification and response:</b><br/>         No other issue.</p>   |

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

| Previous land owner / user comment |   |
|------------------------------------|---|
|                                    | <p><b>Feedbacks:</b> Not applicable since all estates within SOU Kemaman belongs to the Terengganu State Government Incorporated Company that owns 100% stake in TDM.</p> |
|                                    | <p><b>Audit Team verification and response:</b> No further verification required.</p>   |

**3.5 Impartiality and conflict of interest**

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

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**Formal Signing-off of Assessment Conclusion and Recommendation**

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Kemaman Palm Oil Mill 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 Kemaman Palm Oil Mill is remain certified.

| Report prepared by   | Acceptance of Assessment Conclusion  |
|--|--|
| <b>Name:</b><br>NOR HALIS ABU ZAR  | <b>Name:</b> FIKRI BIN ISMAIL  |
| <b>Company Name:</b><br>BSI SERVICES MALAYSIA SDN BHD  | <b>Company Name:</b><br>TDM PLANTATION SDN BHD   |
| <b>Title:</b><br>CLIENT MANAGER  | <b>Title:</b> PLANTATION CONTROLLER<br>TDM PLANTATION SDN BHD<br>(A Member of TDM Berhad Group)<br>(Company No. 110679-W)  |
| <b>Signature:</b>  | <b>Signature:</b> <br>(HAJI FIKRI BIN ISMAIL)<br>PLANTATION CONTROLLER<br><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> |
| <b>Date:</b> 18/12/2022  | <b>Date:</b> 20.12.2022  |

**Appendix A: Summary of Findings**

| Criterion / Indicator   | Assessment Findings  | Compliance |
|---|--|------------|
| <b>Principle 1: Behave ethically and transparently</b>  |  |            |
| <b>Criterion 1.1:</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making. |  |            |
| 1.1.1   | <p><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Critical (Major) compliance -</p> <p>All documents are available at the operating sites and head office. There is no restriction reported by the stakeholders regarding obtaining of information or documents. The access of any relevant documentation is made available upon request. Procedure for communication which includes the information request is available at notice boards of the estates and mill. The company polices is made available at notice boards of the estates and mill vicinity</p> <p>Available a statement mentioning document readily available to public not limited to:</p> <ul style="list-style-type: none"> <li>• Land ownership title</li> <li>• OSH Plan</li> <li>• SIA Report</li> <li>• EIA Report</li> <li>• HCV report and related documentation</li> <li>• Continuous Improvement Plan</li> <li>• Pollution Prevention Plan</li> <li>• Environmental management/Monitoring Plan</li> <li>• Communication and Complaint/Grievance Procedure</li> <li>• Consultation Procedure</li> <li>• Human Right Policy</li> </ul> | Complied   |

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|                   |  | <ul style="list-style-type: none"> <li>Contributions to community development</li> </ul>   |             |                 |                   |           |             |           |               |           |          |
|-------------------|--|--|-------------|-----------------|-------------------|-----------|-------------|-----------|---------------|-----------|----------|
| 1.1.2             | <p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>   | <p>Communication Flowchart with Mill/ Estate Management was developed where it has clearly described the process of request of information/ report. Timeline to respond and solve is within 28 working days. The company has implemented Request and Response Form for the stakeholders. Information available in Bahasa Malaysia and English.</p>   | Complied    |                 |                   |           |             |           |               |           |          |
| 1.1.3             | <p><b>(C)</b> Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>   | <p>The company has implemented form for records of Communication with Stakeholders to record all the requests from the stakeholders. These records of information and responses are maintained at respective visited operating units.</p> <p>Log book used to record any request from stakeholders (internal and external). Most of it mainly on monetary contribution/donation request from neighbouring villages and schools. Other request from government department/agency was by official letter and responded officially by letter to the respective department. Other related information and responses reported in stakeholder meeting which has been carried out by each operating units on yearly basis. Issues discussed and recorded in the summary of meetings as the following:</p> <table border="1"> <thead> <tr> <th>Estate/mill</th> <th>Date of meeting</th> </tr> </thead> <tbody> <tr> <td>Gajah Mati Estate</td> <td>14/9/2022</td> </tr> <tr> <td>Kemaman POM</td> <td>11/4/2022</td> </tr> <tr> <td>Jernih Estate</td> <td>27/7/2022</td> </tr> </tbody> </table> | Estate/mill | Date of meeting | Gajah Mati Estate | 14/9/2022 | Kemaman POM | 11/4/2022 | Jernih Estate | 27/7/2022 | Complied |
| Estate/mill       | Date of meeting  |  |             |                 |                   |           |             |           |               |           |          |
| Gajah Mati Estate | 14/9/2022  |  |             |                 |                   |           |             |           |               |           |          |
| Kemaman POM       | 11/4/2022  |  |             |                 |                   |           |             |           |               |           |          |
| Jernih Estate     | 27/7/2022  |  |             |                 |                   |           |             |           |               |           |          |
| 1.1.4             | <p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p> | <p>Available a procedure in Gajah Mati and Jernih Estate named Communication with Mill/Estate documented. Similar procedure available at Kemaman POM. The format is in a flowchart form defining flow of the consultation and communication process. The information reported shall be rectify according to type of</p>  | Complied    |                 |                   |           |             |           |               |           |          |

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|--|--|---|----------|
|  |  | communication. E.g. Action within 28 days in the procedure. If further action request is involved Head Office, then the management will submit the request to Head Office for further approval and shall be rectified within 30 working day. All internal and external stakeholders were briefed on this procedure during stakeholder meeting as well as muster / rollcall meeting.                 |          |
| 1.1.5  | There is a current list of contact and details of stakeholders and their nominated representatives.<br>- Minor compliance -  | The current list of contact and details of stakeholders and their nominated representative was updated in the stakeholder list FY2022 at each operating unit. Verified the list which has included vendor/supplier, authority and other interested party – DOSH/DOE etc, school and local community head etc.   | Complied |
| <b>Criterion 1.2:</b> 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.<br>- Minor compliance - | Available Work Ethical Policy stating ethical issues, maintaining workers right in recruitment, selection of workers, contracts. The policy also sighted during site visit at notice board outside Office of Gajah Mati Estate, Jernih Estate and Kemaman POM. Sighted training attendance record during muster ground for Kemaman POM on notification of company policy to employee dated 17/5/22. | Complied |
| 1.2.2  | A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.<br>- Minor compliance -                     | Regular briefing on policies conducted to workers during morning muster, roll call and gatherings as mentioned above for internal stakeholders. Internal audit programme (ESH/RSPO/ESG) including supplier/ contractor’s due diligence declaration are used as a mechanism to monitor compliance and the implementation of the policy and overall ethical business practice.                        | Complied |
| <b>Principle 2: Operate legally and respect rights</b>   |  |   |          |
| <b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations. |  |   |          |
| 2.1.1  | <b>(C)</b> The Unit of Certification complies with legal requirements  | The operating units continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the   | Complied |

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|  | <p>- Critical (Major) compliance -</p> | <p>operating units and Sustainability Department. The operating units had obtained and renewed licenses and permits as required by the law. Among others the licenses/permit viewed were:</p> <p>Gajah Mati Estate</p> <ol style="list-style-type: none"> <li>1. MPOB license no. 502036302000, valid till 31/08/2023</li> <li>2. MPOB license for nursery no. 562823011000 valid till 30/06/2023</li> <li>3. Weighbridge calibration no. 692347 with safety ticker no. 2.1KQ029131</li> <li>4. Air compressor certificate of fitness no. PMT-TG/22 29688, valid till 21/05/2023</li> <li>5. Medical Assistant certificate no. 20480/2022, valid till 31/12/2022</li> </ol> <p>Kemaman POM</p> <ol style="list-style-type: none"> <li>1. MPOB license no. 500041904000 valid till 31/03/2023</li> <li>2. DOE license no. 004055 with compliance schedule no. AS(B)T:31/152/000/001 valid till 30/06/2023</li> <li>3. DOE contravene license no. 004082 with compliance license no. JPLP(UB)/2021/004082 valid till 31/12/2022</li> <li>4. Weighbridge calibration no. 596773 with safety ticker no. 2.1KQ029085</li> <li>5. Fire certificate no. 321859, valid till 05/07/2023</li> <li>6. Scheduled control goods permit for storage of diesel no. T001757 valid till 10/05/2024</li> <li>7. Private installation license no. 2021/02942 valid till 21/11/2022</li> <li>8. Water abstraction license no. PA (P) – A0012, valid till 31/12/2022</li> </ol> |  |
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|       |   | <p>9. Competent Person:</p> <ul style="list-style-type: none"> <li>• CePSWaM certificate no. CePSWaM/209338</li> <li>• CePPOME certificate no. CePPOME/00228</li> </ul> <p>Jernih Estate</p> <ol style="list-style-type: none"> <li>1. MPOB license no. 501868702000, valid till 31/10/2022. The renewal process was in progress. Reviewed the payment receipt to MPOB no. Ref2-00104966 dated 20/09/2022.</li> <li>2. Scheduled control goods permit for storage of diesel no. T001817 valid till 06/09/2024.</li> <li>3. Air compressor certificate of fitness no. PMT-TG/22 29181, valid till 10/04/2023.</li> <li>4. Estate Hospital Assistant certificate no. Q 2144</li> </ol>   |          |
| 2.1.2 | <p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p> | <p>The Legal and Secretarial Department will track any changes to the applicable legal and other requirements and update the Sustainability Team. The Sustainability Team will communicate the new update with operating units through memorandum, letter or emails.</p> <p>Reviewed the latest reviewed and updated Legal Requirement Register dated 18/10/2022. Among the latest updated was done as follows:</p> <ol style="list-style-type: none"> <li>1. Occupational Safety and Health (Noise Exposure) Regulations 2019</li> <li>2. Fire Services (Fire Certificate) (Amendment) Regulations 2020</li> <li>3. Fire Services (Designated Premises) (Amendment) Regulations 2020</li> <li>4. Minimum Wages Order 2022</li> <li>5. Workers Minimum Standard of Housing, Accommodations and Amenities Act 1990</li> </ol> | Complied |

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|       |  | <p>6. Water Services Industry (Desludging Services regulations 2021)</p> <p>The mill has appointed the Compliance Executive as person responsible for compliance legal and other requirement as per appointment letter dated 23/02/2021 signed by the Mill Manager. Refer letter no. TDMP/LRR/001/2021.</p> <p>The estates has appointed the Asst. Manager as person responsible for compliance legal and other requirement as per appointment letter dated 01/08/2022. Refer appointment letter with ref no. LJN.RSPO/MSPO/2022.</p>        |                |
| 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 boundary for operating units were clearly demarcated.</p> <p>Kemaman Palm Oil Mill:<br/>Kemaman Palm Oil Mill is located in Pelantoh Estate area. The mill area was demarcated with fences.</p> <p>Gajah Mati Estate:<br/>Legal boundary was clearly demarcated with security trenches and red pole as sighted during site visit at field PR 20A adjacent with Ladang Rakyat Terengganu.</p> <p>Jerneh Estate:<br/>Legal boundary was clearly demarcated with red pole as sighted at field PM 08B/1T adjacent with Kg. Sg. Mas.</p> | Complied       |
|       |  |  |                |
| 2.2.1 | <p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>   | <p>List of contracted parties were made available for verification at visited OU and incorporated in FY2022 stakeholder list.</p>  | Complied       |
| 2.2.2 | <p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p>              | <p>Sampled contract @ "<i>perjanjian pesanan kerja/PPK</i>" between Jernih Estate and H2R Oil and Gas Services Sdn Bhd dated 7/2/22 and valid until 28/2/22, ref. no. JN003/22 issued on monthly basis.</p> <p>Other samples of PPK were sighted at Gajah Mati Estate as per below:</p>  | Non-compliance |

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| <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p> | <ol style="list-style-type: none"> <li>1. Contractor – Nantah Agency, ref. no.: LGM 095/22 dated 1/7/2022. Contract validity from 1/7/22 – 31/12/2022.</li> <li>2. Contractor – Ibrahim Lim Eng Poo, ref. no. LGM 089/22 dated 1/7/2022. Contract validity from 1/7/22 – 31/12/2022.</li> <li>3. Contractor – JA Warisan Mekar Sdn Bhd, ref LGM 096/22 dated 1/7/2022. Contract validity from 1/7/22 – 31/12/2022.</li> </ol> <p>Kemaman POM engaged 3<sup>rd</sup> party contractor to transport CPO and PK to buyer. Specific clauses on meeting applicable legal requirements included in the contract, ref: TDMP/OD/09/01.32 dated 13/9/2022. The contract still in the process of renewal and expired by 31/10/2022.</p> <p>Evidence of legal due diligence of all contracted third parties were not effectively demonstrated.</p> <p>Gajah Mati Estate</p> <p>Employment letter dated 1/1/22 between Nantha Agency and employee with ID:6?# #3*-11-\$27 has not included pertinent terms and conditions as per Employment Act 1959. No details of employee's entitlement (i.e rest day, annual leave, sick leave) in the employment contract. Further check on the salary voucher dated 6/9/2022 (August 2022 wage month), no EIS contribution in the pay slip. Contribution for EPF and SOCSO were not in accordance with monthly contribution rate (third schedule for EPF) and rate of contribution (Act 4).</p> <p>JA Warisan Mekar Sdn Bhd employee's ID: &amp;*#@17-11-\$99 pay slip checked:</p> <ol style="list-style-type: none"> <li>1. EIS and SOCSO contribution was not in accordance with monthly contribution rate (third schedule for EPF) and rate of contribution (Act 4). EPF contribution based on RM1500 (minimum wage) with total contribution of RM360 and not proportionate with August 2022 salary (RM4334.32). For SOCSO contribution, total of RM</li> </ol> |  |
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|   |  | <p>32.60 (for RM 1400-1500 salary scale) was made and verified via Jadual Caruman 8A for August 2022.</p> <p>2. Interview was made with JA Warisan Mekar Sdn Bhd representative during onsite stakeholder consultation on 26/10/2022. Based on his explanation, the basis of contribution is RM1500 regardless of total salary received per month.</p> <p>Jernih Estate</p> <p>No evidence of employment contract between H2R Oil and Gas Services (contract harvesting) and workers available for verification. Thus, a minor NC was raised.</p>  |          |
| 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>Under para 4 of the signed contract @ "<i>perjanjian pesanan kerja/PPK</i>" stated the commitment not to employ children or young person, force labour or trafficked labour. This was explicitly available in all contract @ "<i>perjanjian pesanan kerja/PPK</i>" sampled as reported under 2.2.2.</p>   | Complied |
| <b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources. |  |  |          |
| 2.3.1   | <p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p> | <p>Kemaman Palm Oil Mill received only crop from the TDM Plantation Estates and its own supply bases within the certification scope, or other if any are diversion from the sister mills (RSPO Certified) as results of breakdown or annual maintenance.</p> <p>All the estates from the same certification scope possessed the following information sighted and verified during the audit</p> <ol style="list-style-type: none"> <li>1. All FFB from the supply base estates supported by the delivery documents and weighbridge tickets.</li> <li>2. Valid land title with ownership status (refer indicator 4.4.1)</li> <li>3. Valid MPOB licence</li> </ol> | Complied |

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| 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>Kemaman Palm Oil Mill received only crop from the TDM Plantation Estates and its own supply bases within the certification scope, or other if any are diversion from the sister mills (RSPO Certified) as results of breakdown or annual maintenance.</p>  | Complied |
| <p><b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b></p>   |  |   |          |
| <p><b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.</p> |  |   |          |
| 3.1.1   | <p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p> | <p>TDM Plantation Sdn Bhd 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. The business plan for estate were covered on:</p> <p>Gajah Mati Estate and Jernih Estate continued to commit to long term economic and financial viability. The annual budgets for 2022 and Business Plan for 2023-2027 were verified. The budget covers activities for upkeep, cultivation, harvesting &amp; evacuation, welfare, capital expenditure, RSPO compliance etc. The budget also included projections on yield/ha, and total cost of production per m ton, per ha and CAPEX - capital expenditure mainly for buildings, furniture and others asset related expenses.</p> <p>Similarly, the mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning. The business plan among others contains.</p> <ol style="list-style-type: none"> <li>1. FFB Processing &amp; CPO/CPK production forecast</li> <li>2. Extraction Ratios – OER / KER,</li> <li>3. Cost of production</li> </ol> | Complied |

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| <p>3.1.2</p>       | <p>An annual replanting programme projected for a minimum of five years with yearly review, is available.<br/>         - Minor compliance -</p>                                   | <p>A long-range replanting programme projected for the minimum of 5 years was made available for review. Refer to replanting programme subject to annual review.</p> <table border="1" data-bbox="1137 475 1928 826"> <thead> <tr> <th rowspan="2">Year of Replanting</th> <th colspan="2">Estate / Replanting Ha</th> </tr> <tr> <th>Gajah Mati Estate</th> <th>Jernih Estate</th> </tr> </thead> <tbody> <tr> <td>2023</td> <td>182.48</td> <td>223.50</td> </tr> <tr> <td>2024</td> <td>0</td> <td>0</td> </tr> <tr> <td>2025</td> <td>0</td> <td>0</td> </tr> <tr> <td>2026</td> <td>106.78</td> <td>0</td> </tr> <tr> <td>2027</td> <td>0</td> <td>241.82</td> </tr> </tbody> </table>  | Year of Replanting    | Estate / Replanting Ha |  | Gajah Mati Estate | Jernih Estate | 2023 | 182.48 | 223.50 | 2024 | 0 | 0 | 2025 | 0 | 0 | 2026 | 106.78 | 0 | 2027 | 0 | 241.82 | <p>Complied</p> |
|--------------------|---|--|-----------------------|------------------------|--|-------------------|---------------|------|--------|--------|------|---|---|------|---|---|------|--------|---|------|---|--------|-----------------|
| Year of Replanting | Estate / Replanting Ha  |  |                       |                        |  |                   |               |      |        |        |      |   |   |      |   |   |      |        |   |      |   |        |                 |
|                    | Gajah Mati Estate   | Jernih Estate  |                       |                        |  |                   |               |      |        |        |      |   |   |      |   |   |      |        |   |      |   |        |                 |
| 2023               | 182.48  | 223.50   |                       |                        |  |                   |               |      |        |        |      |   |   |      |   |   |      |        |   |      |   |        |                 |
| 2024               | 0   | 0  |                       |                        |  |                   |               |      |        |        |      |   |   |      |   |   |      |        |   |      |   |        |                 |
| 2025               | 0   | 0  |                       |                        |  |                   |               |      |        |        |      |   |   |      |   |   |      |        |   |      |   |        |                 |
| 2026               | 106.78  | 0  |                       |                        |  |                   |               |      |        |        |      |   |   |      |   |   |      |        |   |      |   |        |                 |
| 2027               | 0   | 241.82   |                       |                        |  |                   |               |      |        |        |      |   |   |      |   |   |      |        |   |      |   |        |                 |
| <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.<br/>         - Minor compliance -</p> | <p>Management Review Meeting was guided by SOP Management Review Meeting dated 01/12/2021 Edition TDMP/01 Rev. TDMP-01/2021. Management review was conducted on annually basis by Operating Unit as per SOP established. Latest management review meeting was conducted on 15/09/2022 at HQ Level.</p> <p>Management review minutes of meeting was not available. Based on interview and email verification, Management review meeting was conducted on 15/09/2022 however, until the date of audit, there is no evidence of minutes of meeting were available. It was not in line with SOP Management Review Standard Operating Procedure dated 01/10/2022 Edition TDMP/01 Rev. TDMP-03/2022 Section Flow Chart: Propose Minutes Of Meeting And Submit to PAM for approval and Signature. Distribute minutes to Management Review Committee members and other relevant personnel. Thus, Minor NC was raised</p> | <p>Non-compliance</p> |                        |  |                   |               |      |        |        |      |   |   |      |   |   |      |        |   |      |   |        |                 |

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| <p><b>Criterion 3.2:</b> The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p> |   |   |
| <p>3.2.1</p>  | <p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p> | <p>The continuous improvement plan documented for environmental and social impacts and opportunities by each operating units. Sampled of continuous improvement plan for 2022 verified as per below:</p> <p>Palm Oil Mill</p> <ol style="list-style-type: none"> <li>1. To prevent the leakage of kernel oil from bunker, the mill has placed oil tray under the bunker.</li> <li>2. The estate avoid any leachate come from EFB, the mill has in progress to build new EFB dumping site. The tender has been awarded as per Letter of Award no. TDMP 27/22 dated 14/09/2022.</li> <li>3. To the greenhouse gases release by the methane gas, the mill has completed the construction of Biogas Plant. The initial operation date test was held on 27/01/2022 and the agreement has been signed with TNB.</li> </ol> <p>Estates</p> <ol style="list-style-type: none"> <li>1. To optimize water usage, the estates has placed water containers for rain harvesting at places such as workshop and stores. The rain water harvested were used to water plant, washing tractors and chemical mixing.</li> <li>2. The estates collect waste water from premixing area in collection tank. The water were recycle and reused back for chemical premix.</li> <li>3. To optimize the usage of chemical for rat control, the estates has placed 242 barn owl box in the estates. The barn owl box at ratio of 1:8.0 ha.</li> </ol> |
|   |   | <p>Complied</p>   |

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|  |   | <p>4. The estates has established nursery for beneficial plant such as <i>Turnera subulata</i>, <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>. The beneficial plant was planted along the main road as sighted at the sampled estates.</p> <p>5. To ease the workers to report any Unsafe Condition and Unsafe Act, the certification units has place forms and box at designated place such as at the post guard and office.</p> <p>6. The estate contribute water filter for the workers and placed at the Masjid, Jerneh Estate.</p> |          |
| 3.2.2  | <p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p><b>PROCEDURAL NOTE:</b><br/>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.<br/>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p> | <p>RSPO metrics template submitted to the auditors. The data was checked and verified its data to be reflective of the raw data sources.</p>  | Complied |
| <b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored. |   |   |          |
| 3.3.1  | <p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>   | <p>Standard Operating Procedure has been developed for the Mill and Estate for guidance in all operation conducted in the site.</p> <p>Sample of Mill SOP were listed below:</p> <ol style="list-style-type: none"> <li>1. Weighbridge dated 01/05/2011</li> <li>2. Threshing Station dated 01/05/2011</li> <li>3. Boiler Station dated 01/05/2011</li> <li>4. Water Sampling dated 01/05/2022</li> </ol>   | Complied |

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|       |   | <p>5. Safety and Security Practice dated 01/05/2022</p> <p>Sample of the Estate SOP were listed below:</p> <ol style="list-style-type: none"> <li>1. Procedure of First Aid Management dated 01/10/2022</li> <li>2. Supply Chain SOP – IP &amp; MB Module dated 01/01/2022</li> <li>3. Schedule Waste Revision Nov 2021</li> <li>4. Working at Height dated Nov 2020</li> <li>5. Permit To Work Revision Nov 2020</li> </ol> <p>The Manuals are also kept in the administration office to facilitate reference by any interested parties. The procedures were communicated to workers through training and infield supervision. Site inspection and interview with workers confirmed that the SOPs had been implemented and the employees understood the requirements of the SOPs.</p> |          |
| 3.3.2 | A mechanism to check consistent implementation of procedures is in place.<br>- Minor Compliance - | 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, Plantation Controller, Agronomist visit and Internal Audit.  | Complied |
| 3.3.3 | Records of monitoring and any actions taken are maintained and available.<br>- Minor Compliance - | <p>Operating units audited maintained all records of monitoring and available for review. There are several levels of records beginning from the field/mill supervisors to executives and the Managers. The Plantation Controller (PC) are accountable to monitor the estates compliance towards the SOP, Budget and Productivity among others. Estates / Mill performances are reviewed during the monthly meeting with PC/CE/CEO. Refer sample of monitoring report as below:</p> <p><u>Gajah Mati Estate</u></p> <ol style="list-style-type: none"> <li>1. Internal Audit report dated 04/08/2022</li> </ol>  | Complied |

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|  |   | <p>2. Plantation Advisory Report dated 03/05/2018<br/> <u>Jernih Estate</u></p> <p>1. Internal Audit Report dated 14/08/2022</p> <p>2. Plantation Advisory Report dated 12-13/09/2022<br/> <u>Kemaman POM</u></p> <p>1. Internal Audit Report dated 02/08/2022</p>   |                 |
| <p><b>Criterion 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p> |   |  |                 |
| <p>3.4.1</p>   | <p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p> | <p>There are no new plantings or new operations within the Kemaman POM certification unit. Nevertheless, the management unit has carried out a reassessment Social Impact Assessment for TDM Plantation Sdn Bhd for Bukit Besi Complex in June 2022. The assessment was done by external consultant under Green Orbis Environment Sdn Bhd from 12/6/22 to 15/6/22. 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. The report includes both positive and negative impact and its recommendation.</p> <p>The operating units has conducted environmental aspect and impacts analysis of all operations as per SOP established and documented in Standard Operating Procedure – Environmental Aspects/Impacts Evaluation date 01/11/2017, edition TDMP/01 rev. TDMP – 01/2017.</p> <p>The management review the environmental aspects impacts on annually basis or if there is changes in the legal or mill operation.</p> | <p>Complied</p> |

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|                   |  | Latest review on the environmental aspect impact was conducted January 2022   |             |                |             |            |             |            |                   |           |          |
|-------------------|--|---|-------------|----------------|-------------|------------|-------------|------------|-------------------|-----------|----------|
| 3.4.2             | 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.<br>- Minor Compliance - | <p>Social management plan has been reviewed for all operating units on annual basis. SIA management plan sighted as the following:</p> <table border="1" style="width: 100%;"> <thead> <tr> <th>Estate/Mill</th> <th>Date of review</th> </tr> </thead> <tbody> <tr> <td>Sg Tong POM</td> <td>20/10/2021</td> </tr> <tr> <td>Jaya Estate</td> <td>14/10/2021</td> </tr> <tr> <td>Pinang Mas Estate</td> <td>1/10/2021</td> </tr> </tbody> </table> <p>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.</p> <p>The operating units have established the Environmental Management Plan base on the Environmental Risk Assessment conducted. The management plan was reviewed on annually basis during Environmental Risk Assessment Review.</p> | Estate/Mill | Date of review | Sg Tong POM | 20/10/2021 | Jaya Estate | 14/10/2021 | Pinang Mas Estate | 1/10/2021 | Complied |
| Estate/Mill       | Date of review   |   |             |                |             |            |             |            |                   |           |          |
| Sg Tong POM       | 20/10/2021   |   |             |                |             |            |             |            |                   |           |          |
| Jaya Estate       | 14/10/2021   |   |             |                |             |            |             |            |                   |           |          |
| Pinang Mas Estate | 1/10/2021  |   |             |                |             |            |             |            |                   |           |          |
| 3.4.3             | <b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.<br>- Critical (Major) compliance -                         | <p>The social management plan was implemented, reviewed and updated on yearly basis in the participatory way by collected feedbacks during meeting with stakeholders. Seen the Social Management Plan 2022 in both mill and estate where the issues captured in the stakeholder meeting, Union/NUPW meeting, gender committee meeting were included. Review and monitoring plan updating reported as per indicator 3.4.2</p> <p>The operating units have established the Environmental Management Plan base on the Environmental Risk Assessment conducted. Reviewed the implementation of the management plan as follows:</p>  | Complied    |                |             |            |             |            |                   |           |          |

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|  |  | <ol style="list-style-type: none"> <li>1. To prevent the leakage of kernel oil from bunker, the mill has placed oil tray under the bunker.</li> <li>2. The estate avoid any leachate come from EFB, the mill has in progress to build new EFB dumping site. The tender has been awarded as per Letter of Award no. TDMP 27/22 dated 14/09/2022.</li> <li>3. To the greenhouse gases release by the methane gas, the mill has completed the construction of Biogas Plant. The initial operation date test was held on 27/01/2022 and the agreement has been signed with TNB.</li> <li>4. To optimize water usage, the estates has placed water containers for rain harvesting at places such as workshop and stores. The rain water harvested were used to water plant, washing tractors and chemical mixing.</li> <li>5. The estates collect waste water from premixing area in collection tank. The water were recycle and reused back for chemical premix.</li> <li>6. To optimize the usage of chemical for rat control, the estates has placed 242 barn owl box in the estates. The barn owl box at ratio of 1:8.0 ha.</li> <li>7. The estates has established nursery for beneficial plant such as <i>Turnera subulata</i>, <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>. The beneficial plant was planted along the main road as sighted at the sampled estates.</li> <li>8. To ensure no leachate from bio compost application flow into natural river, the estate has stop application of bio compost during rainy season and the application was done at area far from natural river as sighted at field PM 05A/1T of Jerneh Estate</li> </ol> |  |
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**Criterion 3.5:** A system for managing human resources is in place.

