

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (2_2)**
- Recertification Assessment (Choose an item.)
- Extension of Scope

| |
|---|
| Client Company Name / Parent Company: Sime Darby Plantation Berhad |
| Client Company / Parent Company Address: Level 5, Main Block, Plantation Tower No, 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia |
| Certification Unit: Strategic Operating Unit (SOU 24) - Hadapan Palm Oil Mill |
| Location of Certification Unit: Batu 6, Jalan Bukit Permai, Bukit Permai, 81850 Layang-Layang, Johor, Malaysia |
| Date of Final Report: 10/03/2023 |

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Section 1: Scope of the Assessment

| 1. Company Details | | | |
|--|---|---------------------------------|---|
| Parent Company | Sime Darby Plantation Berhad | | |
| RSPO Membership Number | 1-0008-04-000-00 | Membership Approval Date | 07/09/2004 |
| Address | Level 5, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia | | |
| Palm Oil Mill / Group Manager / Estate (Certification Unit) | Strategic Operating Unit (SOU 24) - Hadapan Palm Oil Mill | | |
| Location / Address | Batu 6, Jalan Bukit Permai, Bukit Permai, 81850 Layang-Layang, Johor, Malaysia. | | |
| Website | http://www.simedarbyplantation.com/ | | |
| Management Representative | Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, GSD) | E-mail | shylaja.vasudevan@simedarbyplantation.com |
| Telephone | +(603) 78484000 | Facsimile | +603 7848 4363 |

| 2. Certification Information | | | |
|---|---|---|--|
| Certificate Number | RSPO 739013 | Certificate Start Date | 29/03/2021 |
| Date of First Certification | 29/03/2011 | Certificate Expiry Date | 28/03/2026 |
| Scope of Certification | Production of Palm Oil and Palm Kernel | | |
| Visit Objectives | The objective of the assessment was to conduct a surveillance assessment of the existing certification to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by the organisation's management system. | | |
| Assessment Cycle | <input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_2) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension | | |
| Applicable Standards / Normative Reference | RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil | | |
| Supply Chain Module | <input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance | Mill Capacity | 60 mt/hr |
| ISH certification Phase | <input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable | | |
| Is this a remote audit or on-site audit | <input checked="" type="checkbox"/> On-site audit (Option AI) | <input type="checkbox"/> On-site audit (Option AII) | <input type="checkbox"/> Remote audit (Option B) |

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| 3. Other Certifications | | | |
|-------------------------|---|---------------------------------|-------------|
| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date |
| MSPO 739513 | MS 2530-4:2013 Malaysia Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills | BSI Services Malaysia Sdn. Bhd. | 14/02/2023 |
| MSPO 739514 | MS 2530-3:2013 Malaysia Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholder | | 14/02/2023 |
| MSPO 739515 | MSPO Supply Chain Certification Standard: 2018 | | 23/03/2025 |

| 4. Location(s) of Mill & Supply Bases | | | |
|---|--|-----------------|-------------------|
| Name (Mill / Supply Base / Group Manager / Smallholders) | Location | GPS Coordinates | |
| | | Latitude | Longitude |
| Hadapan Palm Oil Mill | Batu 6, Jalan Bukit Permai, Bukit Permai, 81850 Layang-Layang, Johor | 1° 45' 44.00" N | 103° 26' 51.00" E |
| Kulai Estate | Batu 25, Jalan JB Air Hitam, 81000, Kulai, Johor | 1° 40' 05.14" N | 103° 32' 28.21" E |
| Layang Estate | Jalan Ladang Layang, 81850 Layang-Layang, Johor | 1° 46' 00.27" N | 103° 27' 14.07" E |
| Seri Pulai Estate | Ladang Seri Pulai, 81000 Kulai, Johor | 1° 35' 36.10" N | 103° 30' 34.30" E |
| CEP Rengam Estate | Ladang CEP Rengam, 86300 Rengam, Johor | 1° 52' 23.01" N | 103° 22' 45.73" 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 |
| Kulai Estate | 2,652.37 | 0.77 | 520.52 | 3,173.66 | 83.57 |
| Layang Estate | 2,819.72 | 6.02 | 282.37 | 3,108.11 | 90.72 |
| Seri Pulai Estate | 1,980.76 | 27.61 | 91.46 | 2,099.83 | 94.33 |
| CEP Rengam Estate | 2,869.32 | 7.19 | 217.48 | 3,093.99 | 92.74 |

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| | | | | | |
|--------------|-----------|-------|----------|-----------|-------|
| Total | 10,322.17 | 41.59 | 1,111.83 | 11,421.59 | 90.37 |
|--------------|-----------|-------|----------|-----------|-------|

| 6. Plantings & Cycle | | | | | | |
|---------------------------------|-------------------------|---------------|----------------|---------------|---------------|-----------------|
| Estate / Smallholders | Age (Years) - ha | | | | Mature | Immature |
| | 0 - 3 | 4 - 14 | 15 - 25 | >25 | | |
| Kulai Estate | 126.1 | 1,542.64 | 700.74 | 282.79 | 2,526.17 | 126.1 |
| Layang Estate | 67.03 | 393.19 | 2,305.71 | 53.79 | 2,752.69 | 67.03 |
| Seri Pulai Estate | 255.47 | 725.1 | 930.54 | 69.65 | 1,725.29 | 255.47 |
| CEP Rengam Estate | 418.45 | 538.64 | 1,487.22 | 425.01 | 2,450.87 | 418.45 |
| Total (ha) | 867.05 | 3,199.57 | 5,424.21 | 831.24 | 9,455.02 | 867.05 |

| 7. Summary of Certified Tonnage of FFB (Own Certified Scope) | | | | |
|---|--|--|---|---|
| Estate / Smallholders | Tonnage (MT) / year | | | |
| | Estimated last year (Mar 2022 – Feb 2023) | Actual (Dec 2021 – Nov 2022) | | Forecast (Mar 2023 – Feb 2024) |
| | | Previous license period (Dec 2021 – April 2022) | Current license period (May 2022 – Nov 2022) | |
| Kulai Estate | 48,927.30 | 11,129.97 | 13,729.23 | 25,744.55 |
| Layang Estate | 61,344.35 | 13,682.38 | 18,468.38 | 53,112.87 |
| Seri Pulai Estate | 35,169.04 | 9,384.09 | 14,162.15 | 31,672.17 |
| CEP Rengam Estate | 49,382.88 | 13,943.84 | 16,799.54 | 35,000.00 |
| Total | 194,823.57 | 111,299.58 | | 145,529.59 |

Note: As there will be 579.39 ha replanting on the year 2023-2024. So, the forecast volume of FFB production in the next license will be slightly reduced when comparing to the actual FFB production data

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| 8. Summary of Certified Tonnage of FFB (from other certified unit(s)) | | | | |
|--|--|--|---|---------------------------------------|
| Estate / Smallholders | Tonnage (MT) / year | | | |
| | Estimated last year (Mar 2022 – Feb 2023) | Actual (Dec 2021 – Nov 2022) | | Forecast (Mar 2023 – Feb 2024) |
| | | Previous license period (Dec 2021 – April 2022) | Current license period (May 2022 – Nov 2022) | |
| Sembrong Estate | | 269.75 | 362.33 | |
| Tun Dr. Ismail Estate | | 2,027.46 | 893.39 | |
| Bukit Badak Estate | | 716.74 | 464.81 | |
| Pekan Estate | | 1,324.96 | 1,020.32 | |
| Lambak Estate | | 1,158.99 | 135.07 | |
| Ulu Remis Estate | | 230.13 | 333.12 | |
| Tradewinds Plantation Berhad | | 4.75 | 145.06 | |
| Total | | | 9,086.88 | |

Note: The name of the UoC or POM for those supply bases who shared certified FFB to Hadapan POM is Ulu Remis POM

| 9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) | | | | |
|--|--|--|---|---------------------------------------|
| Out growers / smallholders | Tonnage (MT) / year | | | |
| | Estimated last year (Mar 2022 – Feb 2023) | Actual (Dec 2021 – Nov 2022) | | Forecast (Mar 2023 – Feb 2024) |
| | | Previous license period (Dec 2021 – April 2022) | Current license period (May 2022 – Nov 2022) | |
| OCP Supplier | | 21,735.94 | 16,922.47 | |
| Total | | | 38,658.41 | |

| 9A. Monthly Records of Certified and Uncertified FFB Received since the last audit | | | | |
|---|---------------------|--|--|-----------------------------|
| No. | Month - Year | Volume of FFB from certified supply base (mt) | Volume of FFB from uncertified supply base (mt) | Total FFB/Month (mt) |
| 1 | Dec 2021 | 12,667.49 | 4,143.37 | 16,810.86 |
| 2 | January 2022 | 11,606.95 | 3,700.20 | 15,307.15 |

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|--------------|----------------|-------------------|------------------|--------------------|
| 3 | February 2022 | 8,067.92 | 4,127.78 | 12,195.70 |
| 4 | March 2022 | 11,744.44 | 6,093.35 | 17,837.79 |
| 5 | April 2022 | 9,717.48 | 3,671.96 | 13,389.44 |
| 6 | May 2022 | 7,878.46 | 3,537.38 | 11,415.54 |
| 7 | June 2022 | 7,536.65 | 4,201.22 | 11,737.87 |
| 8 | July 2022 | 11,308.82 | 4,664.16 | 15,972.98 |
| 9 | August 2022 | 10,749.89 | 1,740.57 | 12,490.46 |
| 10 | September 2022 | 9,769.53 | 863.61 | 10,633.14 |
| 11 | October 2022 | 7,792.94 | 759.59 | 8,552.527 |
| 12 | November 2022 | 11,545.89 | 1,155.94 | 12,701.83 |
| TOTAL | | 120,386.46 | 38,659.13 | 159,045.287 |

| 10. Summary of Certified Tonnage (MT) (not applicable for ISS) | | | |
|---|--|---|---|
| Estimated last year (Mar 2022 – Feb 2023) | Actual (Dec 2021 – Nov 2022) | | Forecast (Mar 2023 – Feb 2024) |
| | Previous license period (Dec 2021 – April 2022) | Current license period (May 2022 – Nov 2022) | |
| FFB | FFB | | FFB |
| 194,823.57 mt | 53,804.28 mt | 66,582.18 mt | 145,529.59 mt |
| | TOTAL | 120,386.46 mt | |
| CPO (OER: 21.15%) | CPO (OER: 19.17 %) | | CPO (OER:19.70 %) |
| 41,205.19 mt | 10,314.28 mt | 12,744.63 mt | 28,669.32 mt |
| | TOTAL | 23,078.08 mt | |
| PK (KER: 4.75%) | PK (KER: 4.82 %) | | PK (KER:5.02 %) |
| 9,254.12 mt | 2,593.36 mt | 3,209.26 | 7,305.58 mt |
| | TOTAL | 5,802.63 mt | |

| 10A. Monthly Records of Certified CPO & PK since the last audit | | | |
|--|---------------------|---------------------------|--------------------------|
| No. | Month - Year | Certified CPO (MT) | Certified PK (MT) |
| 1 | Dec 2021 | 2,428.36 | 610.57 |
| 2 | January 2022 | 2,225.05 | 559.45 |
| 3 | February 2022 | 1,546.62 | 388.87 |
| 4 | March 2022 | 2,251.41 | 566.08 |
| 5 | April 2022 | 1,862.84 | 468.38 |