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| 3.5.1  | <p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p> | <p>TDM Plantation Sdn Bhd has an SOP for recruitment of mill and estates. SOP named "<i>Pengurusan Tenaga Kerja Tamu</i>", TDMP/SOP-OD/01 dated 1<sup>st</sup> March 2019. SOP for local workers (mill and estates) documented under "Prosedur Perlantikan Pekerja Ladang and Kilang", TDMP/SMP/3/01.01 dated 2<sup>nd</sup> November 2016.</p> <p>The SOP specifies that recruitment, selection and hiring process involves vetting and interviews, and must be medically fit. Promotions are at the sole discretion of the Company. Retirement age is fixed at 60 for local and termination of employment can be given mutually subject to the terms of the employment contract and Employment Act 1955.</p> <p>For foreign workers, or guest workers, the SOP for recruitment, hiring involves interview, selection based on age, qualification, and agricultural experience. Retirement and termination are as per Employment Act 1955 and employment contracts. For example, latest briefing with regards to recruitment procedure was carried out on 17/05/2022 at Kemaman POM.</p> | Complied |
| 3.5.2  | <p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>   | <p>Based on the personal files sighted for local and foreign workers, the employment procedures are being implemented and all records such as job application forms, medical records and employment contract.</p>   | Complied |
| <p><b>Criterion 3.6:</b> An occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p> |   |   |          |
| 3.6.1  | <p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>   | <p>TDM Plantation Sdn Bhd has established the SOP for risk assessment to identify H&amp;S issue documented in the Standard Operating Procedure (HIRARC) edition TDMP/01, rev. no. TDMP-02/2018 dated 22/10/2018.</p> <p>The risk assessment process has been describe in the SOP accordingly. As per SOP, HIRARC review to be conducted as follows:</p> <ol style="list-style-type: none"> <li>1. At least once a year</li> </ol>   | Complied |

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|                   |   | <ol style="list-style-type: none"> <li>2. Immediately whenever there is an accident, near miss or dangerous occurrence</li> <li>3. When there is changes in the work method</li> <li>4. When new machines and technology are introduced</li> <li>5. When there is new activity, process or operations</li> </ol> <p>The mill and estates have conducted assessment for risk on all the operations and documented in Hazard Identification, Risk Assessment, and Risk Control (HIRARC) and chemical Hazard Risk Assessment. The assessment cover all main operations and support operations. Sample of latest HIRARC tabulated in the table below:</p> <table border="1" data-bbox="1151 724 1921 1125"> <thead> <tr> <th>Operating Unit</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Kemaman POM</td> <td>Workshop – Mechanical dated 01/02/2022<br/>Laboratory dated 01/02/2022</td> </tr> <tr> <td>Gajah Mati Estate</td> <td>Cleaning Oil Trap dated 20/10/2022<br/>Roadside Pruning dated 20/10/2022<br/>Welding Workshop dated 20/10/2022</td> </tr> <tr> <td>Jernih Estate</td> <td>Ramp dated 05/09/2022<br/>Harvesting dated 05/09/2022<br/>Road Grading dated 05/09/2022</td> </tr> </tbody> </table> | Operating Unit        | Date | Kemaman POM | Workshop – Mechanical dated 01/02/2022<br>Laboratory dated 01/02/2022 | Gajah Mati Estate | Cleaning Oil Trap dated 20/10/2022<br>Roadside Pruning dated 20/10/2022<br>Welding Workshop dated 20/10/2022 | Jernih Estate | Ramp dated 05/09/2022<br>Harvesting dated 05/09/2022<br>Road Grading dated 05/09/2022 |  |
|-------------------|---|--|-----------------------|------|-------------|---|-------------------|--|---------------|---|--|
| Operating Unit    | Date  |  |                       |      |             |   |                   |  |               |   |  |
| Kemaman POM       | Workshop – Mechanical dated 01/02/2022<br>Laboratory dated 01/02/2022   |  |                       |      |             |   |                   |  |               |   |  |
| Gajah Mati Estate | Cleaning Oil Trap dated 20/10/2022<br>Roadside Pruning dated 20/10/2022<br>Welding Workshop dated 20/10/2022  |  |                       |      |             |   |                   |  |               |   |  |
| Jernih Estate     | Ramp dated 05/09/2022<br>Harvesting dated 05/09/2022<br>Road Grading dated 05/09/2022   |  |                       |      |             |   |                   |  |               |   |  |
| 3.6.2             | <p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.<br/>         - Critical (Major) compliance -</p> | <p>The mill and estate has 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>Non-compliance</p> |      |             |   |                   |  |               |   |  |

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|  |  | <p><u>Gajah Mati Estate</u></p> <ol style="list-style-type: none"> <li>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 12/12/2017 by Occumed Consultancy &amp; Services Sdn Bhd. Re Assessment of CHRA has been conducted on 13/09/2022 by Occumed Consultancy &amp; Services Sdn Bhd and report was yet to received.</li> <li>2. Medical Surveillance was conducted by Klinik Medic Bestari Paka on 16/07, 07/08, and 29/08/2022 for 20 workers those deemed to be exposed to Chemicals and Fumes. 2 workers were retest on 13/10/2022 and report were yet to receive.</li> <li>3. Noise Risk Assessment has been conducted at Gajah Mati Estate on 30/08/2020 by Noise Risk Assessor, Irwan Bin Jaapar (JKKP Registration No.: HQ/06/PEB/00/69). The NRA Report (R-NE-20-TDMLGM-10) was available for verification.</li> <li>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 04/12/2021 by Klinik Bestari Sdn Bhd. A total of 18 workers were tested and the results showed that 7 workers have normal hearing, 11 workers have hearing loss, 9 workers fall under NIHL Pattern, 2 workers fall under Non NIHL pattern, and no workers fall under Standard Threshold Shift (STS). Next audiometric test has been proposed to conduct on November 2022.</li> <li>5. Workplace inspection has been conducted on quarterly basis and all the findings were discussed in the Quarterly OSH Meeting. Refer Quarter 4 workplace inspection that has been conducted on 17/10/2022 at Workshop and Fertilizer Store dated 06/09/2022 .</li> </ol> |  |
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|  |  | <p><u>Kemaman POM</u></p> <ol style="list-style-type: none"> <li>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 12/07/2020 by OOS Venture Sdn Bhd.</li> <li>2. Medical Surveillance was conducted by Klinik Nabilah on 25/05, 26/05 and 28/05/2022 for 15 workers those deemed to be exposed to Chemicals and Manganese and result indicates that all workers were have normal results.</li> <li>3. The mill conducted LEV monitoring. Refer report Annual Inspection, Testing and Examination FY2022 dated 25/04/2022 by ZABSI Industrial Ventilation.</li> <li>4. Noise Risk Assessment has been conducted at Kemaman POM on 15/03/2020 by Noise Risk Assessor, Mohd Hazry Yusof (JKKP Registration No.: HQ/09/PEB/00/97). The NRA Report was available for verification.</li> <li>5. Audiometric Test was conducted for workers exposed to excessive noise in the estate based on the NRA recommendations. The test have been conducted on 03-08/08/2022 by IBRA OCCUHEALTH MOBILE Sdn Bhd. A total of 61 workers were tested and the results showed that 18 workers have normal hearing, 41 workers have hearing loss, 18 workers fall under NIHL Pattern, 13 workers fall under Non NIHL pattern, and 13 workers fall under Standard Threshold Shift (STS). Repeat test has been conducted on 18/10/2022 and report yet to receive.</li> <li>6. Workplace inspection has been conducted on quarterly basis and all the findings were discussed in the Quarterly OSH Meeting. Refer Quarter 4 workplace inspection that has been conducted on 24/10/2022 at Emergency Shower Area.</li> </ol> |  |
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|  |  | <p><u>Jernih Estate</u></p> <ol style="list-style-type: none"> <li>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 26/05/2021 by Occumed Consultancy &amp; Services Sdn Bhd.</li> <li>2. Medical Surveillance was conducted by Klinik Medic Bestari Paka on 07-08/06/2022 for 13 workers those deemed to be exposed to Chemicals. Report indicates that all workers were fit to work and continue with annual medical surveillance.</li> <li>3. Noise Risk Assessment has been conducted at Jernih Estate on 24/08/2020 by Noise Risk Assessor, Irwan Bin Jaapar (JKKP Registration No.: HQ/06/PEB/00/69). The NRA Report (R-NE-20-TDMLGM-10) was available for verification.</li> <li>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 03/10/2022 by Poliklinik Ibnu Sina Sdn Bhd. A total of 16 workers were tested and the results showed that 5 workers have normal hearing, 4 workers have hearing loss, 2 workers fall under NIHL Pattern, 2 workers fall under Non NIHL pattern, and 3 workers fall under Standard Threshold Shift (STS). Next audiometric test has been proposed to conduct on November 2022.</li> <li>5. Workplace inspection has been conducted on quarterly basis and all the findings were discussed in the Quarterly OSH Meeting. Refer October workplace inspection that has been conducted at Premix Area.</li> </ol> <p>H&amp;S Plan to addressed the risks to people not fully demonstrated.</p> <p>During site inspection at workshop Kemaman POM, Workshop area, it was found that Petrol were store in the container without any</p> |  |
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|   |   | <p>labelled. It was not in line with CHRA Recommendation Section 5.2 and 7.0 USECHH Labelling and Relabelling (USECHH 2000, Regulation 20 &amp; 21), (3) 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 and SOP Chemical Management dated 01/09/2022 Section 4.0 Procedures For handling (c) Ensure that the container is properly label, not damaged and no spillage during handling. Thus, major NC was raised.</p>  |          |
| <b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained. |   |  |          |
| 3.7.1   | <p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&amp;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 certification units were to assess understanding of participants include:</p> <ul style="list-style-type: none"> <li>• Participants completing post-training evaluation/feedback form and give suggestions;</li> <li>• Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended.</li> </ul> <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> | Complied |

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| <p>3.7.2</p>                                | <p>Records of training are maintained.<br/>         - Minor Compliance -</p> | <p>The operating units maintained the training records conducted. Reviewed the training records as follows:</p> <p><u>Gajah Mati Estate</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>First Aid Training</td> <td>23-24/03/2022</td> </tr> <tr> <td>Replanting Training</td> <td>15/05/2022</td> </tr> <tr> <td>Rat Baiting Training</td> <td>20/09/2022</td> </tr> <tr> <td>SOP Manuring Training</td> <td>14/06/2022</td> </tr> <tr> <td>Fire Drill Training</td> <td>14/03/2022</td> </tr> <tr> <td>SOP &amp; PPE Tractor Driver</td> <td>16/02/2022</td> </tr> <tr> <td>HIRARC Noise NRA</td> <td>30/10/2022</td> </tr> <tr> <td>Integrated Pest Management</td> <td>10/10/2021</td> </tr> </tbody> </table> <p><u>Kemaman POM</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>NRA Awareness Training</td> <td>27/01/2022</td> </tr> <tr> <td>First Aid Training</td> <td>23-24/03/2022</td> </tr> <tr> <td>Shovel Safety Training</td> <td>01/06/2022</td> </tr> <tr> <td>Fire Drill Training</td> <td>13/06/2022</td> </tr> <tr> <td>PPE Awareness Training</td> <td>15/03/2022</td> </tr> <tr> <td>CPR Training</td> <td>19/10/2022</td> </tr> <tr> <td>Spillage Kit and Chemical Handling Training</td> <td>18/10/2022</td> </tr> </tbody> </table> | Training | Date | First Aid Training | 23-24/03/2022 | Replanting Training | 15/05/2022 | Rat Baiting Training | 20/09/2022 | SOP Manuring Training | 14/06/2022 | Fire Drill Training | 14/03/2022 | SOP & PPE Tractor Driver | 16/02/2022 | HIRARC Noise NRA | 30/10/2022 | Integrated Pest Management | 10/10/2021 | Training | Date | NRA Awareness Training | 27/01/2022 | First Aid Training | 23-24/03/2022 | Shovel Safety Training | 01/06/2022 | Fire Drill Training | 13/06/2022 | PPE Awareness Training | 15/03/2022 | CPR Training | 19/10/2022 | Spillage Kit and Chemical Handling Training | 18/10/2022 | <p>Complied</p> |
|---|--|---|----------|------|--------------------|---------------|---------------------|------------|----------------------|------------|-----------------------|------------|---------------------|------------|--------------------------|------------|------------------|------------|----------------------------|------------|----------|------|------------------------|------------|--------------------|---------------|------------------------|------------|---------------------|------------|------------------------|------------|--------------|------------|---|------------|-----------------|
| Training                                    | Date   |   |          |      |                    |               |                     |            |                      |            |                       |            |                     |            |                          |            |                  |            |                            |            |          |      |                        |            |                    |               |                        |            |                     |            |                        |            |              |            |   |            |                 |
| First Aid Training                          | 23-24/03/2022  |   |          |      |                    |               |                     |            |                      |            |                       |            |                     |            |                          |            |                  |            |                            |            |          |      |                        |            |                    |               |                        |            |                     |            |                        |            |              |            |   |            |                 |
| Replanting Training                         | 15/05/2022   |   |          |      |                    |               |                     |            |                      |            |                       |            |                     |            |                          |            |                  |            |                            |            |          |      |                        |            |                    |               |                        |            |                     |            |                        |            |              |            |   |            |                 |
| Rat Baiting Training                        | 20/09/2022   |   |          |      |                    |               |                     |            |                      |            |                       |            |                     |            |                          |            |                  |            |                            |            |          |      |                        |            |                    |               |                        |            |                     |            |                        |            |              |            |   |            |                 |
| SOP Manuring Training                       | 14/06/2022   |   |          |      |                    |               |                     |            |                      |            |                       |            |                     |            |                          |            |                  |            |                            |            |          |      |                        |            |                    |               |                        |            |                     |            |                        |            |              |            |   |            |                 |
| Fire Drill Training                         | 14/03/2022   |   |          |      |                    |               |                     |            |                      |            |                       |            |                     |            |                          |            |                  |            |                            |            |          |      |                        |            |                    |               |                        |            |                     |            |                        |            |              |            |   |            |                 |
| SOP & PPE Tractor Driver                    | 16/02/2022   |   |          |      |                    |               |                     |            |                      |            |                       |            |                     |            |                          |            |                  |            |                            |            |          |      |                        |            |                    |               |                        |            |                     |            |                        |            |              |            |   |            |                 |
| HIRARC Noise NRA                            | 30/10/2022   |   |          |      |                    |               |                     |            |                      |            |                       |            |                     |            |                          |            |                  |            |                            |            |          |      |                        |            |                    |               |                        |            |                     |            |                        |            |              |            |   |            |                 |
| Integrated Pest Management                  | 10/10/2021   |   |          |      |                    |               |                     |            |                      |            |                       |            |                     |            |                          |            |                  |            |                            |            |          |      |                        |            |                    |               |                        |            |                     |            |                        |            |              |            |   |            |                 |
| Training                                    | Date   |   |          |      |                    |               |                     |            |                      |            |                       |            |                     |            |                          |            |                  |            |                            |            |          |      |                        |            |                    |               |                        |            |                     |            |                        |            |              |            |   |            |                 |
| NRA Awareness Training                      | 27/01/2022   |   |          |      |                    |               |                     |            |                      |            |                       |            |                     |            |                          |            |                  |            |                            |            |          |      |                        |            |                    |               |                        |            |                     |            |                        |            |              |            |   |            |                 |
| First Aid Training                          | 23-24/03/2022  |   |          |      |                    |               |                     |            |                      |            |                       |            |                     |            |                          |            |                  |            |                            |            |          |      |                        |            |                    |               |                        |            |                     |            |                        |            |              |            |   |            |                 |
| Shovel Safety Training                      | 01/06/2022   |   |          |      |                    |               |                     |            |                      |            |                       |            |                     |            |                          |            |                  |            |                            |            |          |      |                        |            |                    |               |                        |            |                     |            |                        |            |              |            |   |            |                 |
| Fire Drill Training                         | 13/06/2022   |   |          |      |                    |               |                     |            |                      |            |                       |            |                     |            |                          |            |                  |            |                            |            |          |      |                        |            |                    |               |                        |            |                     |            |                        |            |              |            |   |            |                 |
| PPE Awareness Training                      | 15/03/2022   |   |          |      |                    |               |                     |            |                      |            |                       |            |                     |            |                          |            |                  |            |                            |            |          |      |                        |            |                    |               |                        |            |                     |            |                        |            |              |            |   |            |                 |
| CPR Training                                | 19/10/2022   |   |          |      |                    |               |                     |            |                      |            |                       |            |                     |            |                          |            |                  |            |                            |            |          |      |                        |            |                    |               |                        |            |                     |            |                        |            |              |            |   |            |                 |
| Spillage Kit and Chemical Handling Training | 18/10/2022   |   |          |      |                    |               |                     |            |                      |            |                       |            |                     |            |                          |            |                  |            |                            |            |          |      |                        |            |                    |               |                        |            |                     |            |                        |            |              |            |   |            |                 |

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|  |  | Safety Valve Training                    | 18/05/2022 |  |
|  |  | Chemical handling Hexane                 | 25/05/2022 |  |
|  |  | <u>Jernih Estate</u>                     |            |  |
|  |  | Training                                 | Date       |  |
|  |  | Chemical Calibration and Weed Management | 11/10/2022 |  |
|  |  | Personal Hearing Protection (PHP)        | 27/07/2022 |  |
|  |  | First Aid CPR Training                   | 27/06/2022 |  |
|  |  | Fire Extinguisher & Fire Drill           | 27/06/2022 |  |
|  |  | Rat Baiting                              | 10/05/2022 |  |
|  |  | Manuring Training                        | 10/05/2022 |  |
|  |  | IPM Training                             | 14/03/2022 |  |
|  |  | Triple Rinsing & Premix Training         | 20/03/2022 |  |
|  |  | PPE Training                             | 16/03/2022 |  |
|  |  | HIRARC Noise Training                    | 17/01/2022 |  |
|  |  | BTS Loader Training                      | 12/01/2022 |  |
|  |  | Harvesting and Pruning Training          | 12/01/2022 |  |

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| 3.7.3   | <p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>   | <p>The mill has identified all relevant personnel involve in supply chain system such as Mill Manager, Asst. Mill Manager, Compliance Executive, Compliance Clerk, Laboratory Staf, Weighbridge Operator, Security, and Grader. The mill conducted the training need analysis for the personnel identified in SCCS. Latest training was conducted as follows:</p> <p>1. RSPO &amp; MSPO Supply Chain / Traceability Training dated 09/08/2022</p>                                | Complied       |
| <p><b>Criterion 3.8:</b> Supply chain requirement for mills<br/>(note: All supply chain requirements are considered as <b>Critical (C)</b>. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p> |  |  |                |
| 3.8.1   | <p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p> | <p>Management has established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, Edition TDM/TRCBL/04, Rev. SCCS-02/2022 dated 01/01/2022 under Glossary section define the meaning of RSPO Identity preserved as supply chain model assured that the RSPO certified oil palm product delivered to the end user uniquely identifiable to a single RSPO certified supply base.</p>                                | Complied       |
| 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>Management has established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, Edition TDM/TRCBL/04, Rev. SCCS-02/2022 dated 01/01/2022 under Glossary section define the meaning of RSPO Identity preserved as supply chain model that allows certified claim to be transferred from one palm oil products to another through physical blending or administratively under strictly control circumstances.</p> | Not Applicable |

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|       |  | As the Kemaman POM is using Identity Preserve, the criteria is non-applicable.   |          |
| 3.8.3 | The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.  | The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.   | 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 mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim). Seen the Member ID: RSPO_PO1000001053<br>License ID no.: CB129441<br>Validity until: 31/10/2023  | 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> <ul style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able</li> </ul> | <p>Management has established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, Edition TDM/TRCBL/04, Rev. SCCS-02/2022 dated 01/01/2022. Subject covered in the SOP were:</p> <ol style="list-style-type: none"> <li>1. Introduction</li> <li>2. Objectives</li> <li>3. Responsibilities</li> <li>4. Control of documents and records</li> <li>5. Delivery FFB from estate</li> <li>6. Receiving FFB at the mill</li> <li>7. Process monitoring</li> <li>8. CPO and PK dispatch</li> </ol> | Complied |

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|              | <p>to demonstrate awareness of the mill’s procedures for the implementation of this standard.</p> <p>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>   | <p>9. Non-conforming products and/or documents<br/>           10. Products claims<br/>           11. Outsourced contractor<br/>           12. Training<br/>           13. Reclassification of mill’s supply chain models<br/>           14. Production line<br/>           15. Conversion factors<br/>           16. Internal audit<br/>           17. Complaints<br/>           18. Management review</p>   |                 |
| <p>3.8.6</p> | <p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p> | <p>Addressed in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, Edition TDM/TRCBL/04, Rev. SCCS-02/2022 dated 01/01/2022 under section 16.0 – Internal Audit.</p> <p>RSPO Supply Chain Internal Audit has been conducted on 02/08/2022. 3 issue raised during the audit and has been addressed by the mill. The results of Internal Audit were discussed in the Management Review Meeting.</p> <p>The mill has maintained the internal audit record and report. The Corrective Action Plan has been sent to the internal auditor and complete with root cause identification and correction</p> | <p>Complied</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>Addressed in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, Edition TDM/TRCBL/04, Rev. SCCS-02/2022 dated 01/01/2022 under</p>  | <p>Complied</p> |

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|  | <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>section 5 - Delivery FFB from estate and 6.0 - Receiving FFB at the mill.</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>The mill received RSPO certified FFB only from TDM Plantations estates. The mill have system to verify at the weighbridge. Information for RSPO certified FFB were recorded in FFB Consignment notes and weighbridge tickets. Records verified during the audit as follow:</p> <p>Sighted the sampled delivery off FFB as follows:</p> <p>Sample 1</p> <ul style="list-style-type: none"> <li>• Weighbridge ticket no.: KTP22303727</li> <li>• FFB delivery note: 1062</li> <li>• Name of estates: Tebak Estate</li> <li>• Transporter: TDM Plantation Sdn Bhd</li> <li>• Vehicle no.: TAF211</li> <li>• Field/Year of planting: PM20A1T</li> <li>• Date: 08/02/2022</li> <li>• Net weight: 6.08 MT</li> </ul> <p>Sample 2</p> <ul style="list-style-type: none"> <li>• Weighbridge ticket no.: KTP22303750</li> <li>• FFB delivery note: 1233</li> <li>• Name of estates: Air Putih Estate</li> <li>• Transporter: CTR-Contract</li> <li>• Vehicle no.: MBQ781</li> </ul> |  |
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|       |  | <ul style="list-style-type: none"> <li>• Field/Year of planting: PM16A</li> <li>• Date: 08/02/2022</li> <li>• Net weight: 9.53 MT</li> </ul> <p>Sample 3</p> <ul style="list-style-type: none"> <li>• Weighbridge ticket no.: KTP22314990</li> <li>• FFB delivery note: 5188</li> <li>• Name of estates: Tabung Warisan Estate</li> <li>• Transporter: TDM Plantation Sdn Bhd</li> <li>• Vehicle no.: TAK4371</li> <li>• Field/Year of planting: PM96A2TW</li> <li>• Date: 06/09/2022</li> <li>• Net weight: 8.23 MT</li> </ul>  |          |
| 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> <ol style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> </ol> | <p>Addressed in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, Edition TDM/TRCBL/04, Rev. SCCS-02/2022 dated 01/01/2022 under section 8.0 CPO and PK dispatch.</p> <p>Sampled of the sales and goods out delivery records as below:</p> <p>CPO – Sample 1</p> <ol style="list-style-type: none"> <li>a) The name and address of the buyer: PGEO Edible Oils Sdn Bhd</li> <li>b) The name and address of the seller: TDM Kemaman POM</li> <li>c) The loading or shipment/ delivery date: 25/02/2022</li> <li>d) The date on which the documents were issued: 25/02/2022</li> <li>e) RSPO certificate number: RSPO 587626</li> <li>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 IP.</li> </ol> | Complied |