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|--------------|----------------|------------------|-----------------|
| 6 | May 2022 | 1,510.30 | 379.74 |
| 7 | June 2022 | 1,444.78 | 363.27 |
| 8 | July 2022 | 2,167.90 | 545.09 |
| 9 | August 2022 | 2,060.75 | 518.14 |
| 10 | September 2022 | 1,872.82 | 470.89 |
| 11 | October 2022 | 1,493.91 | 375.62 |
| 12 | November 2022 | 2,213.35 | 556.51 |
| TOTAL | | 23,078.08 | 5,802.63 |

| 11. Summary of Actual Volume sold | | | | | |
|---|----------------|-------------------------|--------|--------------|-----------|
| Current License period (May 2022 – Nov 2022) | | | | | |
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | Others | | |
| CPO (MT) | 1,448.06 | - | - | 12,660.75 | 14,108.81 |
| PK (MT) | 3,525.96 | - | - | 0 | 3,525.96 |
| Credits | - | - | - | - | - |
| Previous License period (Dec 2021 – April 2022) | | | | | |
| CPO (MT) | 106.36 | - | - | 1,852.91 | 1,959.27 |
| PK (MT) | 4,039.74 | - | - | 0 | 4,039.74 |
| Credits | 7,000 | - | - | - | 7,000 |
| Notes: There was oversold of CSPK and Major Nonconformity has been raised - 2287730-202212-M1 | | | | | |

| 11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any) | | | | |
|--|-------------|----------------------------------|-------------------------|------------------------|
| No. | Buyers Name | PalmTrace Trading License Number | Certified CPO Sold (MT) | Certified PK Sold (MT) |
| 1 | xxx | TR-87ea97a5-f61e | 53.98 | - |
| 2 | xxx | TR-76f2bbb2-255f | 35.11 | - |
| 3 | xxx | TR-e247a46d-cbdf | 200 | - |
| 4 | xxx | TR-15a6da7a-2075 | 200 | - |
| 5 | xxx | TR-82495e47-ca0e | 200 | - |
| 6 | xxx | TR-6290d355-50a4 | 200 | - |
| 7 | xxx | TR-fcf052f0-4809 | 200 | - |
| 8 | xxx | TR-0fe5ff4f-0743 | 200 | - |
| 9 | xxx | TR-a55bf54a-43d1 | 158.97 | - |

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| | | | | |
|----|-----|------------------|-------|--------|
| 10 | xxx | TR-442270ed-9e25 | 7.28 | - |
| 11 | xxx | TR-a6ae3fcb-4b1c | 59.08 | - |
| 12 | xxx | TR-72426cc0-42e7 | 40 | - |
| 13 | xxx | TR-2cf2d211-b20d | - | 63.14 |
| 14 | xxx | TR-e389baa5-0150 | - | 168.52 |
| 15 | xxx | TR-8c93d9fd-30bc | - | 186.01 |
| 16 | xxx | TR-ee337f44-cba6 | - | 143.99 |
| 17 | xxx | TR-7f9a35a7-1ea4 | - | 300 |
| 18 | xxx | TR-e0bf05a6-2a8a | - | 87.65 |
| 19 | xxx | TR-d9435c1c-e7ec | - | 112.35 |
| 20 | xxx | TR-2ca1db02-fcb5 | - | 400 |
| 21 | xxx | TR-1df4e5d0-cd02 | - | 200 |
| 22 | xxx | TR-51e0197a-04db | - | 87.94 |
| 23 | xxx | TR-48f28543-64d2 | - | 62.06 |
| 24 | xxx | TR-62863f3a-8d98 | - | 200 |
| 25 | xxx | TR-7d88c254-7543 | - | 3.33 |
| 26 | xxx | TR-1606bb9b-9a31 | - | 196.67 |
| 27 | xxx | TR-0f09e044-a421 | - | 9.4 |
| 28 | xxx | TR-ac7d45af-1ad2 | - | 215 |
| 29 | xxx | TR-434b3c67-5fd7 | - | 200 |
| 30 | xxx | TR-f26a7cca-4703 | - | 16 |
| 31 | xxx | TR-590303da-74ee | - | 184 |
| 32 | xxx | TR-6f729d3a-52fe | - | 300 |
| 33 | xxx | TR-ddec102f-4789 | - | 75.19 |
| 34 | xxx | TR-ae8a84d5-1c08 | - | 100 |
| 35 | xxx | TR-8860d3bc-79e1 | - | 324.81 |
| 36 | xxx | TR-a3778551-a803 | - | 400 |
| 37 | xxx | TR-c3ef13c5-b1d0 | - | 121.38 |
| 38 | xxx | TR-ca155ced-142d | - | 398.62 |
| 39 | xxx | TR-dad33e19-6541 | - | 685.74 |
| 40 | xxx | TR-65ac3d7f-6259 | - | 300 |
| 41 | xxx | TR-0b6853b9-902f | - | 500 |
| 42 | xxx | TR-6d13032f-d852 | - | 250 |
| 43 | xxx | TR-36879807-44f3 | - | 221.88 |

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| | | | | |
|--------------|-----|------------------|----------|----------|
| 44 | xxx | TR-82981e6f-5ebd | - | 178.12 |
| 45 | xxx | TR-39ac2383-6581 | - | 305.75 |
| 46 | xxx | TR-d1164fe5-5782 | - | 168.34 |
| 47 | xxx | TR-0a57d168-e192 | - | 399.81 |
| TOTAL | | | 1,554.42 | 7,565.70 |

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

| 11C. Records of CPO & PK Sold as conventional since the last audit (if any) | | | |
|---|-------------|---------------|--------------|
| No. | Buyers Name | CPO Sold (MT) | PK Sold (MT) |
| 1. | xxx | 14,513.66 | - |
| TOTAL | | 14,513.66 | - |

| 11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any) | | | |
|---|-------------|----------------------------------|------------------------------------|
| No. | Buyers Name | PalmTrace Trading License Number | RSPO Credits of Certified CPO Sold |
| 1 | xxx | ST-TR-a04a7e18-ccd4 | 7,000 |
| TOTAL | | | |

| 12. Independent Smallholders Certified Tonnage (MT) / Volume | | | | | | | | | |
|--|---------------------------|------|------|--------------|------|------|----------------|------|------|
| Phase | Estimated last year (Nil) | | | Actual (Nil) | | | Forecast (Nil) | | |
| | Eligibility | MS A | MS B | Eligibility | MS A | MS B | Eligibility | MS A | MS B |
| | 40% | 70% | 100% | 40% | 70% | 100% | 40% | 70% | 100% |
| FFB | | | | | | | | | |
| IS-CSPO | | | | | | | | | |
| IS-CSPKO | | | | | | | | | |
| IS-CSPKE | | | | | | | | | |
| CSPK | | | | | | | | | |

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

| 13. Independent Smallholders Actual Sold Tonnage / Volume | | | | | | | |
|---|-----|------------------|-------------------|---------|------|----------|----------|
| | FFB | FFB Conventional | FFB Other schemes | IS-CSPO | CSPK | IS-CSPKO | IS-CSPKE |
| Current License period (Nil) | | | | | | | |
| Credits | | | | | | | |
| Physical | | | | | | | |
| Previous License period (Nil) | | | | | | | |
| Credits | | | | | | | |
| Physical | | | | | | | |

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

Section 2: Assessment Process

Certification Body:

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

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

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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 **12-16/12/2022**. The audit programme is included as Section 2.3.

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

The Critical NC close out off-site assessment was conducted on **24/2/2023**. The audit programs are included in Section 2.3. This offsite assessment close major NC was done remotely using Microsoft Team meeting for interview and document review. For site verification, the video call have been used for ensure the implementation was conducted as per corrective action plan.

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

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

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

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

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

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

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

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

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

| Assessment Program | | | | | |
|--------------------------------------|---|----------------------------|----------------------------|----------------------------|----------------------------|
| Name (Mill / Supply Base) | Year 1 (Recertification 2) | Year 2 (ASA2_1) | Year 3 (ASA2_2) | Year 4 (ASA2_3) | Year 5 (ASA2_4) |
| Hadapan POM | √ | √ | √ | √ | √ |
| Kulai Estate | √ | √ | √ | √ | √ |
| Layang Estate | √ | √ | √ | √ | √ |
| Seri Pulai Estate | √ | √ | √ | √ | √ |
| CEP Rengam Estate | √ | √ | √ | √ | √ |

Tentative Date of Next Visit: December 11, 2023 - December 15, 2023

Total Number of Mandays: 15 mandays

2.2 BSI Assessment Team

| Name | Role | Competency |
|---------------------------|-------------|---|
| Muhamad Naquiuddin Mazeli | Team Leader | <p>Education: He holds Bachelor Science Horticulture, graduated from UPM</p> <p>Work Experience: 11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, he managed, implement and monitors the RSPO, ISCC, MSPO and ISO9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company.</p> <p>Training attended: ISO 9001: 2015 LA Training(2019), ISO 14001: 2015 LA Training (2018), ISO 45001: 2018 LA Training (2018), HCV & HCS Training (2019), RSPO P&C LA Training(2018), MSPO LA Training (2018), SMETA Training (2021)</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety & health, workers consultation and SCC for CPO mill.</p> |

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|----------------------------------|-------------|---|
| | | <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English Language.</p> |
| Mohamed Hidhir bin Zainal Abidin | Team Member | <p>Education: He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006.</p> <p>Work Experience: He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia.</p> <p>Training attended: He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of legal, estate & mill best practices, Smallholders inclusion, legal requirements, environment, RSPO supply chain and HCV.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English Language.</p> |
| Mohd Nor Amin Mohd Halim | Team Member | <p>Education: He holds Diploma Office Management & Technology, graduated from UiTM</p> <p>Work Experience: He gained his career as sustainability practitioner in Government Link Company related to palm oil plantation for over 6 years and 10 months majorly handling operational excellent, environment, safety and health at the upstream and downstream operations. He then joining an international certification body over the last 3 years and started his auditing career as qualified lead auditor for MSPO (OPMC and SCCS) scheme; and qualified auditor for ISCC Waste and Residue scheme. Concurrent, he was also a document controller and scheme coordinator for MSPO (OPMC and SCCS) prior to DSM accreditation.</p> <p>Training attended: He has completed Exemplar IMS (9001, 14001 & 45001) LA Course (2019), SA 8000 Course (2019), Endorse MSPO SCCS Course (2020), Endorse MSPO LA Course (2020), Endorse ISCC Waste and Residue Course (2020), HCV & HCS Course (2020), Endorse ISCC Basic & PLUS Course (2022), CQI & IRCA</p> |

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|-----|---------------|--|
| | | <p>ISO 14001:2015 LA Course (2022), Endorse RSPO P&C LA Course (2022). Aspect covered in this audit:</p> <p>Aspect covered in this audit: Social and worker’s welfare, stakeholder consultation, social impact and management plan etc.</p> <p>Language proficiency: English and Bahasa</p> |
| Nil | Peer Reviewer | <p>Education:</p> <p>Work Experience:</p> <p>Training attended:</p> |

Accompanying Persons:

| Name | Role |
|------|------|
| Nil | |

2.3 Assessment Plan

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

| Date | Time | Subjects | (MNM) | (MHZ) | (MNA) |
|--|---------------|---|-------|-------|-------|
| Sunday, 11/12/2022 | PM | Audit Team Travelling to Anika Hotel, Kluang | √ | √ | √ |
| Monday, 12/12/2022 CEP Renggam Estate | 08.30 – 09.00 | Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan | √ | √ | √ |
| | 09.00 – 12.30 | Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. | √ | √ | √ |
| | 09.30 – 12.30 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | | | √ |
| | 12.30 – 13.30 | Lunch | √ | √ | √ |