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|              | <ul style="list-style-type: none"> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>  | <ul style="list-style-type: none"> <li>g) The quantity of the products delivered: 45.70MT</li> <li>h) Any related transport documentation: Lorry Registration No: SB9258B</li> <li>i) A unique identification number: 196984</li> <li>PK – Sample 1</li> <li>a) The name and address of the buyer: Hup Lee Oil Mill Sdn Bhd</li> <li>b) The name and address of the seller: TDM Kemaman POM</li> <li>c) The loading or shipment/ delivery date: 19/09/2022</li> <li>d) The date on which the documents were issued: 19/09/2022</li> <li>e) RSPO certificate number: RSPO 587626</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Palm Kernel (PK) RSPO IP.</li> <li>g) The quantity of the products delivered: 46.21MT</li> <li>h) Any related transport documentation: Lorry Registration No: PNJ1423</li> <li>i) A unique identification number: 20148</li> </ul> |                 |
| <p>3.8.9</p> | <p><b>Outsourcing Activities</b></p> <ul style="list-style-type: none"> <li>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</li> <li>ii) The mill shall ensure the following: <ul style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>i) No CPO and PK process, bulking facilities outsourced by the mill. Only transporter were assigned for transport the CPO and PK. Kemaman POM were holding the agreement between transporter and contains all requirement in the RSPO Supply Chain. Addressed in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, Edition TDM/TRCBL/04, Rev. SCCS-02/2022 dated 01/01/2022 under section 8. CPO and PK dispatch.</li> <li>ii) Refer Transporter for CPO and PK; Contract agreement between TDM Plantation Sdn. Bhd with Sutera Adela Sdn Bhd dated</li> </ul>   | <p>Complied</p> |

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|        | <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>17/07/2019 and contract extension letter dated 13/09/2022 with reference number TDMP/OD/09/01.32.</p> <p>a. Kemaman POM has legal ownership of all CPO and PK transported. All details included in the weighbridge ticket with RSPO stamping</p> <p>b. Agreement between Kemaman POM with transporter were locate at HQ and copy was available at the office. Agreement were sign by both parties. Stated in the agreement that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c. Documented procedure addressed in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, Edition TDM/TRCBL/04, Rev. SCCS-02/2022 dated 01/01/2022</p> <p>d. Detailed in The contract agreements specified that all transporters are required to fulfil and comply with applicable legal requirements as well as TDM own requirements which include the RSPO and MSPO standard and provide all information requires by engaged certification bodies. Refer Section 12 (ii).</p> |          |
| 3.8.10 | The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.  | List of contracted parties were made available for verification at visited sites and incorporated in FY2022 stakeholder list   | Complied |
| 3.8.11 | The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.   | There were no new contractors used for the physical handling of RSPO certified products by the Mill.   | Complied |
| 3.8.12 | Record keeping  | TDM has established Standard Operating Procedure to maintain all records of evidence on the implementation of RSPO SCCS. The SOP was documented in Standard Operating Procedure RSPO Supply  | Complied |

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|               | <ul style="list-style-type: none"> <li>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</li> <li>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</li> <li>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</li> <li>iv) For Mass Balance Module, the mill:             <ul style="list-style-type: none"> <li>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</li> <li>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</li> <li>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</li> </ul> </li> </ul> | <p>Chain SOP – Identity Preserved and Mass Balance Module, edition: TDM/TRCBLT/04, revision: SCCS – 02/2022 dated 01/01/2022..</p> <p>As stated in SOP under section 4.0: Control of Documents and Records all traceability records should be maintained at minimum period of 5 years.</p> <p>Kemaman POM use Identity Preserved module as the mill only received FFB from certified source.</p> <p>The mill has established the SCCS Mass balance sheet document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. Reviewed the mass balance sheet report for the period of September 2021 till September 2022.</p> <p>All volumes of certified CPO and PK that were delivered were deducted from the material accounting system according to conversion ratios of OER and KER.</p> |                 |
| <p>3.8.13</p> | <p><b>Extraction Rate</b></p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>  | <p>TDM has established Standard Operating Procedure to maintain all records of evidence on the implementation of RSPO SCCS. The SOP was documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition: TDM/TRCBLT/04, revision: SCCS – 02/2022 dated 01/01/2022 under section 15: Conversion factors.</p> <p>Conversion factor of CPO and PK production is depending on the actual OER and KER. The conversion factors were reported daily in</p>   | <p>Complied</p> |

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|            |   | <p>the Daily Production Report. Reviewed the daily production report as follows:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>OER</th> <th>KER</th> </tr> </thead> <tbody> <tr> <td>28/07/2022</td> <td>20.15</td> <td>4.21</td> </tr> <tr> <td>31/08/2022</td> <td>20.10</td> <td>4.07</td> </tr> <tr> <td>30/09/2022</td> <td>20.17</td> <td>4.22</td> </tr> </tbody> </table>  | Date     | OER | KER | 28/07/2022 | 20.15 | 4.21 | 31/08/2022 | 20.10 | 4.07 | 30/09/2022 | 20.17 | 4.22 |          |
|------------|---|--|----------|-----|-----|------------|-------|------|------------|-------|------|------------|-------|------|----------|
| Date       | OER   | KER  |          |     |     |            |       |      |            |       |      |            |       |      |          |
| 28/07/2022 | 20.15   | 4.21   |          |     |     |            |       |      |            |       |      |            |       |      |          |
| 31/08/2022 | 20.10   | 4.07   |          |     |     |            |       |      |            |       |      |            |       |      |          |
| 30/09/2022 | 20.17   | 4.22   |          |     |     |            |       |      |            |       |      |            |       |      |          |
| 3.8.14     | <p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>   | <p>The facility is using the actual extraction rate and therefore updating of rates is not necessary.</p> <p>Conversion factor of CPO and PK production is depending on the actual OER and KER. The conversion factors were reported daily in the Daily Production Report. Reviewed the daily production report as follows:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>OER</th> <th>KER</th> </tr> </thead> <tbody> <tr> <td>28/07/2022</td> <td>20.15</td> <td>4.21</td> </tr> <tr> <td>31/08/2022</td> <td>20.10</td> <td>4.07</td> </tr> <tr> <td>30/09/2022</td> <td>20.17</td> <td>4.22</td> </tr> </tbody> </table> | Date     | OER | KER | 28/07/2022 | 20.15 | 4.21 | 31/08/2022 | 20.10 | 4.07 | 30/09/2022 | 20.17 | 4.22 | Complied |
| Date       | OER   | KER  |          |     |     |            |       |      |            |       |      |            |       |      |          |
| 28/07/2022 | 20.15   | 4.21   |          |     |     |            |       |      |            |       |      |            |       |      |          |
| 31/08/2022 | 20.10   | 4.07   |          |     |     |            |       |      |            |       |      |            |       |      |          |
| 30/09/2022 | 20.17   | 4.22   |          |     |     |            |       |      |            |       |      |            |       |      |          |
| 3.8.15     | <p><b>Processing</b></p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p> | <p>No incoming of uncertified FFB and mill only process RSPO certified FFB from TDM group estates. Hence there are no uncertified products being produced, stored or transported for this certification unit.</p>  | Complied |     |     |            |       |      |            |       |      |            |       |      |          |
| 3.8.16     | <p><b>Registration of Transactions</b></p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to</p>  | <p>Shipping announcement in the RSPO IT platform carried out by by the mills when RSPO certified products are sold as certified to refineries. Details of transaction summarized under table 11A.</p>  | Complied |     |     |            |       |      |            |       |      |            |       |      |          |

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|   | <p>refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>  | <p>Total of registered transaction from September 2021 to September 2022;</p> <table border="1" data-bbox="1151 432 1928 533"> <thead> <tr> <th>CPO</th> <th>PK</th> </tr> </thead> <tbody> <tr> <td>36,527.15</td> <td>8,685.13</td> </tr> </tbody> </table> <p>Based on the downloaded transactions register from the certification unit's Palm trace, the company was able to demonstrate that it has been registering its transactions in the Palm trace accordingly. Based on the announcement (transaction) summary, all the registrations were found to be in order.</p> | CPO            | PK | 36,527.15 | 8,685.13 |  |
|---|---|---|----------------|----|-----------|----------|--|
| CPO                                     | PK  |   |                |    |           |          |  |
| 36,527.15                               | 8,685.13  |   |                |    |           |          |  |
| 3.8.17                                  | <p><b>Claims</b></p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>  | <p>RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>  | Complied       |    |           |          |  |
| <b>General corporate communications</b> |   |   |                |    |           |          |  |
| 4.1                                     | <p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>  | <p>TDM Kemaman POM does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records.</p>  | Complied       |    |           |          |  |
| 4.2                                     | <p>In corporate communications a member is allowed to:</p> <ol style="list-style-type: none"> <li>Display its RSPO membership status</li> <li>Display the RSPO web address (www.rspo.org)</li> <li>State that the member supports the work of the RSPO</li> <li>State the member's history with regard to the RSPO.</li> <li>Use the RSPO trademark to promote its membership of the RSPO.</li> </ol> | <p>Not applicable as since TDM Kemaman POM did not use any RSPO logo or trademarks as corporate communication</p>   | Not Applicable |    |           |          |  |

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|  | 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.   |  |                |
| 4.3  | In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.   | Not applicable as since TDM Kemaman POM did not use any RSPO logo or trademarks as corporate communication   | Not Applicable |
| 4.4  | Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.   | Not applicable as since TDM Kemaman POM did not use any RSPO logo or trademarks as corporate communication   | Not Applicable |
| 4.5  | Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.   | There was no RSPO corporate logo has been used verified through website, notice board, business card, shipping documentation and procurement/ purchasing document.   | Complied       |
| <b>Business to business communications</b> |   |  |                |
| 5.1  | Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.   | Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. Verified the weighbridge tickets to buyer where claim of CSPO (Identity Preserved) was stamped on the tickets. | Complied       |
| 5.2  | When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.   | Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that the product is CSPO (Identity Preserved) with RSPO certificate number: RSPO 587626.                                  | Complied       |
| 5.3  | Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:<br>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 | TDM Kemaman POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.   | Not Applicable |

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|  | <p>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>   |   |          |
| <b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b> |  |   |          |
| <b>Certified oil palm content (IP)</b>                               |  |   |          |
|  | For IP, 95% or above of the oil palm content must be RSPO IP-certified.  | Oil palm content is 100% CPO and claim as RSPO IP-certified.  | Complied |
|  | For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.  | No SG claim made.   | 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 volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.   | Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.   | Complied |
| <b>Labelling and trademark (IP)</b>                                  |  |   |          |
|  | <p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'CERTIFIED' or</li> <li>• RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</li> </ul> | TDM Kemaman POM is not use RSPO label in its product (CPO & PK). This is confirmed due site visit observation and interview with the mill management. | Complied |

| <b>Messaging (IP)</b>  |  |   |          |
|--|--|---|----------|
|  | <p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'CERTIFIED' or</li> <li>• RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</li> </ul> | <p>As to date, no RSPO trademark used on the RSPO products. TDM Plantation Sdn Bhd has stated the member's history with regard to RSPO in the company's website without the trademark logo used. TDM Kemaman POM is not use RSPO label in its product (CPO &amp; PK). This is confirmed due site visit observation and interview with the mill management.</p>  | Complied |
| <b>Principle 4: Respect community and human rights and deliver benefits</b>  |  |   |          |
| <b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.                                       |  |   |          |
| 4.1.1  | <p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>  | <p>Kemaman POM management unit subscribed to Human Rights Policy dated 1<sup>st</sup> January 2022 signed by new CEO. This Policy is documented and affirms the Company's commitment to support the principle of Universal Declaration of Human Rights and ILO Core Convention ON Labour Standards as to identify, evaluate and manage the social impact on human rights.</p> <p>Policy was communicated and briefed to all workers in order for them to understand their responsibility in respect of human rights. For example the latest briefing was carried out at Gajah Mati Estate on 14/2/2022.</p> | Complied |
| 4.1.2  | <p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>  | <p>Based on documentation review, observations and stakeholder interviews, there is no evidence that Kemaman POM certification unit had instigated violence or used any form of harassment in its operations.</p>   | Complied |
| <b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties |  |   |          |

|       |   |  |          |
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| 4.2.1 | <p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p> | <p>TDM Plantation Sdn Bhd has developed a Communication Procedure – <i>Carta Aliran Pendedalian Isu Sosial (Stakeholder) (Aduan / Rungutan / Permohonan)   Social issues Flowchart (stakeholders) (Complaint/Application), rev.2/2017</i>. The information / issue reported shall be rectify according to type of communication. E.g. <i>Prosedur Komunikasi Dengan Pihak Kilang / Ladang, within 28 days &amp; Prosedur Aduan / Rungutan</i>; within 28 working days which include discussion with relevant parties, manager and top management. If further action request is involved Head Office, then the management will submit the request to Head Office for further approval and shall be rectified within 30 working day.</p> | Complied |
| 4.2.2 | <p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>  | <p>To ensure understanding of all affected and/or illiterate parties, the information is provided in local language and briefed to workers during muster and stakeholder meeting. This was confirmed during onsite interview session with both internal and external stakeholders.</p>   | 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>During this audit, there is no evidence of any grievance filed by stakeholders. However, in accordance with the grievance procedure reviewed, the complainants are to be informed of the status of the complaints at various stages of the dispute resolution process; e.g. within 14 days of receipt of complaint received by the estate management and to be resolved within 30 days. Outcome of resolution process is available and communicated to relevant stakeholders.</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>Conflict resolution mechanism is defined in the flowchart named Communication Procedure – <i>Carta Aliran Pendedalian Isu Sosial (Stakeholder) (Aduan / Rungutan / Permohonan)   Social issues Flowchart (stakeholders) (Complaint/Application), rev.2/2017</i>. Mediation included in consultation process for resolution which to allow party to be represented as in this case, union @ NUPW or other personnel appointed/chosen by the complainant. As for external</p>   | Complied |

|   |  | party, the can choose any person to act as observers, as well as the option of a third-party mediator.  |          |                    |               |        |   |   |                         |          |  |
|---|--|---|----------|--------------------|---------------|--------|---|---|-------------------------|----------|--|
| <b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.  |  |   |          |                    |               |        |   |   |                         |          |  |
| 4.3.1   | Contributions to community development that are based on the results of consultation with local communities are demonstrated.<br>- Minor compliance -  | Mill and estates’ management has made contribution to the local communities and workers. The management has provided recreational facilities such as football field, community hall and mosque to the local communities. Besides, the management has made donation to schools for the events upon request by the stakeholders. Interviewed with the representative from school confirmed that the management has provided assistance (donation) and workforce to help for any repairs and upkeep. All the above issues were captured during consultation with communities through stakeholder meetings and during engagement process (visit, teh-tarik session etc) | Complied |                    |               |        |   |   |                         |          |  |
| <b>Criterion 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent. |  |   |          |                    |               |        |   |   |                         |          |  |
| 4.4.1   | <b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.<br>- Critical (Major) compliance - | Land titles are available to demonstrate evidence of land leases. The land titles contain information on lessee, hectarage, terms and conditions of lease period and grant numbers.<br>The following land titles were sampled:<br><u>Gajah Mati Estate</u>  | Complied |                    |               |        |   |   |                         |          |  |
|   |  | <table border="1"> <thead> <tr> <th>No.</th> <th>Land title details</th> <th>Land use type</th> <th>Tenure</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>District: Dungun,<br/>Mukim: Besul, grant no. HK 14644, lot no. 3999<br/>Total hectare: 5139 ha</td> <td>Cultivation of oil palm</td> <td>Freehold</td> </tr> </tbody> </table>  | No.      | Land title details | Land use type | Tenure | 1 | District: Dungun,<br>Mukim: Besul, grant no. HK 14644, lot no. 3999<br>Total hectare: 5139 ha | Cultivation of oil palm | Freehold |  |
| No.   | Land title details   | Land use type   | Tenure   |                    |               |        |   |   |                         |          |  |
| 1   | District: Dungun,<br>Mukim: Besul, grant no. HK 14644, lot no. 3999<br>Total hectare: 5139 ha  | Cultivation of oil palm   | Freehold |                    |               |        |   |   |                         |          |  |

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|        |   | (share with Pinang Emas estate)  |   |                         |  |  |
|        |   | <u>Jernih Estate</u>   |   |                         |  |  |
|        |   | <b>No.</b>   | <b>Land title details</b>   | <b>Land use type</b>    | <b>Tenure</b>                                    |  |
|        |   | 1  | District: Kemaman, Mukim: Tebak, HS(D)no. 1779, no. PT 1666<br><br>Total hectare: 3,681.1 ha          | Cultivation of oil palm | Lease hold for 99 years (lease until 19/12/2052) |  |
|        |   | 2  | District: Kemaman, Mukim: Tebak, grant HS(D)no. 2872, no. PT 402 (B)<br><br>Total hectare: 198.191 ha | Cultivation of oil palm | Freehold   |  |
| 4.4.2  | Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:   | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. Therefore, there was no documents evidence of any negotiated agreements detailing FPIC process. |   |                         | 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, | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.   |   |                         | Complied   |  |

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|        | including information on the steps that are taken to involve them in decision making.<br>- Minor compliance -   |  |          |
| 4.4.2b | Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.<br>- Minor compliance -  | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. | Complied |
| 4.4.2c | Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.<br>- Minor compliance - | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. | Complied |
| 4.4.3  | <b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).<br>- Critical (Major) compliance -   | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. | Complied |
| 4.4.4  | All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.<br>- Minor compliance -   | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. | Complied |
| 4.4.5  | <b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.<br>- Critical (Major) compliance -   | Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. | Complied |

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| 4.4.6  | <p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>  | <p>Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.</p>   | Complied |
| <p><b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p> |   |   |          |
| 4.5.1  | <p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>  | <p>Kemaman POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area. Documented procedure is in place as per "Flowchart and Procedures On Handling Land Disputes", Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 &amp; procedure Doc. No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017; that states the process of resolve the land dispute issues. Objectives of the procedure is to ensure the land dispute is resolved in timely manner. Types of disputes are such as disputes over land boundaries, conflicts with land-owners and land ownerships. Verification process of conflict will be carried out and affected stakeholders need to be informed. Compensation and negotiation process will be carried out as per the mutual agreement of both parties.</p> | Complied |
| 4.5.2  | <p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p> | <p>Kemaman POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.</p>   | Complied |

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| 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>Kemaman POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.</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>Kemaman POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.</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>Kemaman POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.</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>Kemaman POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.</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>Kemaman POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.</p> | Complied |

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| 4.5.8  | <p><b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>  | <p>No acquired new lands in the areas inhabited by communities within Kemaman POM certification unit</p>   | <p>Complied</p>       |
| <p><b>Criterion 4.6:</b> Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p> |  |  |                       |
| 4.6.1  | <p><b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>  | <p>Documented procedure is in place as per "Flowchart and Procedures On Handling Land Disputes", Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 &amp; procedure Doc. No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017; that states the process of resolve the land dispute issues. Objectives of the procedure is to ensure the land dispute is resolved in timely manner. Types of disputes are such as disputes over land boundaries, conflicts with land-owners and land ownerships. Verification process of conflict will be carried out and affected stakeholders need to be informed. Compensation and negotiation process will be carried out as per the mutual agreement of both parties. This process disseminated to the external stakeholders through stakeholder meeting.</p> | <p>Complied</p>       |
| 4.6.2  | <p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p> | <p>The process is explained under "Flowchart and Procedures On Handling Land Disputes", Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 &amp; procedure Doc. No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017</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>No scheme smallholdings within Kemaman POM certification unit. Thus this indicator is not applicable.</p>   | <p>Not Applicable</p> |

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| 4.6.4  | The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.<br>- Minor compliance -  | At the point of audit, there was no process and outcomes of any negotiated agreements, compensation and payments reported.   | Complied |
| <b>Criterion 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements. |  |  |          |
| 4.7.1  | <b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.<br>- Critical (Major) compliance -   | There is a guidance procedure for "Flowchart and Procedures On Handling Land Disputes", Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017  | Complied |
| 4.7.2  | <b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.<br>- Critical (Major) compliance -  | The process is explained under "Flowchart and Procedures On Handling Land Disputes", Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017   | Complied |
| 4.7.3  | 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.<br>- Minor compliance -  | TDM has established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes. Compensation procedure has been clearly stated in the procedure as well. | Complied |
| <b>Criterion 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.   |  |  |          |
| 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. | TDM has established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as   | Complied |

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|   | - Minor compliance -   | well as boundaries disputes. Compensation procedure has been clearly stated in the procedure as well.  |          |
| 4.8.2   | <p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p> | There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.   | Complied |
| 4.8.3   | <p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>  | TDM has established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes. Compensation procedure has been clearly stated in the procedure as well. | Complied |
| 4.8.4   | <p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p>   | There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.   | Complied |
| <b>Principle 5: Support smallholder inclusion</b>   |  |  |          |
| <b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses. |  |  |          |
| 5.1.1   | <p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>  | Kemaman POM only received RSPO certified FFB from TDM South Zone Group estate. No other uncertified FFB received from smallholders or other indirect FFB supplier.   | Complied |
| 5.1.2   | <p><b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p>  | Kemaman POM only received RSPO certified FFB from TDM South Zone Group estate. No other uncertified FFB received from smallholders or other indirect FFB supplier.   | Complied |

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|       | - Critical (Major) compliance -   |  |          |
| 5.1.3 | <b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.<br>- Critical (Major) compliance -  | Kemaman POM only received RSPO certified FFB from TDM South Zone Group estate. No other uncertified FFB received from smallholders or other indirect FFB supplier.   | Complied |
| 5.1.4 | <b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.<br>- Critical (Major) compliance - | Kemaman POM only received RSPO certified FFB from TDM South Zone Group estate. No other uncertified FFB received from smallholders or other indirect FFB supplier.   | Complied |
| 5.1.5 | Contracts are fair, legal and transparent and have an agreed timeframe.<br>- Minor compliance -   | Kemaman POM only received RSPO certified FFB from TDM South Zone Group estate. No other uncertified FFB received from smallholders or other indirect FFB supplier.   | Complied |
| 5.1.6 | <b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.<br>- Critical (Major) compliance -  | Kemaman POM only received RSPO certified FFB from TDM South Zone Group estate. No other uncertified FFB received from smallholders or other indirect FFB supplier.   | Complied |
| 5.1.7 | Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).<br>- Minor compliance -   | Kemaman POM verified its weighing equipment as per mandatory requirements of Weights and Measures Act 1972 as per latest records of stamping by Metrology Corporation Malaysia Sdn. Bhd. as following:<br>- Weighbridge stamp form # B596793; Equipment Serial # C204443091; Model: 80,000 kg Mettler Toledo; Calibration date: 14/3/22<br>- Weighbridge stamp form # B692272; Serial # B849884850; Model: 60,000 kg; Calibration date: 29/6/2022. | Complied |

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| 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.<br>- Minor compliance -                      | No independent smallholders within Kemaman POM certification unit.  | Complied |
| 5.1.9   | <b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.<br>- Critical (Major) compliance -   | TDM has established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes. Compensation procedure has been clearly stated in the procedure as well. No independent smallholders within Kemaman POM certification unit. | Complied |
| <b>Criterion 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains. |   |   |          |
| 5.2.1   | The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification.<br>- Minor compliance -   | Kemaman POM only received RSPO certified FFB from TDM South Zone Group estate. No other uncertified FFB received from smallholders or other indirect FFB supplier.  | Complied |
| 5.2.2   | The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).<br>- Minor compliance - | Kemaman POM only received RSPO certified FFB from TDM South Zone Group estate. No other uncertified FFB received from smallholders or other indirect FFB supplier.  | Complied |
| 5.2.3   | Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.<br>- Minor compliance -   | Kemaman POM only received RSPO certified FFB from TDM South Zone Group estate. No other uncertified FFB received from smallholders or other indirect FFB supplier.  | Complied |

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| 5.2.4   | <b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.<br>- Critical (Major) compliance -   | Kemaman POM only received RSPO certified FFB from TDM South Zone Group estate. No other uncertified FFB received from smallholders or other indirect FFB supplier.   | Complied       |
| 5.2.5   | The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.<br>- Minor compliance -   | Kemaman POM only received RSPO certified FFB from TDM South Zone Group estate. No other uncertified FFB received from smallholders or other indirect FFB supplier.   | Complied       |
| <b>Principle 6: Respect workers' rights and conditions</b>      |  |  |                |
| <b>Criterion 6.1:</b> Any form of discrimination is prohibited. |  |  |                |
| 6.1.1   | <b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.<br>- Critical (Major) compliance - | TDM Plantation Sdn Bhd has revised the new Human Rights Policy / <i>Polisi Hak Hak Asasi Manusia</i> and Social Policy/ <i>Polisi Sosial</i> dated 1 <sup>st</sup> January 2022 by the new CEO. These policies stated the management commitment to treat everyone equally without any discrimination and provide equal opportunities regardless of race, nationality, gender and etc. Interviewed with workers confirmed that no discrimination practice by the management.  | Complied       |
| 6.1.2   | <b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.<br>- Critical (Major) compliance -   | Based on review of employment contracts, interviews with various workers and stakeholders, Kemaman POM certification unit is able to demonstrate that there is no form of discrimination involving workers and local communities. Its guest workers too are not discriminated against and receive the same remuneration rate and access to amenities as local workers.<br><br>Evidence of salary deduction under description (potongan permit kerja) was sighted in the pay slip for November 2021 and July 2022 for the following workers:<br>i) JN1800824 (Nov 21: RM 42.60)<br>ii) JN1400633 (July 22: RM 42.50)<br>iii) JN1900900 (Nov 21: RM 42.50) | Non-compliance |