| Date | Time | Subjects | (MNM) | (MHZ) | (MNA) |
|--|---------------|--|-------|-------|-------|
| | 13.30 – 16.30 | Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.) | √ | √ | √ |
| | 16.30 - 17.00 | Interim Closing briefing. | √ | √ | √ |
| Tuesday, 13/12/2022 Kulai Estate | 08.30 – 12.30 | Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. | √ | √ | √ |
| | 09.00 – 13.30 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | | | √ |
| | 12.30 – 13.30 | Lunch | √ | √ | √ |
| | 13.30 - 16.30 | Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.) | √ | √ | √ |
| | 16.30 - 17.00 | Interim Closing briefing. | √ | √ | √ |
| Wednesday, 14/12/2022 Hadapan POM | 09.00 – 12.30 | Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc. | √ | √ | √ |
| | 09.30 – 12.30 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | | | √ |
| | 12.30 – 13.30 | Lunch | √ | √ | √ |

| Date | Time | Subjects | (MNM) | (MHZ) | (MNA) |
|--|---------------|---|-------|-------|-------|
| | 13.30 – 16.30 | Lab, weighbridge and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records. | √ | √ | √ |
| | 16.30 – 17.00 | Interim closing briefing | √ | √ | √ |
| Thursday, 15/12/2022 Layang Estate | 09.00 – 12.30 | Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. | √ | √ | √ |
| | 09.30 – 12.30 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | | | √ |
| | 12.30 – 13.30 | Lunch | √ | √ | √ |
| | 13.30 – 16.30 | Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.) | √ | √ | √ |
| | 16.30 – 17.00 | Interim closing briefing | √ | √ | √ |
| Friday, 16/12/2022 Seri Pulau Estate | 09.00 – 12.30 | Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. | √ | √ | √ |
| | 09.30 – 12.30 | Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.) | | | √ |
| | 12.30 – 13.30 | Lunch | √ | √ | √ |

| Date | Time | Subjects | (MNM) | (MHZ) | (MNA) |
|------|---------------|---|-------|-------|-------|
| | 13.30 – 16.30 | Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.) | √ | √ | √ |
| | 16.30 – 17.00 | Preparing for closing meeting | √ | √ | √ |
| | 17.00-17.30 | Closing Meeting | √ | √ | √ |

NCR Closure Audit Plan

| Date | Time | Subjects | MNM | ICT Planned |
|-----------------------|-------------|---|-----|---|
| Friday, 24/02/2023 | 0900 - 0930 | Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder’s/workers consultation). | √ | Microsoft teams, Skype, Webex, Telecon, Face-time, email and whatapps |
| | 0930 - 1200 | Verification on Major NC. Site observation ,workers interview (individual and group session) if necessary Document review – implemented evidence for closure NC below:- 2287730-202212-M2 3.3.2 involve HIRARC incharge 2287730-202212-M3 7.2.11 involve store keeper 2287730-202212-M1 3.8.12 (iv) (a) involve Mill PIC and supply chain PIC | √ | Microsoft teams, Skype, Webex, Telecon, Face-time, email and whatapps |
| | 1200-1230 | Closing | √ | Microsoft teams, Skype, Webex, Telecon, Face-time, email and whatapps |

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

| Requirement | Assessment | Compliance |
|---|--|-----------------|
| <p>Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?</p> | <p>Yes. SDP TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI):</p> <p>http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</p> | <p>Complied</p> |
| <p>Have all the estates and mills certified within five (5) years after obtaining RSPO membership?</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021</p> | <p>Yes. All estates and mill has been certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 1st Oct 2018, the mill has completed the selling off transaction.</p> <p>In Indonesia, PT Mitral Austral Sejahtera was sold and currently SDP have no control in the management.</p> | <p>Complied</p> |
| <p>Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.</p> | <p>No. There is no new acquisitions as at latest TBP 2022.</p> | <p>Complied</p> |
| <p>Any deviations from the maximum periods requires approval by the RSPO Secretariat.</p> | <p>Although there are deviation has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.</p> | <p>Complied</p> |
| <p>Have there been any changes to the time-bound plan since the last audit</p> | <p>Yes.</p> | <p>Complied</p> |

| | | |
|--|--|-----------------|
| <p>(both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p> | <p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties was sold and currently Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019. Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: www.rspo.org/certification/public-announcement</p> <p>For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations. ACOP 2020 has been cross-referenced as below: www.rspo.org/members/29</p> | |
| <p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p> | <p>Although there lapses has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.</p> | <p>Complied</p> |
| <p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p> | <p>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as these 2 assets were disposed.</p> | <p>Complied</p> |
| <p>Un-Certified Units or Holdings</p> | | |
| <p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in</p> | <p>There was no changes from the previous audit based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to</p> | <p>Complied</p> |

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| | | |
|--|---|-----------------|
| <p>accordance with RSPO P&C criterion 7.12.</p> | <p>awaiting to receive land titles at the Indonesia management units</p> | |
| <p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p> | <p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification</p> <ol style="list-style-type: none"> 1. NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyplantation-berhad-nbpol-poliamba-limited 2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-a-subsiary-of-sime-darby-plantationbhd-guadalcanal-plain-palm-oil-ltd 3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-ramuagri-industries-ltd 4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-ramu-agri-industries-limited 5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-higaturu-oil-palms 6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO Website https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamawan-png 7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO Website https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamendauen-png 8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-roka-mini-estate 9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-j-estate | <p>Complied</p> |

| | | |
|---|--|-----------------|
| | <p>plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-j-estate</p> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-limited-higaturu-oil-palm</p> <p>11. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc-new-planting-assessment</p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment1</p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment</p> <p>Management units for 11 – 13 above were disposed.</p> | |
| <p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p> | <p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as both sites was disposed.</p> <p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancy between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of August 2022, 16 LUCAs review completed with remaining 8 concept note required, 7 concept note approved by RSPO and 1 Concept note endorsed.</p> | <p>Complied</p> |
| <p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p> | <p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism</p> | <p>Complied</p> |
| <p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p> | <p>Sime Darby Plantation maintain corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.</p> | <p>Complied</p> |
| <p>Did the company conduct internal audit for those uncertified estates</p> | <p>Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status</p> | <p>Complied</p> |