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|       |   | <p>iv) JN1000396 (July 22: RM 42.50)<br/>v) JN1100486 (Nov 21: RM 42.50)<br/>vi) JN1600750 (July 22: RM 42.50)</p> <p>Based on company circular ref: TDMP/SMP/3/01.06 dated 15/4/2009, PLKS has to be paid by employee.</p> <p>Thus, a major NC was issued.</p>   |          |
| 6.1.3 | <p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p> | <p>Kemaman certification unit's Foreign Workers Policy dated 1<sup>st</sup> January 2022 assures that recruitment, promotion and remuneration individual qualifications and performance are based on interview with workers. Based on interview of sampled workers and documentation review which included job application forms, interview notes, and medical fitness confirmation, the Kemaman POM certification unit has demonstrated that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness.</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>Based on interviews with workers, Estate Health Assistant and review of documentations, no female workers are employed in manuring or spraying activities. Pregnancy testing will be carried out once in 3 months (only with their consent) for female workers. As confirmed by the Estate Health Assistant, should a field female worker becomes pregnant, she would immediately be offered an alternative lighter work and chemical related works are prohibited. A medical removal protection (MRP) as per NADOPOD Regulation 2004 will be initiated.</p>                     | Complied |
| 6.1.5 | <p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>                             | <p>Gender committee is in place and available at each operating units. Date of latest meetings as per the following:<br/>Kemaman POM – 5/9/22<br/>Jernih Estate – 21/9/22</p>   | Complied |

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|   |   | There were issues discussed related sexual harassment, domestic violence as well as reproductive rights. No reported case of harassment and violence so far.   |          |
| 6.1.6   | There is evidence of equal pay for the same work scope.<br>- Minor compliance -   | There is no any discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting. Based on verification of salary as per indicator 6.2.2 for both male and female workers (same work scope – mandora, field/general workers), evidence of equal pay was sighted with the same allowance and pay as per MAPA/NUPW collective agreement version 2019.  | Complied |
| <b>Criterion 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW). |   |  |          |
| 6.2.1   | <b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.<br>- Critical (Major) compliance - | Details of applicable labour laws, namely relevant provisions of the Employment Act 1955 and MAPA/NUPW agreement such as wages, rest day, workdays, working hours, overtime, annual leave, medical leave are contained in employment contracts signed between the company and each worker.<br><br>Documentation of pay is contained in payslips which are issued to the workers every month. Each payslip contains details such as name of worker, month of pay, total wages wage for the month, overtime pay, paid public holiday, paid medical leave (if any), price bonus, SGP, overtime, paid annual leave, statutory deductions such as SOCSO (for all workers), EIS and EPF (for Malaysian workers only), and other deductions, if any.<br><br>Both employment contracts and payslips are prepared in languages that they are familiar with, i.e. Bahasa Malaysia explained to the | Complied |

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|  |  | <p>workers by estate management with the presence of a translator/NUPW representative (if necessary)</p> <p>The following employment contracts and payslips for (November 2021 [peak], June 2022 [normal], July 2022 [low]) were sampled and verified during the audit:</p> <p>Jernih Estate: (10 workers sample out of 155 workers)</p> <ol style="list-style-type: none"> <li>1) JN1000396, joined date: 19/07/2010</li> <li>2) JN1100486, joined date: 01/08/2011</li> <li>3) JN1200560, joined date: 09/08/2012</li> <li>4) JN1600750, joined date: 26/05/2016</li> <li>5) JN1400633, joined date: 26/03/2014</li> <li>6) JN1800824, joined date: 21/03/2018</li> <li>7) JN1900900, joined date: 01/11/2019</li> <li>8) JN2100933, joined date: 02/01/2021</li> <li>9) JN2200988, joined date: 01/02/2022</li> <li>10) JN2201003, joined date: 04/07/2022</li> </ol> <p>Kemaman POM: (8 workers sample out of 90 workers)</p> <ol style="list-style-type: none"> <li>1) KM1800214, joined date: 1/2/2020</li> <li>2) KM2000220, joined date: 2/6/2020</li> <li>3) KM00016, joined date: 22/11/1994</li> <li>4) KM00011, joined date: 1/3/1997</li> <li>5) KM1800218, joined date: 2/6/2020</li> <li>6) KM00018, joined date: 20/8/1997</li> <li>7) KM0900163, joined date: 1/8/2011</li> <li>8) KM00070, joined date: 16/5/1997</li> </ol> <p>Gajah Mati Estate: 14 workers sample out of 307 workers)</p> |  |
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|       |  | <ol style="list-style-type: none"> <li>1) GM00056, joined date: 1/5/1998</li> <li>2) GM0901838, joined date: 1/11/2007</li> <li>3) GM0901998, joined date: 16/6/2021</li> <li>4) GM0902014, joined date: 5/7/2021</li> <li>5) GM0902091, joined date: 1/2/2022</li> <li>6) GM0902178, joined date: 20/6/2022</li> <li>7) GM0901366, joined date: 14/3/2011</li> <li>8) GM0901803, joined date: 7/6/2016</li> <li>9) GM0901921, joined date: 1/2/2019</li> <li>10) GM0901948, joined date: 20/1/2020</li> <li>11) GM0901366, joined date: 19/2/2013</li> <li>12) GM0901726, joined date: 1/11/2015</li> <li>13) GM0901754, joined date: 1/11/2015</li> <li>14) GM0902063, joined date: 1/11/2015</li> </ol>  |          |
| 6.2.2 | <p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p> | <p>Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers and staff at Kemaman POM and supplying estates. The documents are prepared in Bahasa Malaysia and English according to which language the workers are conversant in.</p> <p>It stipulates terms of conditions of service such as duration, position, wages payable, working hours, rest hours, holiday entitlement, that general and field workers would be paid according to MAPA/NUPW agreement.</p> <p>All the employment contracts sampled were signed by each worker and the Company. Review of the employment contracts show that the terms are in compliance with the provisions of the Employment Act 1955 and the MAPA/NUPW agreement. Interviews conducted</p> | Complied |

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|  |  | <p>with the workers confirmed that they understand the employment contracts, the terms were explained to them prior to signing, and a copy was given to each worker.</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. None of the sampled workers had any family members performing work on their behalf.</p> <p>The following employment contracts were sampled and verified during the audit:</p> <p>Jernih Estate: (10 workers sample out of 155 workers)</p> <ol style="list-style-type: none"> <li>1) JN1000396, joined date: 19/07/2010</li> <li>2) JN1100486, joined date: 01/08/2011</li> <li>3) JN1200560, joined date: 09/08/2012</li> <li>4) JN1600750, joined date: 26/05/2016</li> <li>5) JN1400633, joined date: 26/03/2014</li> <li>6) JN1800824, joined date: 21/03/2018</li> <li>7) JN1900900, joined date: 01/11/2019</li> <li>8) JN2100933, joined date: 02/01/2021</li> <li>9) JN2200988, joined date: 01/02/2022</li> <li>10) JN2201003, joined date: 04/07/2022</li> </ol> <p>Kemaman POM: (8 workers sample out of 90 workers)</p> <ol style="list-style-type: none"> <li>1) KM1800214, joined date: 1/2/2020</li> <li>2) KM2000220, joined date: 2/6/2020</li> <li>3) KM00016, joined date: 22/11/1994</li> <li>4) KM00011, joined date: 1/3/1997</li> <li>5) KM1800218, joined date: 2/6/2020</li> </ol> |  |
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|       |  | <p>6) KM00018, joined date: 20/8/1997<br/>         7) KM0900163, joined date: 1/8/2011<br/>         8) KM00070, joined date: 16/5/1997<br/>         Gajah Mati Estate: 14 workers sample out of 307 workers)<br/>         1) GM00056, joined date: 1/5/1998<br/>         2) GM0901838, joined date: 1/11/2007<br/>         3) GM0901998, joined date: 16/6/2021<br/>         4) GM0902014, joined date: 5/7/2021<br/>         5) GM0902091, joined date: 1/2/2022<br/>         6) GM0902178, joined date: 20/6/2022<br/>         7) GM0901366, joined date: 14/3/2011<br/>         8) GM0901803, joined date: 7/6//2016<br/>         9) GM0901921, joined date: 1/2/2019<br/>         10) GM0901948, joined date: 20/1/2020<br/>         11) GM0901366, joined date: 19/2/2013<br/>         12) GM0901726, joined date: 1/11/2015<br/>         13) GM0901754, joined date: 1/11/2015<br/>         14) GM0902063, joined date: 1/11/2015</p> <p>Based on the above sample workers, average daily wage @ ordinary rate of pay is more than Minimum Wages Order 2020 of RM46.15 per day. Law full deduction (SOCSO, EPF, EIS) is correctly made and appear in the pay slip. Based on the sample, total overtime hours have not exceeded 104 hours.</p> |                 |
| 6.2.3 | <p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave,</p> | <p>Kemaman POM and estates were able to demonstrated compliance with legal requirements on the following issues:</p>  | <p>Complied</p> |

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|       | <p>reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>   | <p>Regular working hours: Workers interviewed confirmed that they work 6 days in a week, with Friday being the rest day. Normal working hours is 8 hours per day, and this is also stipulated in the employment contracts.</p> <p>Deductions: Labour Department Permit for salary deductions is available in document JTK(T) 600.2.2.3 JLD.2(8) dated 5/9/19 for salary deductions are subject to consent from workers.</p> <p>Overtime, sickness and holiday entitlement: Based on overtime records, payslips, and interview with workers, evidence was available that overtime is paid in accordance with the Employment Act 1955 and MAPA/NUPW 2019 Agreement.</p> <p>For Kemaman POM, overtime hours approved for maximum of 130 hours based on approval dated 22/12/21, ref: BHG.PU/9/134 JLD 44 (20).</p> <p>Maternity leave: female workers are entitled to 2 months' paid maternity leave. This was confirmed during interview with the Secretary of the Gender Committee</p> |          |
| 6.2.4 | <p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p> | <p>Kemaman POM and estates provide good housing with good sanitation, medical facilities, and welfare amenities. Site visits were made to workers' housing. Overall, the houses and surrounding compound are well maintained with clean and flowing drains, no tall grass and household waste properly disposed of.</p> <p>All houses receive free water up to 35 gallon per day and electricity is subsidised for RM 5 per house per month. Each house has 2 rooms and in liveable condition. Among the amenities available include creche, surau, football field, sundry shop, canteen and a clinic. The clinic is managed by a Estate Health Assistant and is equipped with an ambulance. A visiting medical officer visits the clinic once a fortnight as shown on the record. Line site inspection is conducted</p>  | Complied |

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|                   |  | <p>on a weekly basis by the Estate Hospital Assistant. Summary of weekly inspection as per the following:</p> <table border="1" data-bbox="1137 432 1928 616"> <thead> <tr> <th>Estate/mill</th> <th>Date of inspection</th> </tr> </thead> <tbody> <tr> <td>Gajah Mati Estate</td> <td>17/10/2022, 10/10/2022, 3/10/2022,</td> </tr> <tr> <td>Kemaman POM</td> <td>5/10/2022, 12/10/2022, 16/10/2022</td> </tr> </tbody> </table>             | Estate/mill | Date of inspection | Gajah Mati Estate | 17/10/2022, 10/10/2022, 3/10/2022, | Kemaman POM | 5/10/2022, 12/10/2022, 16/10/2022 |  |
|-------------------|--|--|-------------|--------------------|-------------------|------------------------------------|-------------|-----------------------------------|--|
| Estate/mill       | Date of inspection   |  |             |                    |                   |                                    |             |                                   |  |
| Gajah Mati Estate | 17/10/2022, 10/10/2022, 3/10/2022,   |  |             |                    |                   |                                    |             |                                   |  |
| Kemaman POM       | 5/10/2022, 12/10/2022, 16/10/2022  |  |             |                    |                   |                                    |             |                                   |  |
| 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>Kemaman POM and estates were able to demonstrate workers' access to adequate, sufficient and affordable food. There is a sundry shop and a food canteen near the linesite. The sundry shop sells daily requirements such as vegetables, rice, flour, eggs, sugar, milk, cooking oil, frozen food, beverages, toiletries, etc.</p>   | Complied    |                    |                   |                                    |             |                                   |  |
| 6.2.6             | <p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p><b>PROCEDURAL NOTE:</b></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>Prevailing wages and in-kind benefits assessment conducted by Unit of Certification (UoC). As for 2020, a baseline/pilot project for the assessment was carried out at one sample estate (Air Putih Estate).</p> <p>In-kind benefit: RM 957</p> <p>Take home salary: RM 1,200</p> <p>Total: RM2,157</p> <p>Progressively, prevailing wages calculation will be extended to each operating units to set a benchmark value for reference.</p> | Complied    |                    |                   |                                    |             |                                   |  |

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

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| <p><b>Criterion 6.3:</b> The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p> |  |   |          |
| 6.3.1   | <p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p> | <p>Published statement in local language recognizing freedom of association policy is in place as documented in 'Freedom of Association Policy / <i>Polisi Kebebasan Berpersatuan</i> dated 1<sup>st</sup> January 2022. Workers interview confirmed that they are not being restricted to join or form trade 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>For selected estates; there are no union representative available onsite. All union related matter is handled by the NUPW Terengganu Branch Secretary. Documented communication between NUPW branch and estates (Gajah Mati and Jernih Estate) were sighted. Workers interview confirmed that the branch secretary visited them in several occasion to get feedback from workers. Meeting with management was carried at respective estates as per the following:<br/>           Gajah Mati Estate –14/02/2022<br/>           Kemaman POM –11/08/2022<br/>           Jernih Estate –21/06/2022</p> | Complied |
| 6.3.3   | <p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>   | <p>As confirmed by the workers during interview, all worker representatives were freely elected among and by the workers themselves. They comprise various nationalities, and were selected based on experience, communication skills and number of years worked</p>  | Complied |
| <p><b>Criterion 6.4:</b> Children are not employed or exploited.</p>  |  |   |          |
| 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>TDM Plantation Sdn Bhd has developed Social Policy/<i>Polisi Sosial</i> and Protection of Children Policy/<i>Polisi Perlindungan Kanak Kanak</i> dated 1<sup>st</sup> January 2022; that states company's commitment for not exploiting, using and recruiting child labour which under 16 years old.</p>   | Complied |

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|   | - Minor compliance -   | Document reviewed, workers interview and stakeholder consultation confirmed that no historical child labour employed in the company. Youngest workers hired by the company is 18 years old.  |          |
| 6.4.2   | <p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p> | <p>There was no evidence that Kemaman POM and estates employ anyone below the age of 18 years. This was verified by examining the master lists of each operating unit. A documented age screening verification procedure exists where details of the workers' passport and IC and dates of birth are reviewed and verified before issuance of employment contracts.</p> <p>Copies of identity cards and passports were sampled and verified during the audit. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.</p> | Complied |
| 6.4.3   | <p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>  | <p>Based on documents sighted, interviews and observations, there was no evidence that Kemaman POM and estates employ any young persons. This was further verified by examining the master lists of each operating unit where details of the workers' IC numbers and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.</p>  | Complied |
| 6.4.4   | <p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>           | <p>TDM Plantation Sdn Bhd has developed Social Policy/<i>Polisi Sosial</i> and Protection of Children Policy/<i>Polisi Perlindungan Kanak Kanak</i> dated 1<sup>st</sup> January 2022; that states company's commitment for not exploiting, using and recruiting child labour which under 16 years old. Document reviewed, workers interview and stakeholder consultation confirmed that no historical child labour employed in the company. Youngest workers hired by the company is 18 years old.</p>  | Complied |
| <p><b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p> |  |  |          |

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| 6.5.1   | <p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>         | <p>Gender Policy was developed and implemented in TDM Plantation Sdn Bhd where the company has the responsibility to take care the rights of workers. Latest policy dated 1<sup>st</sup> January 2022 endorsed by the new CEO was sighted. They will protect the rights of female workers and action will be taken immediately if there is any sexual harassment case reported. Sighted training attendance record during muster ground rollcall for Jernih Estate (<i>Training on TDMP policies</i>) dated 4<sup>th</sup> June 2022.</p> | Complied |
| 6.5.2   | <p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>          | <p><i>Polisi Reproduksi</i> / Reproductive Rights Policy and Social Policy is in place, signed by the CEO dated 1<sup>st</sup> January 2022. Policy states company commitment not interfering in reproductive planning of the workers and ensuring rights of workers to decide and avoidance in discriminating and harsh treatment to the subjected workers.</p>  | Complied |
| 6.5.3   | <p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>           | <p>Assessment for new mothers' needs was done last year from 16-20/8/2021 via google form named "<i>Kaji Selidik Ibu Mengandung &amp; Menyusu</i>" to female workers in the estate and mill. Recommendation and further action required will be included in the SIA management plan. For this year no new mothers at each visited operating units.</p>  | Complied |
| 6.5.4   | <p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p> | <p><i>"Tatacara Aduan Gangguan Seksual"</i> / Complain Process for Sexual Harassment is in place; whereby any cases or suspicious cases is encouraged to be reported within 24 hours, investigated within 2 days and to be reported for action within 5 days. Gender and workers committee interview carried out during the stakeholder consultation as well as individual gender committee chairperson interview confirmed that there is no sexual harassment issues ever reported.</p>  | Complied |
| <b>Criterion 6.6:</b> No forms of forced or trafficked labour are used. |  |   |          |
| 6.6.1   | <p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p>   | <p>Based on documentation review and interviews with the workers, Kemaman POM and estates have demonstrated that workers of</p>   | Complied |

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|   |   |  |          |
|---|---|--|----------|
|   | <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees.</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p> | <p>various nationalities have entered into employment voluntarily. Consent letters from workers were also sighted.</p> <p>No recruitment fee charged to foreign workers. The contract signed between TDM Plantation Sdn Bhd and PT Primadaya Pratama Pandukarya, dated 2<sup>nd</sup> February 2020 also clearly stipulates that recruitment fee would be borne by the company.</p> <p>Workers were aware of the type of job they would be doing at the estate/mill before they left their own countries. All overtime work is done voluntarily, and workers are free to decline an offer for overtime work. Workers are also paid overtime rates in accordance with the Employment Act 1955. Workers are free to resign at any time they wish with no penalty payment. There is also no evidence of any withholding of wages.</p> |          |
| 6.6.2   | <p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>   | <p>Foreign Worker Policy (<i>Polisi Pekerja Asing</i>), signed by the Chief Executive Officer dated 1<sup>st</sup> January 2022 is in place. The policy states the commitment of the company to ensure recruit of migrant workers shall adhered to the Employment Act 1955, Immigration Act 1959/63 and Compensation Workmen Act 1952 and paid with reasonable wage according to the legal requirement. Based on the selected records, all migrant workers are found hired according to the legal requirement and provided with mandated benefits and minimum wage.</p>  | Complied |
| <p><b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p> |   |  |          |

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| 6.7.1                   | <p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p> | <p>Both operating units have formed an OSH Committee in the respective mill and estate to address all issues associated to Health and Safety in the operating units. The OSH Organisation Charts were available and displayed at the workstations.</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 mill and estates manager has been appointed as person responsible for safety and health cum chairman for safety and health committee in as per appointment letter signed by the CEO. 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. Concerns on issue related health, safety and welfare were discussed at these meetings and recorded. The OSH Committee meeting for Estate was conducted on quarterly basis. Reviewed the latest minutes meeting FY 2022 as follows:</p> <table border="1" data-bbox="1137 970 1928 1257"> <thead> <tr> <th>OSH Meeting 2022</th> <th>Gajah Mati Estate</th> <th>Jernih Estate</th> <th>Kemaman POM</th> </tr> </thead> <tbody> <tr> <td>1<sup>st</sup> Quarter</td> <td>22/03/2022</td> <td>24/01/2022</td> <td>17/04/2022</td> </tr> <tr> <td>2<sup>nd</sup> Quarter</td> <td>18/06/2022</td> <td>09/03/2022</td> <td>21/07/2022</td> </tr> <tr> <td>3<sup>rd</sup> Quarter</td> <td>11/09/2022</td> <td>22/06/2022</td> <td>19/09/2022</td> </tr> <tr> <td>4<sup>th</sup> Quarter</td> <td>-</td> <td>18/09/2022</td> <td>-</td> </tr> </tbody> </table> | OSH Meeting 2022 | Gajah Mati Estate | Jernih Estate | Kemaman POM | 1 <sup>st</sup> Quarter | 22/03/2022 | 24/01/2022 | 17/04/2022 | 2 <sup>nd</sup> Quarter | 18/06/2022 | 09/03/2022 | 21/07/2022 | 3 <sup>rd</sup> Quarter | 11/09/2022 | 22/06/2022 | 19/09/2022 | 4 <sup>th</sup> Quarter | - | 18/09/2022 | - | Complied |
|-------------------------|--|---|------------------|-------------------|---------------|-------------|-------------------------|------------|------------|------------|-------------------------|------------|------------|------------|-------------------------|------------|------------|------------|-------------------------|---|------------|---|----------|
| OSH Meeting 2022        | Gajah Mati Estate  | Jernih Estate   | Kemaman POM      |                   |               |             |                         |            |            |            |                         |            |            |            |                         |            |            |            |                         |   |            |   |          |
| 1 <sup>st</sup> Quarter | 22/03/2022   | 24/01/2022  | 17/04/2022       |                   |               |             |                         |            |            |            |                         |            |            |            |                         |            |            |            |                         |   |            |   |          |
| 2 <sup>nd</sup> Quarter | 18/06/2022   | 09/03/2022  | 21/07/2022       |                   |               |             |                         |            |            |            |                         |            |            |            |                         |            |            |            |                         |   |            |   |          |
| 3 <sup>rd</sup> Quarter | 11/09/2022   | 22/06/2022  | 19/09/2022       |                   |               |             |                         |            |            |            |                         |            |            |            |                         |            |            |            |                         |   |            |   |          |
| 4 <sup>th</sup> Quarter | -  | 18/09/2022  | -                |                   |               |             |                         |            |            |            |                         |            |            |            |                         |            |            |            |                         |   |            |   |          |
| 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</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</p>  | Complied         |                   |               |             |                         |            |            |            |                         |            |            |            |                         |            |            |            |                         |   |            |   |          |

|                   | <p>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>Spillage and Evacuation. Emergency Response Team was formed in the estate to counter any unwanted emergencies. TDM Plantation Sdn Bhd has established the SOP for Accident and emergency procedures documented in the Standard Operating Procedure – Emergency Preparedness and Response edition TDM/01, rev. no. TDMP-02/2018 dated 01/01/2018. In the SOP, the emergency plan and ERT to be activated according to the emergency situations as follows:</p> <ol style="list-style-type: none"> <li>1. Fig. 4.0 – Event of environmental and OSH emergencies including accident/incident</li> <li>2. Fig. 4.4a – Event of fire</li> <li>3. Fig. 4.4b – Event of Explosion</li> <li>4. Fig. 4.4c – Event of Oil Spillage</li> <li>5. Fig. 4.4d – Event of Effluent Spillage (mills).</li> </ol> <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 967 1926 1166"> <thead> <tr> <th>Estate/ Mill</th> <th>ERP Training date</th> </tr> </thead> <tbody> <tr> <td>Gajah Mati Estate</td> <td>14/03/2022</td> </tr> <tr> <td>Jernih Estate</td> <td>27/06/2022</td> </tr> <tr> <td>Kemaman POM</td> <td>13/06/2022</td> </tr> </tbody> </table> <p>SOP on First Aid has been reviewed. Refer SOP Procedure of First Aid Management dated 01/10/2022 Edition TDM/01 Revision TDM-02/2022. 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</p> | Estate/ Mill | ERP Training date | Gajah Mati Estate | 14/03/2022 | Jernih Estate | 27/06/2022 | Kemaman POM | 13/06/2022 |  |
|-------------------|---|---|--------------|-------------------|-------------------|------------|---------------|------------|-------------|------------|--|
| Estate/ Mill      | ERP Training date   |   |              |                   |                   |            |               |            |             |            |  |
| Gajah Mati Estate | 14/03/2022  |   |              |                   |                   |            |               |            |             |            |  |
| Jernih Estate     | 27/06/2022  |   |              |                   |                   |            |               |            |             |            |  |
| Kemaman POM       | 13/06/2022  |   |              |                   |                   |            |               |            |             |            |  |

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|                   |                         | <p>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 435 1921 667"> <thead> <tr> <th>Estate/ Mill</th> <th>First Aid Training date</th> <th>Latest First Aid Monitoring Record</th> </tr> </thead> <tbody> <tr> <td>Gajah Mati Estate</td> <td>23-24/03/2022</td> <td>07/10/2022</td> </tr> <tr> <td>Jernih Estate</td> <td>27/06/2022</td> <td>19/09/2022</td> </tr> <tr> <td>Kemaman POM</td> <td>23-24/03/2022</td> <td>20/09/2022</td> </tr> </tbody> </table> <p>The operating units maintain the records of accidents including JKKP 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 SHE Monthly Report. Details of accident report as below:</p> <p><u>Gajah Mati Estate</u></p> <p>Accident records were maintained and updated monthly at the estate. The JKKP 8 form have been submitted for the year ending 2021 on 06/02/2022 with reference number JKKP8/109906/2021. Late submission due to system down from MyKKP Portal as per evidence notice by DOSH dated 31/01/2022. There were 3 accidents recorded with 16 LTA. The accident investigation has been conducted accordingly and the JKKP 6 forms have been submitted to DOSH and available for verification. As for 2022 to date there were 3 accident cases in the estate. The JKKP 6 forms have been submitted to DOSH accordingly.</p> <p><u>Kemaman POM</u></p> <p>Accident records were maintained and updated monthly at the Mill. The JKKP 8 form have been submitted for the year ending 2021 on 27/01/2022 with reference number JKKP8/102684/2021. There were 2 accidents recorded with 12 LTA. The accident investigation has</p> | Estate/ Mill | First Aid Training date | Latest First Aid Monitoring Record | Gajah Mati Estate | 23-24/03/2022 | 07/10/2022 | Jernih Estate | 27/06/2022 | 19/09/2022 | Kemaman POM | 23-24/03/2022 | 20/09/2022 |  |
|-------------------|-------------------------|--|--------------|-------------------------|------------------------------------|-------------------|---------------|------------|---------------|------------|------------|-------------|---------------|------------|--|
| Estate/ Mill      | First Aid Training date | Latest First Aid Monitoring Record   |              |                         |                                    |                   |               |            |               |            |            |             |               |            |  |
| Gajah Mati Estate | 23-24/03/2022           | 07/10/2022   |              |                         |                                    |                   |               |            |               |            |            |             |               |            |  |
| Jernih Estate     | 27/06/2022              | 19/09/2022   |              |                         |                                    |                   |               |            |               |            |            |             |               |            |  |
| Kemaman POM       | 23-24/03/2022           | 20/09/2022   |              |                         |                                    |                   |               |            |               |            |            |             |               |            |  |

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|       |   |  |          |
|-------|---|--|----------|
|       |   | <p>been conducted accordingly and the JKKP 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 JKKP 6 forms have been submitted to DOSH accordingly.</p> <p><u>Jernih Estate</u></p> <p>Accident records were maintained and updated monthly at the estate. The JKKP 8 form have been submitted for the year ending 2021 on 25/01/2022 with reference number JKKP8/107174/2021. There were 1 accident recorded with 3 LTA. The accident investigation has been conducted accordingly and the JKKP 6 forms have been submitted to DOSH and available for verification. As for 2022 to date there were 1 accident cases in the estate. The JKKP 6 forms have been submitted to DOSH accordingly.</p>  |          |
| 6.7.3 | <p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p> | <p>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, TDMP-02/2021 dated 11/11/2021.</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 Harvesting Gang and visit to the stores of the respective estates and mill, it was sighted that all required PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</p> | Complied |

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| <p>6.7.4</p>      | <p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p> | <p>Medical care is provided to all the employees by the organization and covered by accident insurance. 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 571 1935 1070"> <thead> <tr> <th>Operating Unit</th> <th>Month</th> <th>Total Workers</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Gajah Mati Estate</td> <td>Jul 2022</td> <td>293</td> <td>RM12,359.50</td> </tr> <tr> <td>Aug 2022</td> <td>314</td> <td>RM13,497.10</td> </tr> <tr> <td>Sept 2022</td> <td>307</td> <td>RM13,159.10</td> </tr> <tr> <td rowspan="3">Jernih Estate</td> <td>Jul 2022</td> <td>148</td> <td>RM5,845.80</td> </tr> <tr> <td>Aug 2022</td> <td>157</td> <td>RM6,181.90</td> </tr> <tr> <td>Sept 2022</td> <td>156</td> <td>RM6,551.90</td> </tr> <tr> <td rowspan="3">Kemaman POM</td> <td>Jul 2022</td> <td>101</td> <td>RM5,556.50</td> </tr> <tr> <td>Aug 2022</td> <td>106</td> <td>RM5,546.10</td> </tr> <tr> <td>Sept 2022</td> <td>105</td> <td>RM5,614.60</td> </tr> </tbody> </table> | Operating Unit | Month | Total Workers | Amount | Gajah Mati Estate | Jul 2022 | 293             | RM12,359.50 | Aug 2022 | 314 | RM13,497.10 | Sept 2022 | 307 | RM13,159.10 | Jernih Estate | Jul 2022 | 148 | RM5,845.80 | Aug 2022 | 157 | RM6,181.90 | Sept 2022 | 156 | RM6,551.90 | Kemaman POM | Jul 2022 | 101 | RM5,556.50 | Aug 2022 | 106 | RM5,546.10 | Sept 2022 | 105 | RM5,614.60 | <p>Complied</p> |
|-------------------|--|---|----------------|-------|---------------|--------|-------------------|----------|-----------------|-------------|----------|-----|-------------|-----------|-----|-------------|---------------|----------|-----|------------|----------|-----|------------|-----------|-----|------------|-------------|----------|-----|------------|----------|-----|------------|-----------|-----|------------|-----------------|
| Operating Unit    | Month  | Total Workers   | Amount         |       |               |        |                   |          |                 |             |          |     |             |           |     |             |               |          |     |            |          |     |            |           |     |            |             |          |     |            |          |     |            |           |     |            |                 |
| Gajah Mati Estate | Jul 2022   | 293   | RM12,359.50    |       |               |        |                   |          |                 |             |          |     |             |           |     |             |               |          |     |            |          |     |            |           |     |            |             |          |     |            |          |     |            |           |     |            |                 |
|                   | Aug 2022   | 314   | RM13,497.10    |       |               |        |                   |          |                 |             |          |     |             |           |     |             |               |          |     |            |          |     |            |           |     |            |             |          |     |            |          |     |            |           |     |            |                 |
|                   | Sept 2022  | 307   | RM13,159.10    |       |               |        |                   |          |                 |             |          |     |             |           |     |             |               |          |     |            |          |     |            |           |     |            |             |          |     |            |          |     |            |           |     |            |                 |
| Jernih Estate     | Jul 2022   | 148   | RM5,845.80     |       |               |        |                   |          |                 |             |          |     |             |           |     |             |               |          |     |            |          |     |            |           |     |            |             |          |     |            |          |     |            |           |     |            |                 |
|                   | Aug 2022   | 157   | RM6,181.90     |       |               |        |                   |          |                 |             |          |     |             |           |     |             |               |          |     |            |          |     |            |           |     |            |             |          |     |            |          |     |            |           |     |            |                 |
|                   | Sept 2022  | 156   | RM6,551.90     |       |               |        |                   |          |                 |             |          |     |             |           |     |             |               |          |     |            |          |     |            |           |     |            |             |          |     |            |          |     |            |           |     |            |                 |
| Kemaman POM       | Jul 2022   | 101   | RM5,556.50     |       |               |        |                   |          |                 |             |          |     |             |           |     |             |               |          |     |            |          |     |            |           |     |            |             |          |     |            |          |     |            |           |     |            |                 |
|                   | Aug 2022   | 106   | RM5,546.10     |       |               |        |                   |          |                 |             |          |     |             |           |     |             |               |          |     |            |          |     |            |           |     |            |             |          |     |            |          |     |            |           |     |            |                 |
|                   | Sept 2022  | 105   | RM5,614.60     |       |               |        |                   |          |                 |             |          |     |             |           |     |             |               |          |     |            |          |     |            |           |     |            |             |          |     |            |          |     |            |           |     |            |                 |
| <p>6.7.5</p>      | <p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>  | <p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2021 and 2022 as reported to DOSH as follows:</p> <table border="1" data-bbox="1137 1315 1935 1366"> <thead> <tr> <th>Operating Unit</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>  | Operating Unit | 2021  | 2022          |        |                   |          | <p>Complied</p> |             |          |     |             |           |     |             |               |          |     |            |          |     |            |           |     |            |             |          |     |            |          |     |            |           |     |            |                 |
| Operating Unit    | 2021   | 2022  |                |       |               |        |                   |          |                 |             |          |     |             |           |     |             |               |          |     |            |          |     |            |           |     |            |             |          |     |            |          |     |            |           |     |            |                 |
|                   |  |   |                |       |               |        |                   |          |                 |             |          |     |             |           |     |             |               |          |     |            |          |     |            |           |     |            |             |          |     |            |          |     |            |           |     |            |                 |

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|   |  | Cases  | Days | Cases | Days |          |
|---|--|--|------|-------|------|----------|
|   |  | Gajah Mati Estate  | 3    | 16    | 18   | 76       |
|   |  | Jernih Estate  | 1    | 3     | 1    | 44       |
|   |  | Kemaman POM  | 2    | 12    | 2    | 10       |
| * Death case is categorized as loss of 6000 days.   |  |  |      |       |      |          |
| <b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b>  |  |  |      |       |      |          |
| <b>Criterion 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques. |  |  |      |       |      |          |
| 7.1.1   | <p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p> | <p>The estates has established Integrated Pest Management focusing on controlling the pest infestation such as rat. The effectiveness of IPM plan was implemented and monitored through rat damage and barn owl census every 6 month. Grading by mill on rat damage from FFB sent also indicates the effectiveness of IPM plan in the estate. Among the plan established as follows:</p> <ol style="list-style-type: none"> <li>1. Rat damage census</li> <li>2. Rat baiting program</li> <li>3. Barn owl census</li> <li>4. Maintenance of barn owl box</li> <li>5. Beneficial plant planting program</li> </ol> <p>The estates conducted rat baiting campaign once every 6 months. Reviewed the latest records of rat baiting conducted in July and August 2022 for both estates sampled in Estate Monthly Report for the month of August 2022.</p> <p>Even though that barn own has been placed as per ratio, Rat baiting was still required to ensure the rat damage was below than threshold level. The management also planned to increase the ratio of barn owl/ha in 2023.</p> |      |       |      | Complied |

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|---|--|--|----------|
|   |  | <p>The estate conducted barn owl census once every 2 months. Reviewed the latest census conducted in August 2022 in Estate Monthly Report for the month of August 2022.</p> <p>The estates planted beneficial plants such as <i>Turnera subulata</i>, <i>Cassia coganensis</i>, <i>Antigonon leptopus</i>, along the roadsides and designated points in the fields and also within the nursery perimeter. To develop beneficial plant nursery comprised of the beneficial plant.</p>   |          |
| 7.1.2   | <p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>                              | <p>This is not practiced in the estates sampled. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.</p>   | Complied |
| 7.1.3   | <p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p> | <p>There was no land preparation by burning ever since TDM practiced zero burning as per the policy in:</p> <p>a) TDM P01-SOP-Section 01/2011 - Under felling/clearing &amp; land preparation</p> <p>b) Carbon Policy</p> <p>TDM has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p> | Complied |
| <b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment. |  |  |          |
| 7.2.1   | <p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>               | <p>TDM Plantation Sdn Bhd has established the Agrochemical Management Policy dated 1/7/2020 signed by the CEO. The written justification in Standard Operating Procedure (SOP) of all agrochemical are available. The quantity of agrochemicals required</p>   | Complied |

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|              |  | <p>for various field conditions are documented and justified in Standard Operating Procedure below:</p> <ul style="list-style-type: none"> <li>• A11 – Immature Weeding dated March 2020</li> <li>• A12 – Mature Weeding dated May 2017</li> <li>• A13 – Control of Pest &amp; Insects dated March 2020</li> <li>• A14 – Rat Baiting dated March 2020</li> </ul> <p>TDM Plantation Sdn Bhd has established SOP on Chemical Management. Refer SOP Chemical Management dated 01/09/2017 Edition TDM/01 Rev. TDMP-01/2017.</p>  |       |                   |               |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |                 |
|--------------|--|--|-------|-------------------|---------------|-----|------|------|-----|------|------|-----|------|------|-----|------|------|-----|------|------|-----|------|------|-----|------|------|-----|------|------|-----|------|------|-----------------|
| <p>7.2.2</p> | <p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.<br/>- 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 879 1928 1375"> <thead> <tr> <th>Month</th> <th>Gajah Mati Estate</th> <th>Jernih Estate</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>0.02</td> <td>0.13</td> </tr> <tr> <td>Feb</td> <td>0.12</td> <td>0.06</td> </tr> <tr> <td>Mar</td> <td>0.17</td> <td>0.07</td> </tr> <tr> <td>Apr</td> <td>0.16</td> <td>0.05</td> </tr> <tr> <td>May</td> <td>0.13</td> <td>0.04</td> </tr> <tr> <td>Jun</td> <td>0.12</td> <td>0.04</td> </tr> <tr> <td>Jul</td> <td>0.13</td> <td>0.05</td> </tr> <tr> <td>Aug</td> <td>0.15</td> <td>0.07</td> </tr> <tr> <td>Sep</td> <td>0.12</td> <td>0.07</td> </tr> </tbody> </table> | Month | Gajah Mati Estate | Jernih Estate | Jan | 0.02 | 0.13 | Feb | 0.12 | 0.06 | Mar | 0.17 | 0.07 | Apr | 0.16 | 0.05 | May | 0.13 | 0.04 | Jun | 0.12 | 0.04 | Jul | 0.13 | 0.05 | Aug | 0.15 | 0.07 | Sep | 0.12 | 0.07 | <p>Complied</p> |
| Month        | Gajah Mati Estate  | Jernih Estate  |       |                   |               |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |                 |
| Jan          | 0.02   | 0.13   |       |                   |               |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |                 |
| Feb          | 0.12   | 0.06   |       |                   |               |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |                 |
| Mar          | 0.17   | 0.07   |       |                   |               |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |                 |
| Apr          | 0.16   | 0.05   |       |                   |               |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |                 |
| May          | 0.13   | 0.04   |       |                   |               |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |                 |
| Jun          | 0.12   | 0.04   |       |                   |               |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |                 |
| Jul          | 0.13   | 0.05   |       |                   |               |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |                 |
| Aug          | 0.15   | 0.07   |       |                   |               |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |                 |
| Sep          | 0.12   | 0.07   |       |                   |               |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |                 |

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| 7.2.3 | <p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.<br/>         - Critical (Major) compliance -</p>   | <p>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 its place, alternatives such as Glyphosate is used instead.</p>  | Complied |
| 7.2.4 | <p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.<br/>         - Minor compliance -</p>   | <p>No evidence of prophylactic use of pesticides in the estates visited as per Register of Chemicals Hazardous to Health for all estates visited.</p>  | Complied |
| 7.2.5 | <p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.<br/>         The due diligence refers to:<br/>         a) Judgment of the threat and verify why this is a major threat<br/>         b) Why there is no other alternative which can be used<br/>         c) Which process was applied to verify why there is no other less hazardous alternative<br/>         d) What is the process to limit the negative impacts of the application<br/>         e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.<br/>         - Minor compliance -</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.<br/>         The register showed that only class II, III &amp; 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. As for usage of highly toxic/limited pesticides, the estates acquired permit from Department of Agriculture.</p> | Complied |

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| <p>7.2.6</p>                                | <p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.<br/>         - 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><u>Gajah Mati Estate</u></p> <table border="1" data-bbox="1137 708 1912 858"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>SOP Spraying Training</td> <td>14/06/2022</td> </tr> <tr> <td>Integrated Pest Management</td> <td>10/10/2021</td> </tr> </tbody> </table> <p><u>Kemaman POM</u></p> <table border="1" data-bbox="1137 906 1912 1056"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Spillage Kit and Chemical Handling Training</td> <td>18/10/2022</td> </tr> <tr> <td>Chemical handling Hexane</td> <td>25/05/2022</td> </tr> </tbody> </table> <p><u>Jernih Estate</u></p> <table border="1" data-bbox="1137 1104 1912 1254"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Chemical Calibration and Weed Management</td> <td>11/10/2022</td> </tr> <tr> <td>Triple Rinsing &amp; Premix Training</td> <td>20/03/2022</td> </tr> </tbody> </table> | Training        | Date | SOP Spraying Training | 14/06/2022 | Integrated Pest Management | 10/10/2021 | Training | Date | Spillage Kit and Chemical Handling Training | 18/10/2022 | Chemical handling Hexane | 25/05/2022 | Training | Date | Chemical Calibration and Weed Management | 11/10/2022 | Triple Rinsing & Premix Training | 20/03/2022 | <p>Complied</p> |
|---|--|---|-----------------|------|-----------------------|------------|----------------------------|------------|----------|------|---|------------|--------------------------|------------|----------|------|--|------------|----------------------------------|------------|-----------------|
| Training                                    | Date   |   |                 |      |                       |            |                            |            |          |      |   |            |                          |            |          |      |  |            |                                  |            |                 |
| SOP Spraying Training                       | 14/06/2022   |   |                 |      |                       |            |                            |            |          |      |   |            |                          |            |          |      |  |            |                                  |            |                 |
| Integrated Pest Management                  | 10/10/2021   |   |                 |      |                       |            |                            |            |          |      |   |            |                          |            |          |      |  |            |                                  |            |                 |
| Training                                    | Date   |   |                 |      |                       |            |                            |            |          |      |   |            |                          |            |          |      |  |            |                                  |            |                 |
| Spillage Kit and Chemical Handling Training | 18/10/2022   |   |                 |      |                       |            |                            |            |          |      |   |            |                          |            |          |      |  |            |                                  |            |                 |
| Chemical handling Hexane                    | 25/05/2022   |   |                 |      |                       |            |                            |            |          |      |   |            |                          |            |          |      |  |            |                                  |            |                 |
| Training                                    | Date   |   |                 |      |                       |            |                            |            |          |      |   |            |                          |            |          |      |  |            |                                  |            |                 |
| Chemical Calibration and Weed Management    | 11/10/2022   |   |                 |      |                       |            |                            |            |          |      |   |            |                          |            |          |      |  |            |                                  |            |                 |
| Triple Rinsing & Premix Training            | 20/03/2022   |   |                 |      |                       |            |                            |            |          |      |   |            |                          |            |          |      |  |            |                                  |            |                 |
| <p>7.2.7</p>                                | <p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.<br/>         - 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</p>  | <p>Complied</p> |      |                       |            |                            |            |          |      |   |            |                          |            |          |      |  |            |                                  |            |                 |

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|        |   | 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.  |          |
| 7.2.8  | All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.<br>- Minor compliance -  | Empty Pesticides Containers were triple rinse and reuse back as pre-mix chemical container. The estate maintain the inventory records of empty pesticides containers recorded in Scheduled Record Book and reported to DOE through ESWISS. The empty containers was disposed as Scheduled waste. Reviewed the latest disposal records as follows:<br>Gajah Mati Estate – 30/08/2022, Consignment Note: 2022083012W4ET13, 0.3796 MT via Pentas Flora (Kelantan) Sdn Bhd.<br>Jernih Estate – 25/10/2022, Consignment Note: 2022102516G0EWNH, 0.0600 MT via Pentas Flora (Kelantan) Sdn Bhd. | Complied |
| 7.2.9  | <b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.<br>- Critical (Major) compliance - | No evidence of aerial spray conducted at the estate visited.  | Complied |
| 7.2.10 | <b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.<br>- Critical (Major) compliance -  | 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   | Complied |

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|  |   | <p>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> <p>Gajah Mati Estate - Medical Surveillance was conducted by Klinik Medic Bestari Paka on 16/07, 07/08, and 29/08/2022 for 20 workers those deemed to be exposed to Chemicals and Fumes. 2 workers were retest on 13/10/2022 and report were yet to receive.</p> <p>Kemaman POM - Medical Surveillance was conducted by Klinik Nabilah on 25/05, 26/05 and 28/05/2022 for 15 workers those deemed to be exposed to Chemicals and Manganese and result indicates that all workers were have normal results.</p> <p>Jernih Estate - Medical Surveillance was conducted by Klinik Medic Bestari Paka on 07-08/06/2022 for 13 workers those deemed to be exposed to Chemicals. Report indicates that all workers were fit to work and continue with annual medical surveillance.</p> |          |
| 7.2.11   | <p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p> | <p>The estates visited has issued Internal Memorandum on prohibition of pregnant or breastfeeding women or other people that have medical restrictions to work as pesticides operator.</p> <p>The memorandum has been displayed at several information board in the estate and communicated to the workers during training and morning briefing.</p> <p>There is no female workers work as a chemical handler.</p>   | Complied |
| <p><b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p> |   |  |          |

| <p>7.3.1</p>     | <p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>   | <p>The estates and mill have identified the waste products and source pollution generated in the estates and mill. The waste are categorized as follows:</p> <p>Estates</p> <table border="1" data-bbox="1137 515 1937 949"> <thead> <tr> <th>Type</th> <th>Item Description</th> </tr> </thead> <tbody> <tr> <td>Scheduled Waste</td> <td>SW 102 – Waste of lead acid batteries<br/>SW 305 – spent lubricant<br/>SW 306 – spent hydraulic oil<br/>SW 410 – rags, plastics, papers, contaminated filters<br/>SW 404 – Clinical waste<br/>SW 409 – empty chemical containers</td> </tr> <tr> <td>Domestic waste</td> <td>Rubbish</td> </tr> <tr> <td>Industrial waste</td> <td>Scrap metal<br/>EFB</td> </tr> </tbody> </table> <p>Mill</p> <table border="1" data-bbox="1137 999 1937 1377"> <thead> <tr> <th>Type</th> <th>Item Description</th> </tr> </thead> <tbody> <tr> <td>Scheduled Waste</td> <td>SW 102 – Waste of lead acid batteries<br/>SW 110 – Fluorescent tube/lamp<br/>SW 305 – spent lubricant<br/>SW 410 – rags, plastics, papers, contaminated filters<br/>SW 322 – Waste of non-halogenated organic<br/>SW 409 – empty chemical containers</td> </tr> <tr> <td>Domestic waste</td> <td>Rubbish</td> </tr> <tr> <td>Industrial waste</td> <td>Scrap metal</td> </tr> </tbody> </table> | Type | Item Description | Scheduled Waste | SW 102 – Waste of lead acid batteries<br>SW 305 – spent lubricant<br>SW 306 – spent hydraulic oil<br>SW 410 – rags, plastics, papers, contaminated filters<br>SW 404 – Clinical waste<br>SW 409 – empty chemical containers | Domestic waste | Rubbish | Industrial waste | Scrap metal<br>EFB | Type | Item Description | Scheduled Waste | SW 102 – Waste of lead acid batteries<br>SW 110 – Fluorescent tube/lamp<br>SW 305 – spent lubricant<br>SW 410 – rags, plastics, papers, contaminated filters<br>SW 322 – Waste of non-halogenated organic<br>SW 409 – empty chemical containers | Domestic waste | Rubbish | Industrial waste | Scrap metal | <p>Complied</p> |
|------------------|---|--|------|------------------|-----------------|---|----------------|---------|------------------|--------------------|------|------------------|-----------------|---|----------------|---------|------------------|-------------|-----------------|
| Type             | Item Description  |  |      |                  |                 |   |                |         |                  |                    |      |                  |                 |   |                |         |                  |             |                 |
| Scheduled Waste  | SW 102 – Waste of lead acid batteries<br>SW 305 – spent lubricant<br>SW 306 – spent hydraulic oil<br>SW 410 – rags, plastics, papers, contaminated filters<br>SW 404 – Clinical waste<br>SW 409 – empty chemical containers                     |  |      |                  |                 |   |                |         |                  |                    |      |                  |                 |   |                |         |                  |             |                 |
| Domestic waste   | Rubbish   |  |      |                  |                 |   |                |         |                  |                    |      |                  |                 |   |                |         |                  |             |                 |
| Industrial waste | Scrap metal<br>EFB  |  |      |                  |                 |   |                |         |                  |                    |      |                  |                 |   |                |         |                  |             |                 |
| Type             | Item Description  |  |      |                  |                 |   |                |         |                  |                    |      |                  |                 |   |                |         |                  |             |                 |
| Scheduled Waste  | SW 102 – Waste of lead acid batteries<br>SW 110 – Fluorescent tube/lamp<br>SW 305 – spent lubricant<br>SW 410 – rags, plastics, papers, contaminated filters<br>SW 322 – Waste of non-halogenated organic<br>SW 409 – empty chemical containers |  |      |                  |                 |   |                |         |                  |                    |      |                  |                 |   |                |         |                  |             |                 |
| Domestic waste   | Rubbish   |  |      |                  |                 |   |                |         |                  |                    |      |                  |                 |   |                |         |                  |             |                 |
| Industrial waste | Scrap metal   |  |      |                  |                 |   |                |         |                  |                    |      |                  |                 |   |                |         |                  |             |                 |

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|  |   | <table border="1" data-bbox="1137 363 1939 542"> <tr> <td data-bbox="1137 363 1370 542"></td> <td data-bbox="1370 363 1939 542">                     EFB<br/>                     POME<br/>                     Fiber<br/>                     Ash Boiler<br/>                     Shell                 </td> </tr> </table> <p>The operating units has established waste management plan and reviewed on annually basis. reviewed the implementation of the management plan as follows:</p> <p>Gajah Mati Estate</p> <ol style="list-style-type: none"> <li>1. The estate maintain the inventory records of scheduled waste generated by the estate recorded in BIN Card. The inventory was reported to DOE through ESWISS. Reviewed the inventory records for the month of January – September 2022.</li> <li>2. The empty container was triple rinsed and puncture and stored at designated place under locked and key. The empty pesticides container was disposed as scheduled waste, 409. Reviewed the disposal records dated 30/08/2022.</li> </ol> <p>Kemaman POM</p> <ol style="list-style-type: none"> <li>1. The mill maintain the inventory records of scheduled waste generated by the estate recorded in BIN Card. The inventory was reported to DOE through ESWISS. Reviewed the inventory records for the month of January – September 2022.</li> <li>2. Domestic waste was collected 3 times a week and disposed through designated landfill at Pelantoh Estate. Reviewed the domestic waste disposal records FY 2022 as todate December 2022.</li> <li>3. Empty fruit bunch was disposed through field application and raw material for bio compost production at ratio of 20% : 80%.</li> </ol> |  | EFB<br>POME<br>Fiber<br>Ash Boiler<br>Shell |  |
|  | EFB<br>POME<br>Fiber<br>Ash Boiler<br>Shell |   |  |   |  |