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| 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. | of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue are mainly awaiting for Land Titles. The last audit was conducted on July 2022. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance. | |
| Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO? | No any critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates. | Complied |
| Have there been any stakeholder (including NGO) consultation conducted? | Respective sites maintained stakeholder engagements as part of the estates/mills operations especially in Indonesia, socialization of company | Complied |

3.2 Progress of scheme smallholders and/or outgrowers

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

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Approved Time Bound Plan

| Name of the Unit of Certification (UoC) | Country | Name of the Mills and Supply Bases | Location Address | GPS Coordinates (in decimal degree) | | Total Managed Area (Ha) | Certification Status (Certified / Not certified) | Plan Year for Certification | Actual Certification Year | Date of Last TBP Verified and Approved by CB |
|---|-----------|------------------------------------|-----------------------------|-------------------------------------|------------|-------------------------|--|-----------------------------|---------------------------|--|
| | | | | Latitude | Longitude | | | | | |
| Manggala | Indonesia | Manggala Mill | Rokan Hilir District - Riau | 1.521111 | 100.727778 | 13.836 | Certified | Not Applicable | 23-Nov-10 | 19-20 July 2021 |
| Manggala | Indonesia | Manggala -1 Estate | Rokan Hilir District - Riau | 1.535278 | 100.730000 | 4.919 | Certified | Not Applicable | 23-Nov-10 | 19-20 July 2021 |
| Manggala | Indonesia | Manggala -2 Estate | Rokan Hilir District - Riau | 1.531667 | 100.643889 | 4.922 | Certified | Not Applicable | 23-Nov-10 | 19-20 July 2021 |
| Manggala | Indonesia | Manggala -3 Estate | Rokan Hilir District - Riau | 1.473056 | 100.758889 | 3.995 | Certified | Not Applicable | 23-Nov-10 | 19-20 July 2021 |
| Alur Dumai | Indonesia | Alur Dumai Mill | Rokan Hilir District - Riau | 1.561111 | 100.541667 | 3.759 | Certified | Not Applicable | 16-Jan-12 | 19-20 July 2021 |
| Alur Dumai | Indonesia | Alur Dumai Estate | Rokan Hilir District - Riau | 1.561111 | 100.541667 | 3.759 | Certified | Not Applicable | 16-Jan-12 | 19-20 July 2021 |
| Teluk Siak | Indonesia | Teluk Siak Mill | Siak District - Riau | 0.591389 | 101.658889 | 11,555.31 | Certified | Not Applicable | 11-Oct-11 | 19-20 July 2021 |

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|-------------|-----------|----------------------------|--|--------------|----------------|--------------|-----------|----------------|---------------|-----------------------|
| Teluk Siak | Indonesia | Teluk Siak Estate | Siak District - Riau | 0.5858 33 | 101.61 6944 | 3,321. 20 | Certified | Not Applicable | 11- Oct-11 | 19-20 July 2021 |
| Teluk Siak | Indonesia | Pinang Sebatang Estate | Siak District - Riau | 0.5430 56 | 101.57 5000 | 3,799. 21 | Certified | Not Applicable | 11- Oct-11 | 19-20 July 2021 |
| Teluk Siak | Indonesia | Aneka Persada Estate | Siak District - Riau | 0.6263 89 | 101.65 5833 | 4,434. 90 | Certified | Not Applicable | 11- Oct-11 | 19-20 July 2021 |
| Blang Simpo | Indonesia | Blang Simpo Mill | Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam | 4.7083 33 | 97.840 556 | 8,777. 22 | Certified | Not Applicable | 3-May- 13 | 19-20 July 2021 |
| Blang Simpo | Indonesia | Blang Simpo -1 Estate | Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam | 4.6969 44 | 97.837 222 | 3,460. 06 | Certified | Not Applicable | 3-May- 13 | 19-20 July 2021 |
| Blang Simpo | Indonesia | Blang Simpo -2 Estate | Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam | 4.6850 00 | 97.817 500 | 2,677. 83 | Certified | Not Applicable | 3-May- 13 | 19-20 July 2021 |
| Blang Simpo | Indonesia | Tamiang (PT PPP) Estate | Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam | 4.3066 67 | 98.026 944 | 1,451. 99 | Certified | Not Applicable | 3-May- 13 | 19-20 July 2021 |
| Blang Simpo | Indonesia | Batang Ara (PT PSK) Estate | Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam | 4.2900 00 | 98.013 333 | 1,187. 34 | Certified | Not Applicable | 3-May- 13 | 19-20 July 2021 |

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|---------------|-----------|----------------------|--------------------------------------|-----------|------------|-----------|-----------|----------------|-----------|-----------------|
| Teluk Bakau | Indonesia | Teluk Bakau Mill | Indragiri Hilir District - Riau | 0.256389 | 103.58889 | 13,317.81 | Certified | Not Applicable | 11-Oct-11 | 19-20 July 2021 |
| Teluk Bakau | Indonesia | Teluk Bakau Estate | Indragiri Hilir District - Riau | 0.192500 | 103.596944 | 4,025.07 | Certified | Not Applicable | 11-Oct-11 | 19-20 July 2021 |
| Teluk Bakau | Indonesia | Nusa Lestari Estate | Indragiri Hilir District - Riau | 0.185278 | 103.568056 | 3,456.74 | Certified | Not Applicable | 11-Oct-11 | 19-20 July 2021 |
| Teluk Bakau | Indonesia | Nusa Perkasa Estate | Indragiri Hilir District - Riau | 0.117222 | 103.605278 | 5,836.00 | Certified | Not Applicable | 11-Oct-11 | 19-20 July 2021 |
| Mandah | Indonesia | Mandah Mill | Indragiri Hilir District - Riau | 0.115833 | 103.549167 | 12,366.18 | Certified | Not Applicable | 1-Apr-14 | 19-20 July 2021 |
| Mandah | Indonesia | Mandah Estate | Indragiri Hilir District - Riau | 0.135278 | 103.547500 | 5,053.18 | Certified | Not Applicable | 1-Apr-14 | 19-20 July 2021 |
| Mandah | Indonesia | Rotan Semelur Estate | Indragiri Hilir District - Riau | 0.117778 | 103.604722 | 7,313.00 | Certified | Not Applicable | 1-Apr-14 | 19-20 July 2021 |
| Sungai Pinang | Indonesia | Sungai Pinang Mill | Musi Rawas District - South Sumatera | -2.984722 | 103.405833 | 6.513 | Certified | Not Applicable | 11-Sep-12 | 19-20 July 2021 |
| Sungai Pinang | Indonesia | Sungai Pinang Estate | Musi Rawas District - South Sumatera | -2.986944 | 103.406944 | 3,374.42 | Certified | Not Applicable | 11-Sep-12 | 19-20 July 2021 |

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|---------------|-----------|----------------------|--------------------------------------|-------------------|----------------|---|---------------|----------------|-----------|-----------------|
| | Indonesia | Sungai Pinang Estate | Musi Rawas District - South Sumatera | - 2.9869 44 | 103.40 6944 | Land legalisation processes for 308.35 ha (Div 1 Bukit Pinang & Div 3 Sungai Pinang) is still in process. | Not Certified | 2023 | | 19-20 July 2021 |
| Sungai Pinang | Indonesia | Bukit Pinang Estate | Musi Rawas District - South Sumatera | - 2.9872 22 | 103.40 5556 | 3,138.58 | Certified | Not Applicable | 11-Sep-12 | 19-20 July 2021 |
| Sungai Pinang | Indonesia | Bukit Pinang Estate | Musi Rawas District - South Sumatera | - 2.9872 22 | 103.40 5556 | Land legalisation processes for 308.35 ha (Div 1 Bukit Pinang | Not Certified | 2023 | | 19-20 July 2021 |

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| | | | | | | g & Div 3 Sungai Pinang) is still in process. | | | | |
| Ladang Panjang | Indonesia | Ladang Panjang Mill | Muaro Jambi District - Jambi | - 1.792500 | 103.793611 | 1,202.04 | Certified | Not Applicable | 9-Jul-12 | 19-20 July 2021 |
| Ladang Panjang | Indonesia | Ladang Panjang Estate | Muaro Jambi District - Jambi | - 1.794167 | 103.799444 | 1,202.04 | Certified | Not Applicable | 9-Jul-12 | 19-20 July 2021 |
| Ladang Panjang | Indonesia | 3.8.13 Estate | Muaro Jambi District - Jambi | - 1.794167 | 103.799444 | Total Areas of Division 1 and 2 (1,796.19 ha) HGU still in process. | Not Certified | 2023 | | |
| Rantau Panjang | Indonesia | Rantau Panjang Mill | Musi Banyuasin District - South Sumatera | - 2.916389 | 103.747778 | 10,139.91 | Certified | Not Applicable | 16-Mar-12 | 19-20 July 2021 |

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| Rantau Panjang | Indonesia | Rantau Panjang Estate | Musi Banyuasin District - South Sumatera | 2.9222 22 | 103.74 5278 | 2,679. 74 | Certified | Not Applicable | 16-Mar-12 | 19-20 July 2021 |
| Rantau Panjang | Indonesia | Bumi Ayu Estate | Musi Banyuasin District - South Sumatera | 2.8969 44 | 103.67 6944 | 2,960. 98 | Certified | Not Applicable | 16-Mar-12 | 19-20 July 2021 |
| Rantau Panjang | Indonesia | Karang Ringin Napal Estate | Musi Banyuasin District - South Sumatera | 2.8597 22 | 103.64 6944 | 4,359. 74 | Certified | Not Applicable | 16-Mar-12 | 19-20 July 2021 |
| Rantau Panjang | Indonesia | Mangun Jaya Estate | Musi Banyuasin District - South Sumatera | 2.8530 56 | 103.57 1111 | 139.4 5 | Certified | Not Applicable | 16-Mar-12 | 19-20 July 2021 |
| Rantau Panjang | Indonesia | Sungai Jernih Estate | Musi Banyuasin District - South Sumatera | 2.9798 33 | 103.80 3500 | 851.5 7 ha under legaliz ation proces s (prose s Kadas tral) | Not Certified | 2023 | | 19-20 July 2021 |
| Angsana | Indonesia | Angsana Mill | Tanah Bumbu District – South Kalimantan | 3.6136 11 | 115.61 0556 | 15,15 1,19 | Certified | Not Applicable | 6-Jul-11 | 19-20 July 2021 |
| Angsana | Indonesia | Angsana Estate | Tanah Bumbu District – South Kalimantan | 3.5322 22 | 115.66 9722 | 3,250. 06 | Certified | Not Applicable | 6-Jul-11 | 19-20 July 2021 |