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|       |   | <p>Reviewed the disposal records for the month of January – September 2022.</p> <p>Jernih Estate</p> <ol style="list-style-type: none"> <li>1. The estate continuously promoted 3R (Reduce, Reuse, Recycle) program to the workers. The recycle waste bin was placed at designated area at the office and housing area. The collection and disposal of recycle waste was recorded in Recycle Waste record book. Reviewed the disposal records for the month of April, May, June, July and August 2022.</li> <li>2. The estate maintain the inventory of empty chemical containers recorded in Empty Chemical Containers Storage and Disposal record book. Reviewed the inventory dated 22/10/2022.</li> <li>3. The empty container was triple rinsed and puncture and stored at designated place under locked and key. The empty pesticides container was disposed as scheduled waste, 409. Reviewed the disposal records dated 25/10/2022.</li> </ol> |          |
| 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>TDM Plantation has established SOP for handling scheduled waste and documented in Standard Operating procedure – Procedure for handling schedule waste dated 1/11/2008, edition TDMP/02 rev. TDMP – 02/2017.</p> <p>The certification units also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Stores for scheduled waste were inspected at both estate visited and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>The certification units maintain the inventory records of the Scheduled Waste generated and reported to DOE through ESWISS.</p>  | Complied |

|  |  |   |  |
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|  |  | <p>Waste disposal was conducted base on SOP and waste management plan established. Reviewed the implementation of the management plan as follows:</p> <p>Gajah Mati Estate</p> <ol style="list-style-type: none"> <li>1. The estate maintain the inventory records of scheduled waste generated by the estate recorded in BIN Card. The inventory was reported to DOE through ESWISS. Reviewed the inventory records for the month of January – September 2022.</li> <li>2. The empty container was triple rinsed and puncture and stored at designated place under locked and key. The empty pesticides container was disposed as scheduled waste, 409. Reviewed the disposal records dated 30/08/2022.</li> <li>3. The Scheduled Waste was disposed through licensed contractors, Pentas Flora Sdn. Bhd. Reviewed the consignment note as follows:             <ol style="list-style-type: none"> <li>a. 20/09/2022 for SW 404, C/N 2022092016QAELO4</li> <li>b. 30/08/2022 for SW 410, C/N 2022083011KYSJRN</li> <li>c. 30/08/2022 for SW 409, C/N 2022083012W4ETI3</li> <li>d. 30/08/2022 for SW 405, C/N 20220830112JLZKX</li> </ol> </li> </ol> <p>Kemaman POM</p> <ol style="list-style-type: none"> <li>1. The mill maintain the inventory records of scheduled waste generated by the estate recorded in BIN Card. The inventory was reported to DOE through ESWISS. Reviewed the inventory records for the month of January – September 2022.</li> <li>2. Domestic waste was collected 3 times a week and disposed through designated landfill at Pelantoh Estate. Reviewed the domestic waste disposal records FY 2022 as todate December 2022.</li> </ol> |  |
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|  |  | <p>3. Empty fruit bunch was disposed through field application and raw material for bio compost production at ratio of 20% : 80%. Reviewed the disposal records for the month of January – September 2022.</p> <p>4. The Scheduled Waste was disposed through licensed contractors, Pentas Flora Sdn. Bhd. Reviewed the consignment note as follows:</p> <ul style="list-style-type: none"> <li>a. 30/08/2022 for SW 410, C/N 2022083015PORK37</li> <li>b. 30/08/2022 for SW 322, C/N 2022083014HMTZ2R</li> <li>c. 30/08/2022 for SW 410, C/N 20220830158H0F4N</li> <li>d. 30/08/2022 for SW 305, C/N 2022083015VOF8XD</li> <li>e. 30/08/2022 for SW 410, C/N 20220830158H0F4N</li> <li>f. 30/08/2022 for SW 110, C/N 20220830175MJ1WE</li> </ul> <p>Jernih Estate</p> <p>1. The estate continuously promoted 3R (Reduce, Reuse, Recycle) program to the workers. The recycle waste bin was placed at designated area at the office and housing area. The collection and disposal of recycle waste was recorded in Recycle Waste record book. Reviewed the disposal records for the month of April, May, June, July and August 2022.</p> <p>2. The estate maintain the inventory of empty chemical containers recorded in Empty Chemical Containers Storage and Disposal record book. Reviewed the inventory dated 22/10/2022.</p> <p>3. The empty container was triple rinsed and puncture and stored at designated place under locked and key. The empty pesticides container was disposed as scheduled waste, 409. Reviewed the disposal records dated 25/10/2022.</p> <p>4. Domestic waste conducted twice a week and disposed at designated landfill located in field PM06A/2T. Noted during site</p> |
|--|--|--|

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|  |  | <p>visit, only domestic waste disposed in the landfill. Reviewed the domestic waste collection records and payment records for rubbish collection for the month of August, September and October 2022.</p> <p>5. The Scheduled Waste was disposed through licensed contractors, Pentas Flora Sdn. Bhd. Reviewed the consignment note as follows:</p> <ul style="list-style-type: none"> <li>a. 25/10/2022 for SW 305, C/N 2022102516A6NPYK</li> <li>b. 25/10/2022 for SW 409, C/N 2022102516G0EWNH</li> <li>c. 25/10/2022 for SW 410, C/N 2022102516VXG5JK</li> <li>d. 08/08/2022 for SW 305, C/N 2022080813TEK3AJ</li> <li>e. 08/08/2022 for SW 409, C/N 2022080813KD04GY</li> <li>f. 08/08/2022 for SW 410, C/N 2022080813TOQZLS</li> </ul> |          |
| 7.3.3  | <p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>  | <p>Domestic waste were collected twice a week and disposed at designated landfill. No evidence of fire use to dispose domestic waste at housing area.</p> <p>No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling &amp; chipping, cambering/land forming and path construction.</p>  | Complied |
| <b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield. |  |   |          |
| 7.4.1  | <p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p> | <p>Certification units continued to use and implement SOP for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOP were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOP.</p> <p>a) Standard Operating Procedures (SOP) 2011</p>  | Complied |

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|-------|--|---|----------|
|       |  | <p>b) "Guidelines On River Management"<br/> c) Pictorial Safety Standards and Security Guidelines (PSS).<br/> d) Laboratory Process Control Manual<br/> e) Security Guidelines<br/> f) SOP - Manuring 14 pages Rev 2017</p> <p>All the estates and mill operations were guided through the manuals and SOP. The procedures as documented in the manual and SOP were disseminated to the staff/workers through morning briefings and training. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The SOP included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.</p> |          |
| 7.4.2 | <p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.<br/> - Minor compliance -</p> | <p>Periodic tissue and soil sampling were carried out in the Estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. The aagronomic assessment and fertiliser recommendation was conducted by AAD (Agronomy and Advisory Department). Reviewed the leaf sampling records as follows:<br/> Gajah Mati Estate<br/> Latest leave sampling conducted in August 2022. Refer report no. LE/2022/08/123 dated 15/08/2022<br/> Latest soil sampling conducted in November 2021. Refer report no. SE/2021/12/109 dated 27/12/2021</p>   | Complied |

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|  |  | <p>Jerneh Estate</p> <p>Latest leave sampling conducted in May 2022. Refer report no. LE/2022/06/72 dated 03/06/2022</p> <p>Latest soil sampling conducted in November 2021. Refer report no. SE/2021/12/112 dated 27/12/2021</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>As nutrient cycle strategy, Empty fruit bunch was disposed through field application and raw material for bio compost production at ratio of 20% : 80%. Reviewed the disposal records for the month of January – September 2022.</p>  | Complied |             |                   |  |          |
| 7.4.4  | <p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>  | <p>The fertiliser application was conducted as per recommendation by agronomist base on foliar sampling conducted. The fertiliser application records was available at the estate visited for review. The estate reported the fertilised application to Head Office on monthly basis through Monthly Report. Reviewed the Monthly Report for the month of August 2022.</p>   | Complied |             |                   |  |          |
| <b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils. |  |  |          |             |                   |  |          |
| 7.5.1  | <p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>  | <p>The operating units has identified the soil series in the estates and established soil series maps. Soil series identified in the estates as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Estate</th> <th>Soil Series</th> </tr> </thead> <tbody> <tr> <td>Gajah Mati Estate</td> <td>Bungor (35.20%), Batu lapan - Padang Besar (2.73%), batu lapan (24.22%), Tuku (1.73%), Chempaka (5.96%), Kuala Brang (2.02%), Lubuk Itik – Binjai (12.11%), Lubuk Itik (0.55%), Lating (0.47%), Rengam (14.34%), Tebok – Tawar (0.21%), Telemong (0.45%)</td> </tr> </tbody> </table> | Estate   | Soil Series | Gajah Mati Estate | Bungor (35.20%), Batu lapan - Padang Besar (2.73%), batu lapan (24.22%), Tuku (1.73%), Chempaka (5.96%), Kuala Brang (2.02%), Lubuk Itik – Binjai (12.11%), Lubuk Itik (0.55%), Lating (0.47%), Rengam (14.34%), Tebok – Tawar (0.21%), Telemong (0.45%) | Complied |
| Estate   | Soil Series  |  |          |             |                   |  |          |
| Gajah Mati Estate  | Bungor (35.20%), Batu lapan - Padang Besar (2.73%), batu lapan (24.22%), Tuku (1.73%), Chempaka (5.96%), Kuala Brang (2.02%), Lubuk Itik – Binjai (12.11%), Lubuk Itik (0.55%), Lating (0.47%), Rengam (14.34%), Tebok – Tawar (0.21%), Telemong (0.45%) |  |          |             |                   |  |          |

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|               |   |  |               |   |  |
|---------------|---|--|---------------|---|--|
|               |   | <table border="1"> <tr> <td>Jerneh Estate</td> <td>Awang (1.04%), Bungor (30.09%), Bukit Tuku (3.17%), Penambang (0.84%), Rengam – Tai Tak (15.98%), Rengam (26.63%), Steep (22.26%)</td> </tr> </table>   | Jerneh Estate | Awang (1.04%), Bungor (30.09%), Bukit Tuku (3.17%), Penambang (0.84%), Rengam – Tai Tak (15.98%), Rengam (26.63%), Steep (22.26%) |  |
| Jerneh Estate | Awang (1.04%), Bungor (30.09%), Bukit Tuku (3.17%), Penambang (0.84%), Rengam – Tai Tak (15.98%), Rengam (26.63%), Steep (22.26%)   |  |               |   |  |
| 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>TDM Plantations has established Slope Protection and River Buffer Zone Policy signed by the CEO dated 01/04/2021. In the policy stated as follows:</p> <ol style="list-style-type: none"> <li>1. For area with slope more than 25° must be excluded from new planting development and replanting program.</li> <li>2. For area with slopes less than 25 degrees, existing crops and plants should be properly maintained.</li> </ol> <p>The estates sampled continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ol style="list-style-type: none"> <li>a) Slope &amp; River Protection Policy dated 01/04/2021.</li> <li>b) Buffer Zone &amp; 25-degree slope SOP</li> <li>c) Land Preparation for Terracing in SOP Section 3.5 ref TDMP01</li> </ol> | Complied      |   |  |
| 7.5.3         | <p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>   | <p>TDM Plantations has established Slope Protection and River Buffer Zone Policy signed by the CEO dated 1/7/2020. In the policy stated as follows:</p> <ol style="list-style-type: none"> <li>1. For area with slope more than 25° must be excluded from new planting development and replanting program.</li> </ol>  | Complied      |   |  |

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|   |  | <p>2. For area with slopes less than 25 degrees, existing crops and plants should be properly maintained.</p> <p>No new planting or land clearing conducted in the certification units since 15/11/2018.</p>  |           |                   |               |         |        |       |         |        |       |          |        |        |           |        |        |          |
|---|--|---|-----------|-------------------|---------------|---------|--------|-------|---------|--------|-------|----------|--------|--------|-----------|--------|--------|----------|
| <p><b>Criterion 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p> |  |   |           |                   |               |         |        |       |         |        |       |          |        |        |           |        |        |          |
| 7.6.1   | <p><b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p> | <p>Soil surveys are made and available in a soil map for both the estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates.</p>   | Complied  |                   |               |         |        |       |         |        |       |          |        |        |           |        |        |          |
| 7.6.2   | <p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>  | <p>TDM Plantation Sdn. Bhd. group estates had no planting on areas of more than 25 degree. Plantings on steep slope are either avoided or minimized.</p>  | Complied  |                   |               |         |        |       |         |        |       |          |        |        |           |        |        |          |
| 7.6.3   | <p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>   | <p>Soil surveys are made and available in a soil map at the estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates. Details as per 7.5.1 and 7.5.2.</p> <p>Slope maps and information was available for review at estates visited.</p> <table border="1"> <thead> <tr> <th>Elevation</th> <th>Gajah Mati Estate</th> <th>Jerneh Estate</th> </tr> </thead> <tbody> <tr> <td>0° - 2°</td> <td>19.12%</td> <td>5.96%</td> </tr> <tr> <td>3° - 6°</td> <td>26.31%</td> <td>0.00%</td> </tr> <tr> <td>7° - 12°</td> <td>28.61%</td> <td>14.51%</td> </tr> <tr> <td>13° - 20°</td> <td>18.29%</td> <td>77.79%</td> </tr> </tbody> </table> | Elevation | Gajah Mati Estate | Jerneh Estate | 0° - 2° | 19.12% | 5.96% | 3° - 6° | 26.31% | 0.00% | 7° - 12° | 28.61% | 14.51% | 13° - 20° | 18.29% | 77.79% | Complied |
| Elevation   | Gajah Mati Estate  | Jerneh Estate   |           |                   |               |         |        |       |         |        |       |          |        |        |           |        |        |          |
| 0° - 2°   | 19.12%   | 5.96%   |           |                   |               |         |        |       |         |        |       |          |        |        |           |        |        |          |
| 3° - 6°   | 26.31%   | 0.00%   |           |                   |               |         |        |       |         |        |       |          |        |        |           |        |        |          |
| 7° - 12°  | 28.61%   | 14.51%  |           |                   |               |         |        |       |         |        |       |          |        |        |           |        |        |          |
| 13° - 20°   | 18.29%   | 77.79%  |           |                   |               |         |        |       |         |        |       |          |        |        |           |        |        |          |

|  |  |  |       |       |          |  |
|--|--|--|-------|-------|----------|--|
|  |  | 21° - 25°  | 4.14% | 0.00% |          |  |
|  |  | > 25°  | 3.53% | 1.74% |          |  |
| <b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly. |  |  |       |       |          |  |
| 7.7.1  | <b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.<br>- Critical (Major) compliance -   | There is no peat soil or soil categorized as marginal or fragile soil in all estates sampled. There was also no new planting in the estates. |       |       | Complied |  |
| 7.7.2  | Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.<br><b>PROCEDURAL NOTE:</b><br>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).<br>- Minor compliance -  | There is no peat soil or soil categorized as marginal or fragile soil in all estates sampled. There was also no new planting in the estates. |       |       | Complied |  |
| 7.7.3  | <b>(C)</b> Subsidence of peat is monitored, documented and minimised.<br>- Critical (Major) compliance -   | There is no peat soil or soil categorized as marginal or fragile soil in all estates sampled. There was also no new planting in the estates. |       |       | Complied |  |
| 7.7.4  | <b>(C)</b> A documented water and ground cover management programme is in place.<br>- Critical (Major) compliance -  | There is no peat soil or soil categorized as marginal or fragile soil in all estates sampled. There was also no new planting in the estates. |       |       | Complied |  |
| 7.7.5  | <b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with | There is no peat soil or soil categorized as marginal or fragile soil in all estates sampled. There was also no new planting in the estates. |       |       | Complied |  |

|   |  |   |          |
|---|--|---|----------|
|   | <p>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>  |   |          |
| 7.7.6   | <p><b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>  | There is no peat soil or soil categorized as marginal or fragile soil in all estates sampled. There was also no new planting in the estates.  | Complied |
| 7.7.7   | <p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p> | There is no peat soil or soil categorized as marginal or fragile soil in all estates sampled. There was also no new planting in the estates.  | Complied |
| <b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater. |  |   |          |
| 7.8.1   | <p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p>  | <p>The certification units has established water management plan for year 2022. The management plan focus on action to reduce water usage, water shortage/ Dry spell and severe water pollution.</p> <p>Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> <li>To reduce water usage, the estates and mill has placed large containers at several strategic places to collect rain water. Sighted the rainwater collection container at workshop area</li> </ol> | Complied |

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|              | <p>- Minor compliance -</p>  | <p>used for washing tractor and bio compost plan used for watering plant.</p> <ol style="list-style-type: none"> <li>2. To ensure that estates activities doesn't have negative impacts to the natural water course, the estates conducted upstream and downstream water sampling on annually basis. Latest water sampling was conducted on 19/09/2022. The report has yet to be received by the estate.</li> <li>3. The mill and estates monitor the water usage on monthly basis. Reviewed the records for the month of January – September 2022.</li> </ol> <p>The workers were provided with adequate access to clean water supplied by the Syarikat Air Terengganu.</p>  |    |             |             |   |             |           |   |                |           |                 |
|--------------|--|---|----|-------------|-------------|---|-------------|-----------|---|----------------|-----------|-----------------|
| <p>7.8.2</p> | <p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p> | <p>The estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing TDM policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones.</p> <p>No evidence of chemical application at the buffer zone area. Sighted the vegetation along the area was well growth. For replanting area, the last row old palm adjacent to the buffer zone area was left out.</p> <p>Policy signed by the CEO dated 01/04/2021. In the policy stated that river buffer zone must be maintained at both side of river bank as per schedule below:</p> <table border="1" data-bbox="1144 1241 1944 1393"> <thead> <tr> <th>No</th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>&gt; 40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> </tbody> </table> | No | River width | Buffer zone | 1 | > 40 meters | 50 meters | 2 | 20 - 40 meters | 40 meters | <p>Complied</p> |
| No           | River width  | Buffer zone   |    |             |             |   |             |           |   |                |           |                 |
| 1            | > 40 meters  | 50 meters   |    |             |             |   |             |           |   |                |           |                 |
| 2            | 20 - 40 meters   | 40 meters   |    |             |             |   |             |           |   |                |           |                 |

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|         |  | <table border="1" data-bbox="1144 362 1944 518"> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>&lt; 5 meters</td> <td>5 meters</td> </tr> </table> <p>Gajah Mati Estate<br/> The estate clearly demarcated the riparian buffer zone for river flow through the estate with white and blue ring at palm trunks along the buffer zone as sighted at field P 18B1, buffer zone for Sungai Besul. No evidence of chemical application along the area.</p> <p>The estate conducted water sampling for river flow through the estate on annually basis. Latest water sampling was conducted on 19/09/2022. The report has yet to be received by the estate.</p> <p>Jerneh Estate<br/> The estate demarcated the riparian buffer zone with blue and white pole as sighted in field PM 05A/1T, buffer zone for Sungai Kijing. No evidence of chemical application along the area.</p> <p>The estate conducted water sampling for river flow through the estate on annually basis. Latest water sampling was conducted on 23/08/2022. The results was in compliance to Class IIA/IIB of National Water Quality Standards for Malaysia.</p> | 3     | 10 - 20 meters | 20 meters | 4       | 5 - 10 meters | 10 meters | 5        | < 5 meters | 5 meters |  |
|---------|--|--|-------|----------------|-----------|---------|---------------|-----------|----------|------------|----------|--|
| 3       | 10 - 20 meters   | 20 meters  |       |                |           |         |               |           |          |            |          |  |
| 4       | 5 - 10 meters  | 10 meters  |       |                |           |         |               |           |          |            |          |  |
| 5       | < 5 meters   | 5 meters   |       |                |           |         |               |           |          |            |          |  |
| 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 through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE accordingly. Reviewed the Quarterly Return Form to DOE as follows:</p> <p>1<sup>st</sup> quarter 2022:</p> <table border="1" data-bbox="1144 1281 1693 1377"> <thead> <tr> <th>Month</th> <th>Parameter</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>BOD</td> <td>29.00</td> </tr> </tbody> </table>  | Month | Parameter      | Results   | January | BOD           | 29.00     | Complied |            |          |  |
| Month   | Parameter  | Results  |       |                |           |         |               |           |          |            |          |  |
| January | BOD  | 29.00  |       |                |           |         |               |           |          |            |          |  |

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|--|--|-------------------------------|-----------|---------|--|--|--|
|  |  |                               | pH        | 8.20    |  |  |  |
|  |  | February                      | BOD       | 29.00   |  |  |  |
|  |  |                               | pH        | 7.80    |  |  |  |
|  |  | March                         | BOD       | 14.00   |  |  |  |
|  |  |                               | pH        | 7.30    |  |  |  |
|  |  | 2 <sup>nd</sup> quarter 2022: |           |         |  |  |  |
|  |  | Month                         | Parameter | Results |  |  |  |
|  |  | April                         | BOD       | 16.00   |  |  |  |
|  |  |                               | pH        | 8.10    |  |  |  |
|  |  | May                           | BOD       | 28.00   |  |  |  |
|  |  |                               | pH        | 8.10    |  |  |  |
|  |  | June                          | BOD       | 50.00   |  |  |  |
|  |  |                               | pH        | 8.20    |  |  |  |
|  |  | 3 <sup>rd</sup> quarter 2022: |           |         |  |  |  |
|  |  | Month                         | Parameter | Results |  |  |  |
|  |  | July                          | BOD       | 28.00   |  |  |  |
|  |  |                               | pH        | 8.40    |  |  |  |
|  |  | August                        | BOD       | 31.00   |  |  |  |
|  |  |                               | pH        | 8.10    |  |  |  |
|  |  | September                     | BOD       | 21.00   |  |  |  |

|         |  | pH   | 7.90 |  |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |     |     |      |     |     |      |     |         |      |      |          |
|---------|--|--|------|--|------|------|-----|------|------|-----|------|------|-----|------|------|-----|------|------|-----|------|------|-----|------|------|-----|------|------|-----|------|------|-----|------|------|-----|------|-----|-----|------|-----|-----|------|-----|---------|------|------|----------|
| 7.8.4   | Mill water use per tonne of FFB is monitored and recorded.<br>- Minor compliance - | <p>The mill monitors the water consumption/FFB on monthly basis. Reviewed the monitoring records as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>2.12</td> <td>1.98</td> </tr> <tr> <td>Feb</td> <td>2.03</td> <td>2.31</td> </tr> <tr> <td>Mar</td> <td>1.98</td> <td>1.99</td> </tr> <tr> <td>Apr</td> <td>2.02</td> <td>1.97</td> </tr> <tr> <td>May</td> <td>2.00</td> <td>1.98</td> </tr> <tr> <td>Jun</td> <td>1.97</td> <td>1.99</td> </tr> <tr> <td>Jul</td> <td>1.95</td> <td>1.99</td> </tr> <tr> <td>Aug</td> <td>2.01</td> <td>1.96</td> </tr> <tr> <td>Sep</td> <td>1.99</td> <td>1.98</td> </tr> <tr> <td>Oct</td> <td>1.98</td> <td>N/A</td> </tr> <tr> <td>Nov</td> <td>1.96</td> <td>N/A</td> </tr> <tr> <td>Dec</td> <td>1.89</td> <td>N/A</td> </tr> <tr> <td>Average</td> <td>1.99</td> <td>2.02</td> </tr> </tbody> </table> |      |  | 2021 | 2022 | Jan | 2.12 | 1.98 | Feb | 2.03 | 2.31 | Mar | 1.98 | 1.99 | Apr | 2.02 | 1.97 | May | 2.00 | 1.98 | Jun | 1.97 | 1.99 | Jul | 1.95 | 1.99 | Aug | 2.01 | 1.96 | Sep | 1.99 | 1.98 | Oct | 1.98 | N/A | Nov | 1.96 | N/A | Dec | 1.89 | N/A | Average | 1.99 | 2.02 | Complied |
|         | 2021   | 2022   |      |  |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |     |     |      |     |     |      |     |         |      |      |          |
| Jan     | 2.12   | 1.98   |      |  |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |     |     |      |     |     |      |     |         |      |      |          |
| Feb     | 2.03   | 2.31   |      |  |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |     |     |      |     |     |      |     |         |      |      |          |
| Mar     | 1.98   | 1.99   |      |  |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |     |     |      |     |     |      |     |         |      |      |          |
| Apr     | 2.02   | 1.97   |      |  |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |     |     |      |     |     |      |     |         |      |      |          |
| May     | 2.00   | 1.98   |      |  |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |     |     |      |     |     |      |     |         |      |      |          |
| Jun     | 1.97   | 1.99   |      |  |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |     |     |      |     |     |      |     |         |      |      |          |
| Jul     | 1.95   | 1.99   |      |  |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |     |     |      |     |     |      |     |         |      |      |          |
| Aug     | 2.01   | 1.96   |      |  |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |     |     |      |     |     |      |     |         |      |      |          |
| Sep     | 1.99   | 1.98   |      |  |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |     |     |      |     |     |      |     |         |      |      |          |
| Oct     | 1.98   | N/A  |      |  |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |     |     |      |     |     |      |     |         |      |      |          |
| Nov     | 1.96   | N/A  |      |  |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |     |     |      |     |     |      |     |         |      |      |          |
| Dec     | 1.89   | N/A  |      |  |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |     |     |      |     |     |      |     |         |      |      |          |
| Average | 1.99   | 2.02   |      |  |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |      |     |      |     |     |      |     |     |      |     |         |      |      |          |

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|  |   | The water consumption for mill processing was acceptable as the target was at 1.20L/ton FFB processed.   |       |             |      |               |  |               |  |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |     |      |     |      |     |     |      |     |      |     |      |     |          |
|--|---|--|-------|-------------|------|---------------|--|---------------|--|------|------|------|------|------|------|-----|------|------|------|------|------|------|-----|------|------|------|------|------|------|-----|------|------|------|------|------|------|-----|------|------|------|------|------|------|-----|------|------|------|------|------|------|-----|------|------|------|------|------|------|-----|------|------|------|------|------|------|-----|------|------|------|------|------|------|-----|------|------|------|------|------|------|-----|------|-----|------|-----|------|-----|-----|------|-----|------|-----|------|-----|----------|
| <b>Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised</b> |   |  |       |             |      |               |  |               |  |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |     |      |     |      |     |     |      |     |      |     |      |     |          |
| 7.9.1  | A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.<br>- Minor compliance - | <p>The operating units has established management plan to optimise the usage of fossil fuel. Reviewed the implementation of the management plan as follows:</p> <p>The operating units monitored the diesel usage per FFB on monthly basis. reviewed the records FY 2021 and to date September 2022 as follows:</p> <table border="1"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="2">Kemaman POM</th> <th colspan="2">Gajah Mati</th> <th colspan="2">Jerneh Estate</th> </tr> <tr> <th>2021</th> <th>2022</th> <th>2021</th> <th>2022</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>1.65</td> <td>1.38</td> <td>3.22</td> <td>2.03</td> <td>4.05</td> <td>3.28</td> </tr> <tr> <td>Feb</td> <td>2.01</td> <td>1.40</td> <td>3.37</td> <td>2.79</td> <td>3.14</td> <td>3.27</td> </tr> <tr> <td>Mar</td> <td>1.95</td> <td>1.45</td> <td>3.17</td> <td>2.19</td> <td>3.35</td> <td>3.33</td> </tr> <tr> <td>Apr</td> <td>2.06</td> <td>1.31</td> <td>2.11</td> <td>2.15</td> <td>3.28</td> <td>3.73</td> </tr> <tr> <td>May</td> <td>1.69</td> <td>0.99</td> <td>1.90</td> <td>2,44</td> <td>3.53</td> <td>3.52</td> </tr> <tr> <td>Jun</td> <td>1.33</td> <td>1.52</td> <td>2.89</td> <td>2.33</td> <td>3.95</td> <td>3.51</td> </tr> <tr> <td>Jul</td> <td>2.21</td> <td>1.52</td> <td>2.57</td> <td>1.68</td> <td>3.98</td> <td>3.50</td> </tr> <tr> <td>Aug</td> <td>1.35</td> <td>1.06</td> <td>1.90</td> <td>1.87</td> <td>2.32</td> <td>3.01</td> </tr> <tr> <td>Sep</td> <td>0.95</td> <td>0.90</td> <td>2.25</td> <td>1.66</td> <td>2.71</td> <td>2.80</td> </tr> <tr> <td>Oct</td> <td>0.82</td> <td>N/A</td> <td>1.94</td> <td>N/A</td> <td>2.54</td> <td>N/A</td> </tr> <tr> <td>Nov</td> <td>0.95</td> <td>N/A</td> <td>2.08</td> <td>N/A</td> <td>2.68</td> <td>N/A</td> </tr> </tbody> </table> | Month | Kemaman POM |      | Gajah Mati    |  | Jerneh Estate |  | 2021 | 2022 | 2021 | 2022 | 2021 | 2022 | Jan | 1.65 | 1.38 | 3.22 | 2.03 | 4.05 | 3.28 | Feb | 2.01 | 1.40 | 3.37 | 2.79 | 3.14 | 3.27 | Mar | 1.95 | 1.45 | 3.17 | 2.19 | 3.35 | 3.33 | Apr | 2.06 | 1.31 | 2.11 | 2.15 | 3.28 | 3.73 | May | 1.69 | 0.99 | 1.90 | 2,44 | 3.53 | 3.52 | Jun | 1.33 | 1.52 | 2.89 | 2.33 | 3.95 | 3.51 | Jul | 2.21 | 1.52 | 2.57 | 1.68 | 3.98 | 3.50 | Aug | 1.35 | 1.06 | 1.90 | 1.87 | 2.32 | 3.01 | Sep | 0.95 | 0.90 | 2.25 | 1.66 | 2.71 | 2.80 | Oct | 0.82 | N/A | 1.94 | N/A | 2.54 | N/A | Nov | 0.95 | N/A | 2.08 | N/A | 2.68 | N/A | Complied |
| Month  | Kemaman POM   |  |       | Gajah Mati  |      | Jerneh Estate |  |               |  |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |     |      |     |      |     |     |      |     |      |     |      |     |          |
|  | 2021  | 2022   | 2021  | 2022        | 2021 | 2022          |  |               |  |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |     |      |     |      |     |     |      |     |      |     |      |     |          |
| Jan  | 1.65  | 1.38   | 3.22  | 2.03        | 4.05 | 3.28          |  |               |  |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |     |      |     |      |     |     |      |     |      |     |      |     |          |
| Feb  | 2.01  | 1.40   | 3.37  | 2.79        | 3.14 | 3.27          |  |               |  |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |     |      |     |      |     |     |      |     |      |     |      |     |          |
| Mar  | 1.95  | 1.45   | 3.17  | 2.19        | 3.35 | 3.33          |  |               |  |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |     |      |     |      |     |     |      |     |      |     |      |     |          |
| Apr  | 2.06  | 1.31   | 2.11  | 2.15        | 3.28 | 3.73          |  |               |  |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |     |      |     |      |     |     |      |     |      |     |      |     |          |
| May  | 1.69  | 0.99   | 1.90  | 2,44        | 3.53 | 3.52          |  |               |  |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |     |      |     |      |     |     |      |     |      |     |      |     |          |
| Jun  | 1.33  | 1.52   | 2.89  | 2.33        | 3.95 | 3.51          |  |               |  |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |     |      |     |      |     |     |      |     |      |     |      |     |          |
| Jul  | 2.21  | 1.52   | 2.57  | 1.68        | 3.98 | 3.50          |  |               |  |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |     |      |     |      |     |     |      |     |      |     |      |     |          |
| Aug  | 1.35  | 1.06   | 1.90  | 1.87        | 2.32 | 3.01          |  |               |  |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |     |      |     |      |     |     |      |     |      |     |      |     |          |
| Sep  | 0.95  | 0.90   | 2.25  | 1.66        | 2.71 | 2.80          |  |               |  |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |     |      |     |      |     |     |      |     |      |     |      |     |          |
| Oct  | 0.82  | N/A  | 1.94  | N/A         | 2.54 | N/A           |  |               |  |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |     |      |     |      |     |     |      |     |      |     |      |     |          |
| Nov  | 0.95  | N/A  | 2.08  | N/A         | 2.68 | N/A           |  |               |  |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |      |      |      |      |      |     |      |     |      |     |      |     |     |      |     |      |     |      |     |          |

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|---|--|---|------|-----|------|-----|------|-----|----------|
|   |  | Dec   | 1.08 | N/A | 2.65 | N/A | 2.76 | N/A |          |
|   |  | To reduce the consumption of diesel usage for power generation, the mill have budgeted for TNB Supply in 2023 CAPEX.  |      |     |      |     |      |     |          |
| <b>Criterion 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions. |  |   |      |     |      |     |      |     |          |
| 7.10.1  | <p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>   | <p>Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points.</p> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 4.0 which is submitted to the RSPO Secretariat. Based on verification of various record, the data in the RSPO PalmGHG Calculator was correct.</p> |      |     |      |     |      |     | Complied |
| 7.10.2  | <p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p> | No development within Kemaman POM and Supply Base since 2014.   |      |     |      |     |      |     | Complied |
| 7.10.3  | <p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>   | <p>Significant pollutants identification was conducted during environmental impact assessment and plans are documented under environmental management plan. Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.</p>   |      |     |      |     |      |     | Complied |

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|   |  |   |          |
|---|--|---|----------|
|   |  | <p>Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> <li>1. The mill conducted stack sampling twice a year. Reviewed the latest stack sampling conducted on 20/04/2022, refer report no. L-GB-TC2204CTP-0361 dated 10/05/2022 and 22/06/2022, refer report no. L-GB-TC2206CTP-0377 dated 12/07/2022.</li> <li>2. To prevent the leakage of kernel oil from bunker, the mill has placed oil tray under the bunker.</li> <li>3. The estate avoid any leachate come from EFB, the mill has in progress to build new EFB dumping site. The tender has been awarded as per Letter of Award no. TDMP 27/22 dated 14/09/2022.</li> <li>4. To the greenhouse gases release by the methane gas, the mill has completed the construction of Biogas Plant. The initial operation date test was held on 27/01/2022 and the agreement has been signed with TNB.</li> </ol> |          |
| <b>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</b> |  |   |          |
| 7.11.1  | <p><b>(C)</b> Land for new planting or replanting is not prepared by burning.<br/>- Critical (Major) compliance -</p>                          | <p>There was no land preparation for replanting by burning ever since TDM Plantation Sdn. Bhd. practiced zero burning as per the policy in:</p> <ol style="list-style-type: none"> <li>a) Under felling/clearing &amp; land preparation</li> <li>b) Carbon Policy</li> </ol> <p>TDM has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>   | Complied |
| 7.11.2  | <p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> | <p>TDM Plantation Sdn. Bhd. has established fire prevention and control measures documented in Standard Operating Procedure, Emergency</p>  | Complied |

|   |  |  |          |
|---|--|--|----------|
|   | - Minor compliance -   | Preparedness and Response, edition: TDM/01, revision: TDMP-01/2018 dated 01/01/2018.<br>Fire prevention plan was covers under flowchart as follows:<br>1. Fig. 4.4a – Emergency Response Plan in the Event of Fire<br>2. Fig. 4.4b – Emergency Response Plan in the Event of an Explosion<br>Emergency drill conducted on annually basis to prepare everyone of any case of emergency. |          |
| 7.11.3  | The unit of certification engages with adjacent stakeholders on fire prevention and control measures.<br>- Minor compliance -  | The certification units engages the fire prevention and control measures with the adjacent stakeholders during stakeholders meeting. Reviewed the stakeholders minutes meeting as follows:<br>Kemaman POM: 27/07/2022<br>Gajah Mati Estate: 14/09/2022<br>Jerneh Estate: 27/07/2022  | Complied |
| <b>Criterion 7.12:</b> Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced. |  |  |          |
| 7.12.1  | <b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.<br>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.<br>- Critical (Major) compliance - | No new planting or land clearing conducted in the certification units since 15/11/2018.<br>TDM Plantation Sdn. Bhd. has conducted HCV assessment on 23/10/2011 till 01/11/2011. The assessment was documented in TDM Plantation Sdn. Bhd. Bio Diversity Assessment (Bio D), Kemaman Complex dated November 2011.   | Complied |
| 7.12.2  | <b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:<br>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.  | TDM Plantation Sdn. Bhd. has conducted HCV assessment on 23/10/2011 till 01/11/2011. The assessment was documented in TDM Plantation Sdn. Bhd. Bio Diversity Assessment (Bio D), Kemaman Complex dated November 2011. The HCV identified were  | Complied |

|                   | <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b><br/>         Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).<br/>         - Critical (Major) compliance -</p>   | <p>listed in section 8.3 Decision on HCV Status. Among the HCV and conservation area identified in the sampled estates as follows:</p> <table border="1" data-bbox="1137 432 1928 847"> <thead> <tr> <th>Estate</th> <th>Area</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Gajah Mati Estate</td> <td>Abandon field/unplantable area</td> <td>Conservation Area</td> </tr> <tr> <td>Wildlife sanctuary</td> <td>Conservation Area</td> </tr> <tr> <td>River buffer zone</td> <td>HCV 4</td> </tr> <tr> <td rowspan="3">Jerneh Estate</td> <td>Abandon field/unplantable area</td> <td>Conservation Area</td> </tr> <tr> <td>River buffer zone</td> <td>HCV 4</td> </tr> <tr> <td>Masjid</td> <td>HCV 6</td> </tr> </tbody> </table> | Estate         | Area | Status | Gajah Mati Estate | Abandon field/unplantable area | Conservation Area | Wildlife sanctuary | Conservation Area | River buffer zone | HCV 4 | Jerneh Estate | Abandon field/unplantable area | Conservation Area | River buffer zone | HCV 4 | Masjid | HCV 6 |  |
|-------------------|---|---|----------------|------|--------|-------------------|--------------------------------|-------------------|--------------------|-------------------|-------------------|-------|---------------|--------------------------------|-------------------|-------------------|-------|--------|-------|--|
| Estate            | Area  | Status  |                |      |        |                   |                                |                   |                    |                   |                   |       |               |                                |                   |                   |       |        |       |  |
| Gajah Mati Estate | Abandon field/unplantable area  | Conservation Area   |                |      |        |                   |                                |                   |                    |                   |                   |       |               |                                |                   |                   |       |        |       |  |
|                   | Wildlife sanctuary  | Conservation Area   |                |      |        |                   |                                |                   |                    |                   |                   |       |               |                                |                   |                   |       |        |       |  |
|                   | River buffer zone   | HCV 4   |                |      |        |                   |                                |                   |                    |                   |                   |       |               |                                |                   |                   |       |        |       |  |
| Jerneh Estate     | Abandon field/unplantable area  | Conservation Area   |                |      |        |                   |                                |                   |                    |                   |                   |       |               |                                |                   |                   |       |        |       |  |
|                   | River buffer zone   | HCV 4   |                |      |        |                   |                                |                   |                    |                   |                   |       |               |                                |                   |                   |       |        |       |  |
|                   | Masjid  | HCV 6   |                |      |        |                   |                                |                   |                    |                   |                   |       |               |                                |                   |                   |       |        |       |  |
| 7.12.3            | <i>Indicator is not applicable in Malaysia context</i>  | <b>NA</b>   | Not Applicable |      |        |                   |                                |                   |                    |                   |                   |       |               |                                |                   |                   |       |        |       |  |
| 7.12.4            | <p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).<br/>         - Critical (Major) compliance -</p> | <p>TDM Plantation Sdn. Bhd. has conducted HCV assessment on 23/10/2011 till 01/11/2011. The assessment was documented in TDM Plantation Sdn. Bhd. Bio Diversity Assessment (Bio D), Kemaman Complex dated November 2011.</p> <p>Base on the HCV identified in the report, the estate has established management plan. Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> <li>1. The estates conducted HCV/conservation area monitoring once every 2 months. The monitoring covers on animal sighting, trace of hunting, trace of animal shelter, HCV disturbance, erosion and chemical application in the area. Reviewed the</li> </ol>  | Complied       |      |        |                   |                                |                   |                    |                   |                   |       |               |                                |                   |                   |       |        |       |  |

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|        |  |  |          |
|--------|--|--|----------|
|        |  | <p>monitoring records for the month of January, March, May, July and September 2022.</p> <p>2. The estate has erected signboard on the HCV area. During site visit, signboard on prohibition of activities and hunting of RTE in the HCV area as sighted at Animal Sanctuary area in field PM 17A/1 and Swampy area of PM 17A/2 of Gajah Mati estate and Abandon field/ unplantable area at field PM 16B/1.</p> <p>The estates conducted water sampling for river flow through the estate on annually basis. Latest water sampling for Gajah Mati Estate was conducted on 19/09/2022. The report has yet to be received by the estate. Latest water sampling for Jernih Estate was conducted on 23/08/2022. The results was in compliance to Class IIA/IIB of National Water Quality Standards for Malaysia.</p> |          |
| 7.12.5 | <p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>   | <p>There was no rights of local communities been identified in HCV areas, HCS forest after 15/11/2018, peat land and other conservation areas.</p>   | Complied |
| 7.12.6 | <p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p> | <p>The estates management continue to promote awareness on HCV/RTE to the workers during morning briefing and training. Reviewed training records as per criteria 3.7.2.</p> <p>The estates has also erected signage at strategic designated places in the estates such as at the estates entrance, office, housing area and notice board to ensure the awareness on the HCV and RTE.</p> <p>The estate has also communicate the information on HCV and RTE to all stakeholders during stakeholders meeting.</p>   | Complied |

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|        |   |   |          |
|--------|---|---|----------|
| 7.12.7 | <p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>                     | <p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15/11/2018 in the all estates sampled.</p> <p>Monitoring of these areas are made through the daily field supervision by the field staff and executives.</p> <p>The estates sampled conducted HCV/conservation area monitoring once every 2 months. The monitoring covers on animal sighting, trace of hunting, trace of animal shelter, HCV disturbance, erosion and chemical application in the area. Reviewed the monitoring records for the month of January, March, May, July and September 2022.</p> | Complied |
| 7.12.8 | <p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p> | <p>No land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15/11/2008 2018 within certification unit.</p>   | Complied |

**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2021** for **Kemaman Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

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

| Emission per product | tCO <sub>2</sub> e/tProduct |
|----------------------|-----------------------------|
| CPO                  | 1.35                        |
| PKO                  | 1.35                        |

| Extraction | %     |
|------------|-------|
| OER        | 19.40 |
| KER        | 4.63  |

| Production   | t/yr       |
|--------------|------------|
| FFB Process  | 159,347.79 |
| CPO Produced | 30918.50   |
| PKO Produced | 7382.68    |

| Land Use                    | Ha               |
|-----------------------------|------------------|
| OP Planted Area             | 29,069.88        |
| OP Planted on peat          | 0.00             |
| Conservation (forested)     | 0.00             |
| Conservation (non-forested) | 469.77           |
| <b>Total</b>                | <b>29,539.65</b> |

**Summary of Field Emission and Sink**

|  | Own Crop*          |                          | Group              |                          | 3 <sup>rd</sup> Party |                          | Total              |                          |
|--|--------------------|--------------------------|--------------------|--------------------------|-----------------------|--------------------------|--------------------|--------------------------|
|  | tCO <sub>2</sub> e | tCO <sub>2</sub> e / FFB | tCO <sub>2</sub> e | tCO <sub>2</sub> e / FFB | tCO <sub>2</sub> e    | tCO <sub>2</sub> e / FFB | tCO <sub>2</sub> e | tCO <sub>2</sub> e / FFB |
| <b>Emission</b>                          |                    |                          |                    |                          |                       |                          |                    |                          |
| Land Conversion                          | 202,782.59         | 1.28                     | 0.00               | 0.00                     | 17,883.61             | 0.00                     | 220,666.21         | 1.28                     |
| CO <sub>2</sub> Emission from fertilizer | 14,971.03          | 0.09                     | 0.00               | 0.00                     | 65.66                 | 0.00                     | 15,036.69          | 0.09                     |
| NO <sub>2</sub> Emission                 | 0.00               | 0.00                     | 0.00               | 0.00                     | 0.00                  | 0.00                     | 0.00               | 0.00                     |
| Fuel Consumption                         | 2,431.40           | 0.02                     | 0.00               | 0.00                     | 111.90                | 0.00                     | 2,543.29           | 0.02                     |
| Peat Oxidation                           | 0.00               | 0.00                     | 0.00               | 0.00                     | 0.00                  | 0.00                     | 0.00               | 0.00                     |
| <b>Sink</b>                              |                    |                          |                    |                          |                       |                          |                    |                          |
| Crop Sequestration                       | -171,525.27        | -1.08                    | 0.00               | 0.00                     | -15,744.27            | 0.00                     | -187,269.54        | -1.08                    |
| Conservation Sequestration               | 0.00               | 0.00                     | 0.00               | 0.00                     | 0.00                  | 0.00                     | 0.00               | 0.00                     |
| <b>Total</b>                             | <b>48,659.75</b>   | <b>0.31</b>              | 0.00               | 0.00                     | <b>2,316.90</b>       | 0.00                     | <b>50,976.64</b>   | <b>0.31</b>              |

*\*Note: Includes both estates and smallholders*

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**Summary of Mill Emission and Credit**

|                              | tCO <sub>2</sub> e | tCO <sub>2</sub> e/tFFB |
|------------------------------|--------------------|-------------------------|
| <b>Emission</b>              |                    |                         |
| POME                         | 0.00               | 0.00                    |
| Fuel Consumption             | 674.33             | 0.00                    |
| Grid Electricity Utilization | 0.00               | 0.00                    |
| <b>Credit</b>                |                    |                         |
| Export of Grid Electricity   | 0.00               | 0.00                    |
| Sales of PKS                 | 0.00               | 0.00                    |
| Sales of EFB                 | 0.00               | 0.00                    |
| <b>Total</b>                 | 674.33             | 0.00                    |

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

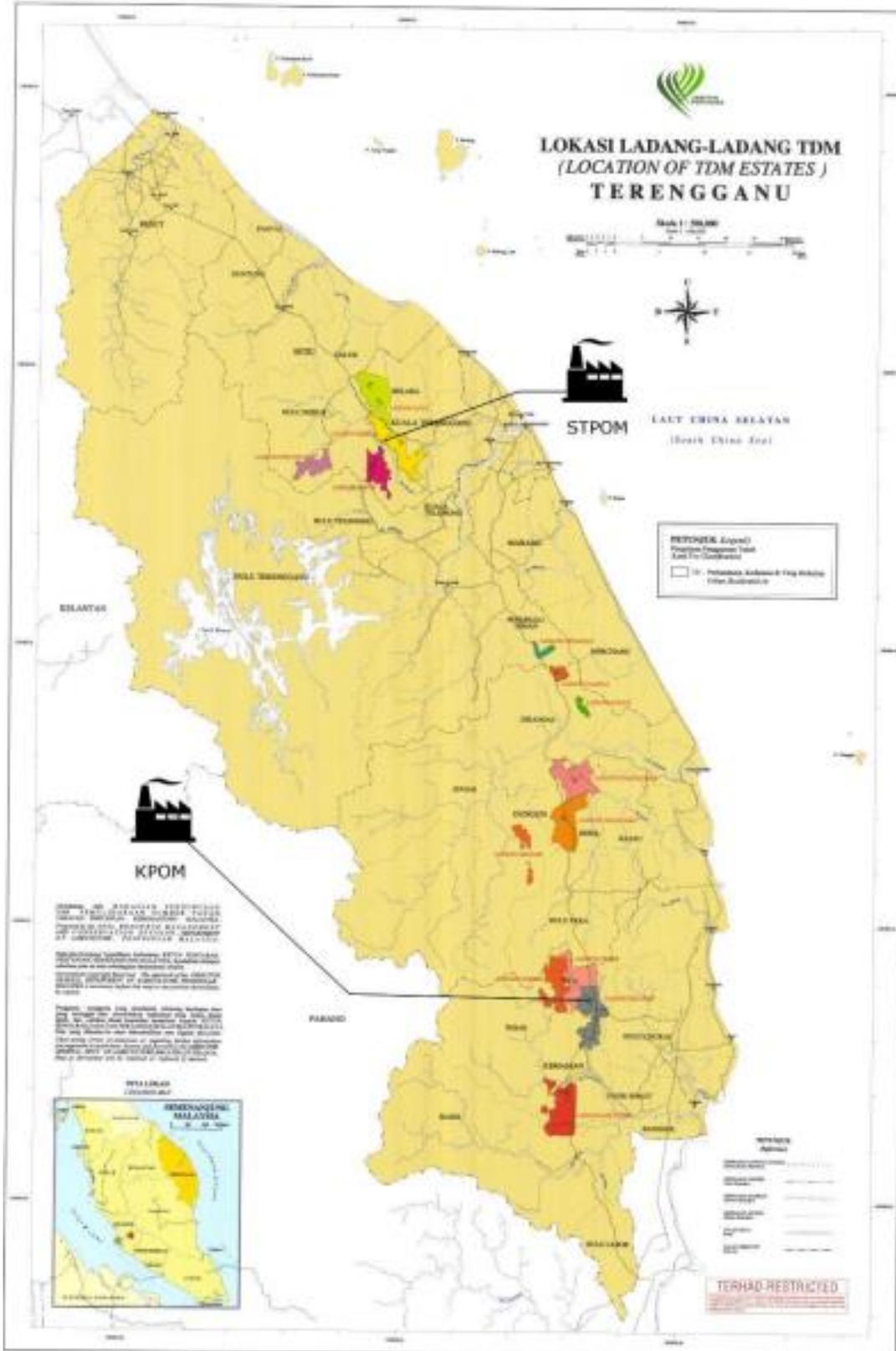
| Emissions                      | tCO <sub>2</sub> e |
|--------------------------------|--------------------|
| PK from own mill               | 0.00               |
| PK from other source           | 0.00               |
| Fuel Consumptions              | 0.00               |
| <b>Total Crusher emissions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

\*This mill has no kernel crusher operation.

| <b>Palm Oil Mill Effluent (POME) Treatment:</b> |       |
|---|-------|
| Divert to Compost (%)                           | 10.00 |
| Divert to anaerobic diversion (%)               | 90.00 |

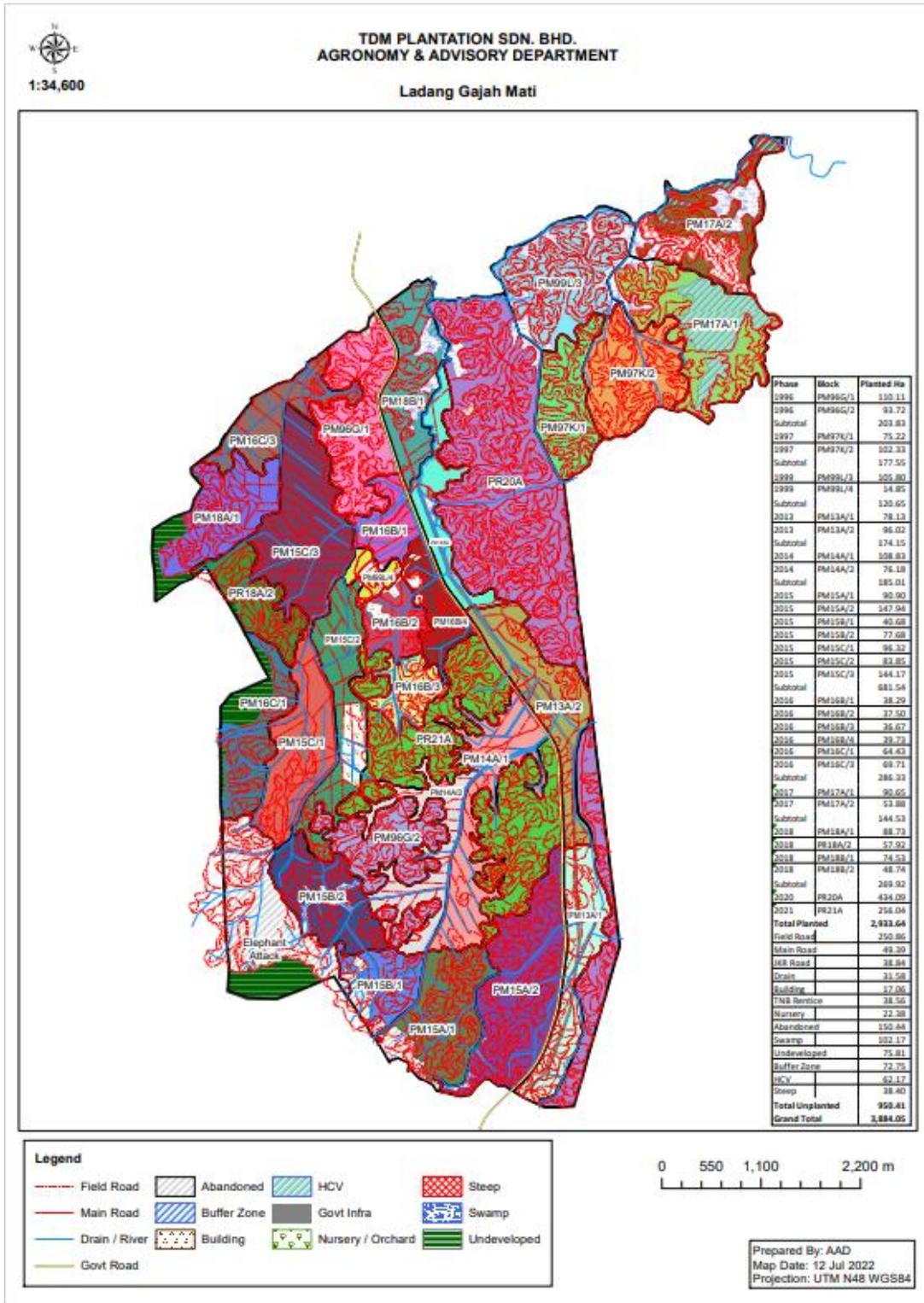
| <b>POME Diverted to Anaerobic Digestion:</b>       |        |
|--|--------|
| Divert to anaerobic pond (%)                       | 100.00 |
| Divert to methane captured (flaring) (%)           | 0.00   |
| Divert to methane captured (energy generation) (%) | 0.00   |

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



**Appendix D: Estate Field Map**

**Gajah Mati Estate**



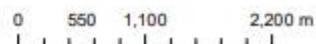
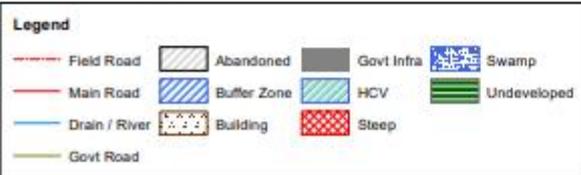
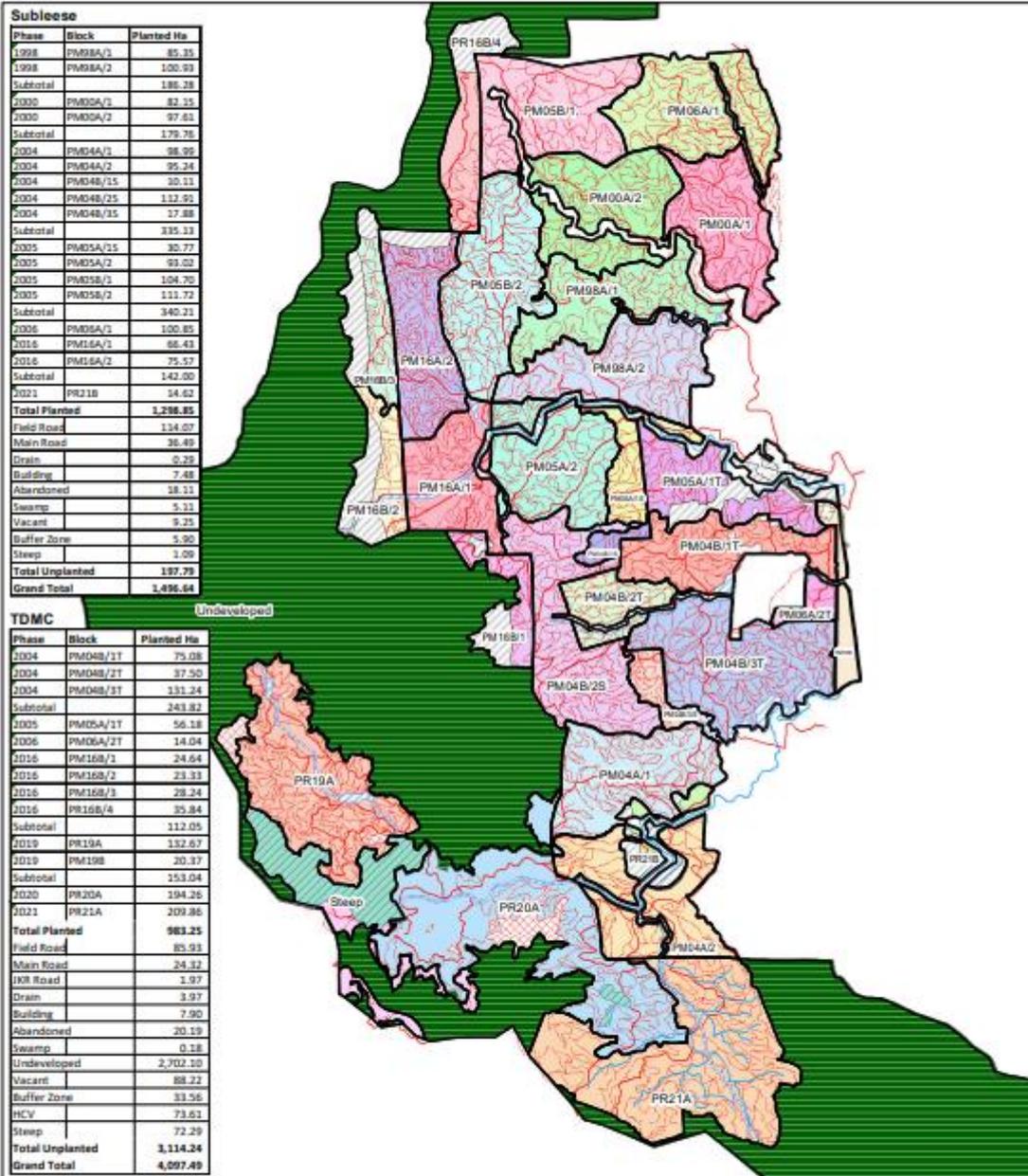
**Jernih Estate**



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TDM PLANTATION SDN. BHD.  
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Ladang Jernih



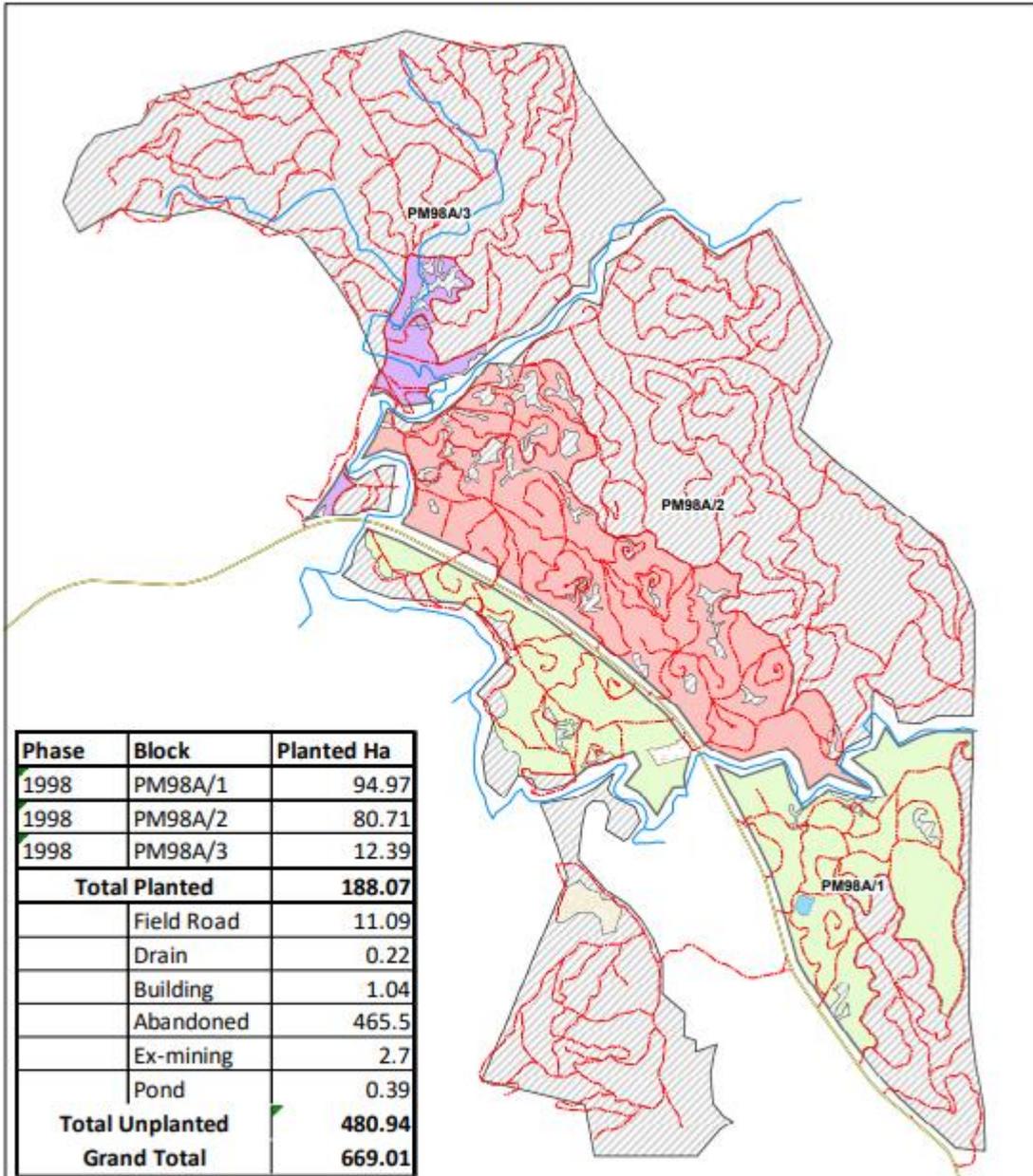
Prepared By: AAD  
 Map Date: 6 Oct 2022  
 Projection: UTM N48 WGS84

**MAIDAM Estate**



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Ladang MAI 1



| Legend |               |
|--------|---------------|
|        | Field Road    |
|        | PM98A/1       |
|        | Abandoned     |
|        | Building      |
|        | Ex-mining     |
|        | Main Road     |
|        | PM98A/2       |
|        | Drain / River |
|        | PM98A/3       |
|        | Govt Road     |
|        | Pond          |



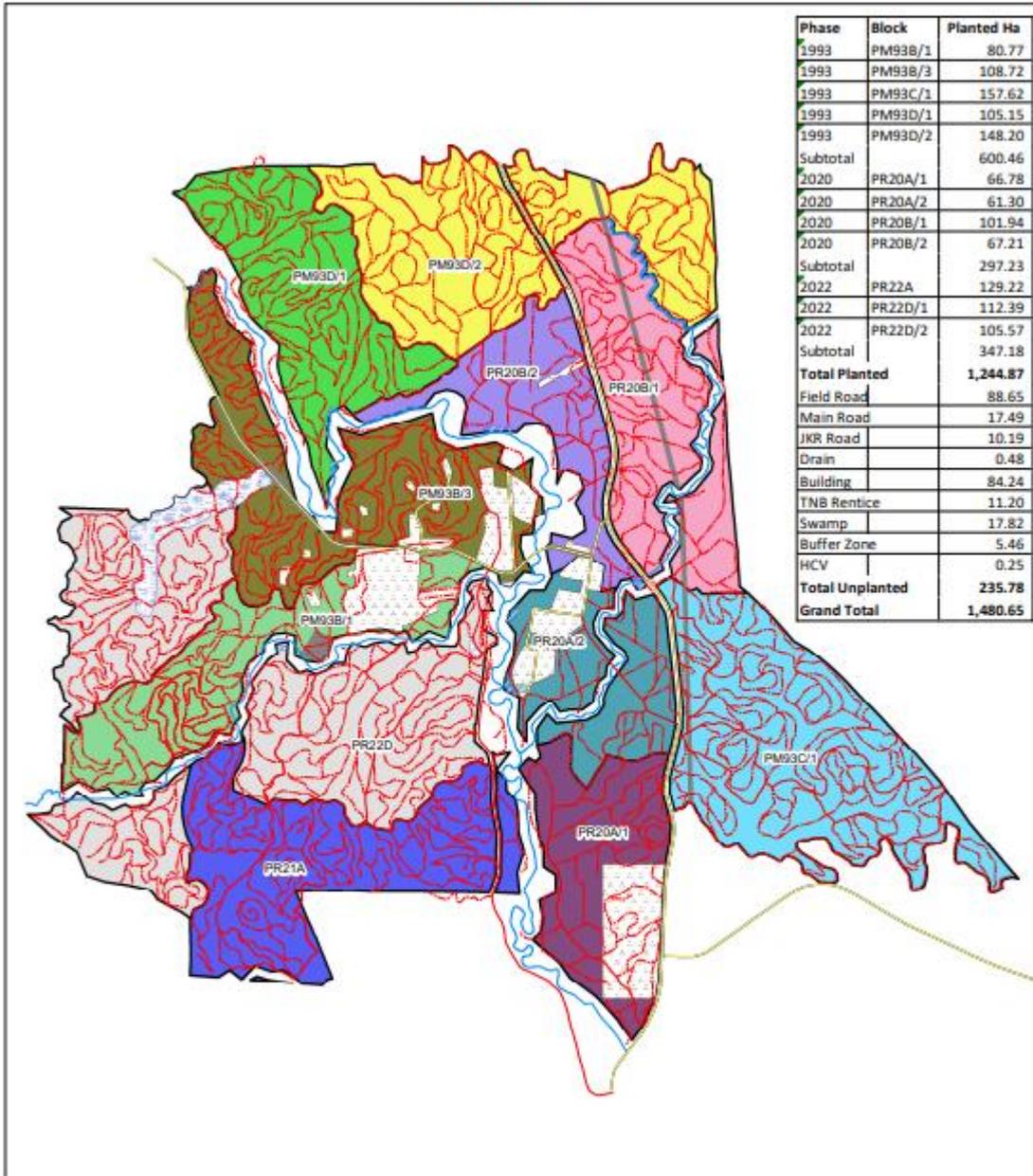
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 Projection: UTM N48 WGS84

**Pelantoh Estate**



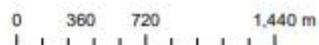
TDM PLANTATION SDN. BHD.  
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Ladang Pelantoh North



| Phase                  | Block   | Planted Ha      |
|------------------------|---------|-----------------|
| 1993                   | PM93B/1 | 80.77           |
| 1993                   | PM93B/3 | 108.72          |
| 1993                   | PM93C/1 | 157.62          |
| 1993                   | PM93D/1 | 105.15          |
| 1993                   | PM93D/2 | 148.20          |
| Subtotal               |         | 600.46          |
| 2020                   | PR20A/1 | 66.78           |
| 2020                   | PR20A/2 | 61.30           |
| 2020                   | PR20B/1 | 101.94          |
| 2020                   | PR20B/2 | 67.21           |
| Subtotal               |         | 297.23          |
| 2022                   | PR22A   | 129.22          |
| 2022                   | PR22D/1 | 112.39          |
| 2022                   | PR22D/2 | 105.57          |
| Subtotal               |         | 347.18          |
| <b>Total Planted</b>   |         | <b>1,244.87</b> |
| Field Road             |         | 88.65           |
| Main Road              |         | 17.49           |
| JKR Road               |         | 10.19           |
| Drain                  |         | 0.48            |
| Building               |         | 84.24           |
| TNB Rentice            |         | 11.20           |
| Swamp                  |         | 17.82           |
| Buffer Zone            |         | 5.46            |
| HCV                    |         | 0.25            |
| <b>Total Unplanted</b> |         | <b>235.78</b>   |
| <b>Grand Total</b>     |         | <b>1,480.65</b> |

| Legend        |             |            |
|---------------|-------------|------------|
| Field Road    | Buffer Zone | Govt Infra |
| Main Road     | Building    | Swamp      |
| Drain / River | HCV         |            |
| Govt Road     |             |            |



Prepared By: AAD  
 Map Date: 12 Jul 2022  
 Projection: UTM N48 WGS84

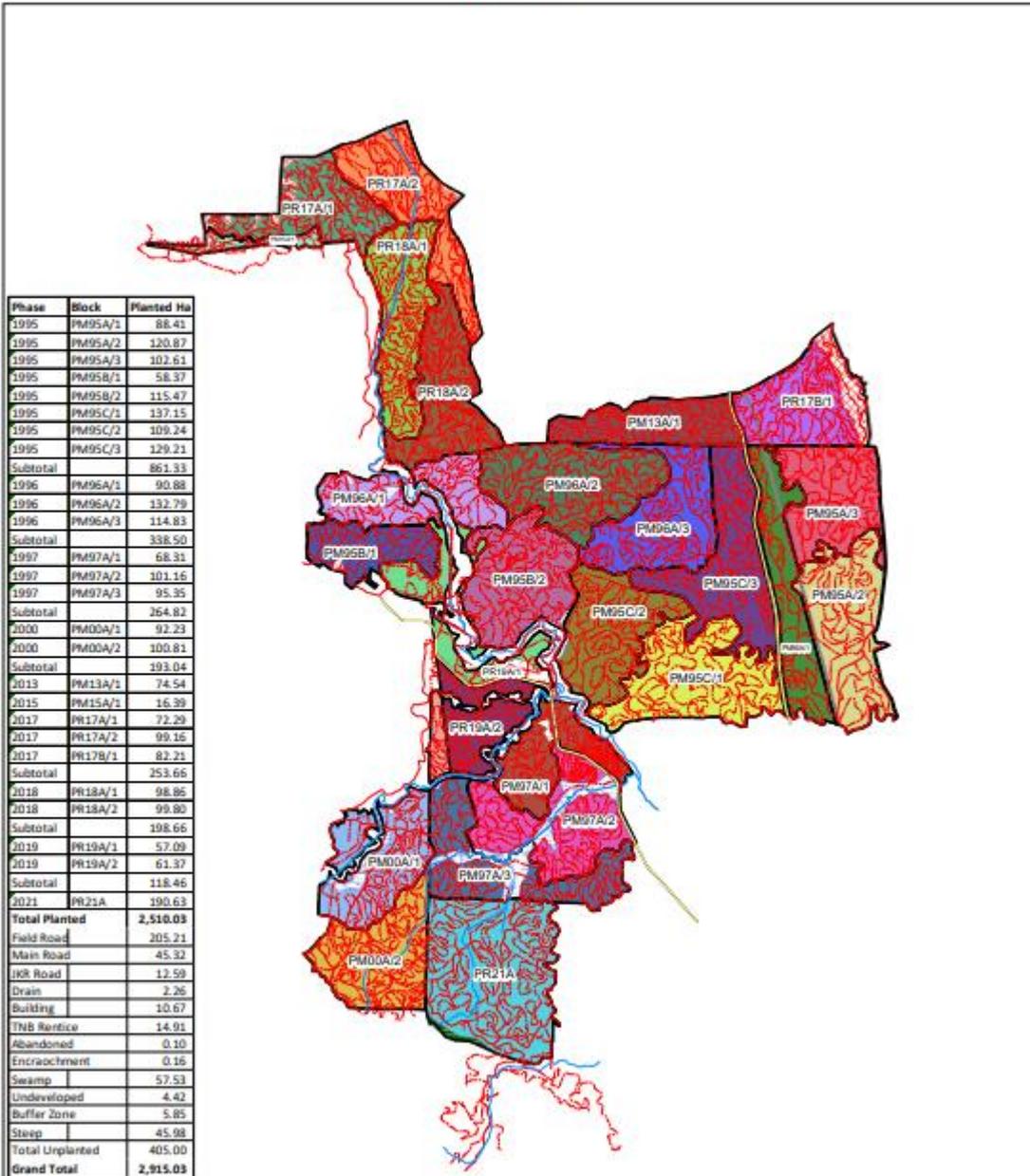
**Tebak Estate**



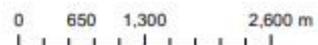
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Ladang Tebak



| Legend        |              |             |
|---------------|--------------|-------------|
| Field Road    | Abandoned    | Govt Infra  |
| Main Road     | Buffer Zone  | Steep       |
| Drain / River | Building     | Swamp       |
| Govt Road     | Encroachment | Undeveloped |



Prepared By: AAD  
 Map Date: 12 Jul 2022  
 Projection: UTM N48 WGS84

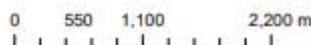
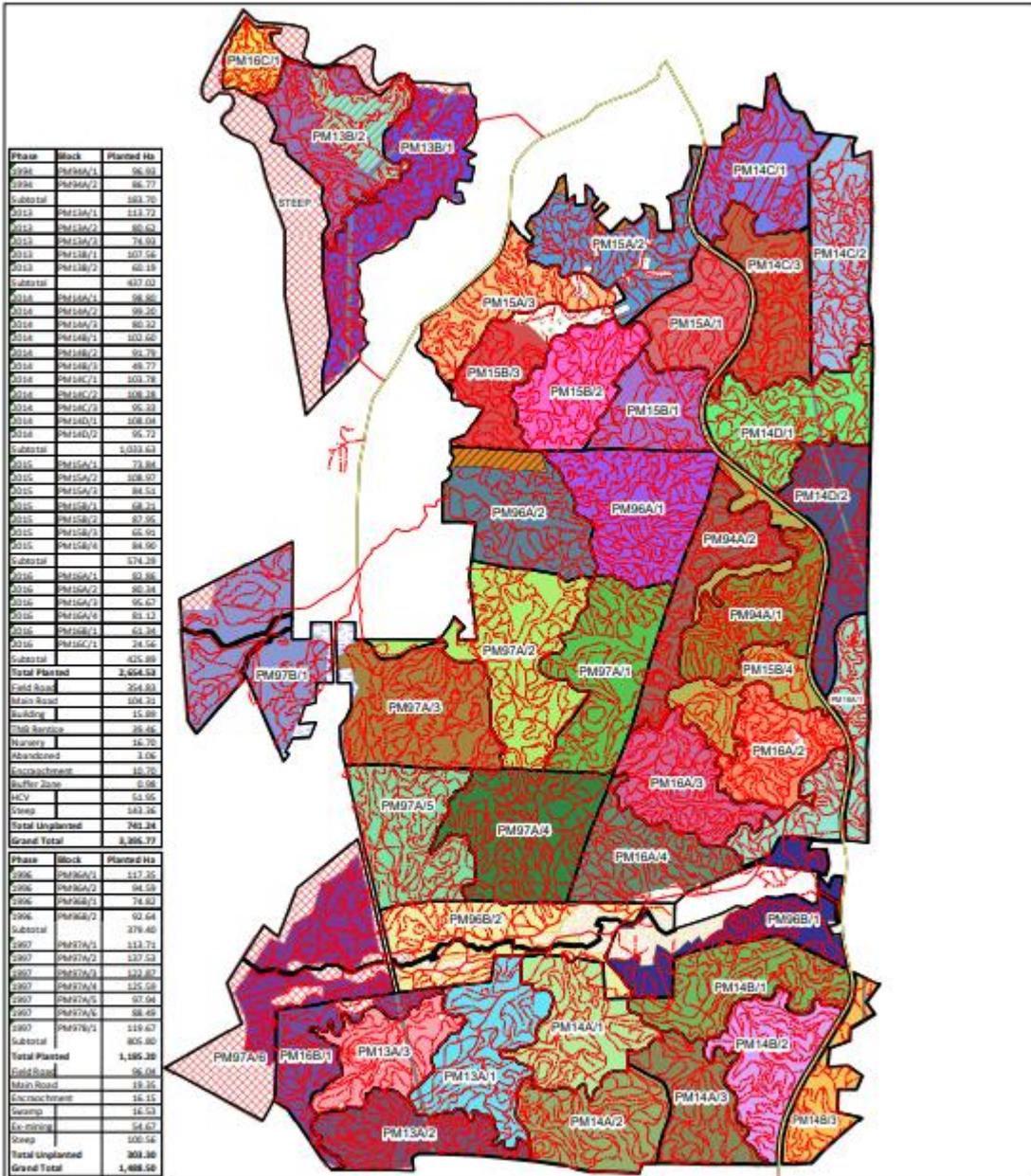
**Air Putih Estate**



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Ladang Air Putih



Prepared By: AAD  
 Map Date: 13 Jul 2022  
 Projection: UTM N48 WGS84



## **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                                       |