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|------------|-----------|----------------------|---|----------|------------|-----------|-----------|----------------|-----------|-----------------|
| Angsana | Indonesia | Gunung Sari Estate | Tanah Bumbu District – South Kalimantan | 3.583056 | 115.687500 | 2,826.94 | Certified | Not Applicable | 6-Jul-11 | 19-20 July 2021 |
| Mustika | Indonesia | Mustika Mill | Tanah Bumbu District – South Kalimantan | 3.488611 | 115.738611 | 14,840.76 | Certified | Not Applicable | 3-Jul-13 | 19-20 July 2021 |
| Mustika | Indonesia | Mustika Estate | Tanah Bumbu District – South Kalimantan | 3.488889 | 115.716111 | 3,648.74 | Certified | Not Applicable | 3-Jul-13 | 19-20 July 2021 |
| Mustika | Indonesia | Pantai bonati Estate | Tanah Bumbu District – South Kalimantan | 3.747500 | 115.577500 | 2,534.00 | Certified | Not Applicable | 6-Jul-11 | 19-20 July 2021 |
| Gunung Aru | Indonesia | Gunung Aru Mill | Kotabaru District – South Kalimantan | 3.613611 | 115.610556 | 12,740.54 | Certified | Not Applicable | 5-Jul-11 | 19-20 July 2021 |
| Gunung Aru | Indonesia | Gunung Aru Estate | Kotabaru District – South Kalimantan | 3.504167 | 116.163056 | 2,684.41 | Certified | Not Applicable | 5-Jul-11 | 19-20 July 2021 |
| Gunung Aru | Indonesia | Gunung Kemas Estate | Kotabaru District – South Kalimantan | 3.530000 | 116.183333 | 3,511.36 | Certified | Not Applicable | 5-Jul-11 | 19-20 July 2021 |
| Gunung Aru | Indonesia | Laut Timur Estate | Kotabaru District – South Kalimantan | 3.596944 | 116.205000 | 3,207.28 | Certified | Not Applicable | 5-Jul-11 | 19-20 July 2021 |
| Gunung Aru | Indonesia | Pantai Timur Estate | Kotabaru District – South Kalimantan | 3.606667 | 116.223889 | 3,337.49 | Certified | Not Applicable | 5-Jul-11 | 19-20 July 2021 |
| Ungkaya | Indonesia | Ungkaya Mill | Morowali District – Sulawesi Tengah | 2.222778 | 121.563611 | 4,145.00 | Certified | Not Applicable | 10-Jul-12 | 19-20 July 2021 |

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| Ungkaya | Indonesia | Ungkaya Estate | Morowali District – Sulawesi Tengah | 2.222778 | 121.563611 | 4,145.00 | Certified | Not Applicable | 10-Jul-12 | 19-20 July 2021 |
| Rantau | Indonesia | Rantau Mill | Kotabaru District – South Kalimantan | 2.439167 | 116.114167 | 24,169.56 | Certified | Not Applicable | 30-Dec-11 | 19-20 July 2021 |
| Rantau | Indonesia | Rantau Estate | Kotabaru District – South Kalimantan | 2.445000 | 116.111944 | 4,638.00 | Certified | Not Applicable | 30-Dec-11 | 19-20 July 2021 |
| Rantau | Indonesia | Matalok Estate | Kotabaru District – South Kalimantan | 2.445556 | 116.111944 | 3,082.00 | Certified | Not Applicable | 30-Dec-11 | 19-20 July 2021 |
| Rantau | Indonesia | Selabak Estate (PT SAA) | Kotabaru District – South Kalimantan | 2.442222 | 116.208056 | 3,757.67 | Certified | Not Applicable | 16-Mar-12 | 19-20 July 2021 |
| Rantau | Indonesia | Randi Estate (PT SAA) | Kotabaru District – South Kalimantan | 2.438889 | 116.208611 | 2,882.98 | Certified | Not Applicable | 16-Mar-12 | 19-20 July 2021 |
| Rantau | Indonesia | Sangkoh Estate (PT SAA) | Kotabaru District – South Kalimantan | 2.470556 | 116.237500 | 3,789.34 | Certified | Not Applicable | 16-Mar-12 | 19-20 July 2021 |
| Rantau | Indonesia | Lanting Estate (PT LMR) | Kotabaru District – South Kalimantan | 2.463611 | 116.283611 | 3,249.27 | Certified | Not Applicable | 16-Mar-12 | 19-20 July 2021 |
| Betung | Indonesia | Betung Mill | Kotabaru District – South Kalimantan | 2.378611 | 116.205000 | 7,579.57 | Certified | Not Applicable | 1-Apr-14 | 19-20 July 2021 |
| Betung | Indonesia | Betung Estate | Kotabaru District – South Kalimantan | 2.356667 | 116.195833 | 4,266.00 | Certified | Not Applicable | 1-Apr-14 | 19-20 July 2021 |

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| Betung | Indonesia | Sekayu Estate | Kotabaru District – South Kalimantan | 2.326111 | 116.182778 | 3,313.57 | Certified | Not Applicable | 1-Apr-14 | 19-20 July 2021 |
| Bebunga | Indonesia | Bebunga Mill | Kotabaru District – South Kalimantan | 2.373611 | 116.329722 | 14,274.77 | Certified | Not Applicable | 16-Mar-12 | 19-20 July 2021 |
| Bebunga | Indonesia | Bebunga Estate | Kotabaru District – South Kalimantan | 2.383611 | 116.334444 | 3,958.43 | Certified | Not Applicable | 16-Mar-12 | 19-20 July 2021 |
| Bebunga | Indonesia | Bakau Estate | Kotabaru District – South Kalimantan | 2.420556 | 116.328333 | 5,342.14 | Certified | Not Applicable | 16-Mar-12 | 19-20 July 2021 |
| Bebunga | Indonesia | Sungai Cengal Estate | Kotabaru District – South Kalimantan | 2.406111 | 116.363056 | 4,974.20 | Certified | Not Applicable | 16-Mar-12 | 19-20 July 2021 |
| Pondok Labu | Indonesia | Pondok Labu Mill | Kotabaru District – South Kalimantan | 2.459167 | 116.518889 | 15,876.20 | Certified | Not Applicable | 16-Mar-12 | 19-20 July 2021 |
| Pondok Labu | Indonesia | Pondok Labu Estate | Kotabaru District – South Kalimantan | 2.412500 | 116.510000 | 3,569.53 | Certified | Not Applicable | 16-Mar-12 | 19-20 July 2021 |
| Pondok Labu | Indonesia | Binturung Estate | Kotabaru District – South Kalimantan | 2.440833 | 116.442222 | 4,072.01 | Certified | Not Applicable | 16-Mar-12 | 19-20 July 2021 |
| Pondok Labu | Indonesia | Rampa Estate | Kotabaru District – South Kalimantan | 2.452500 | 116.436389 | 3,656.20 | Certified | Not Applicable | 16-Mar-12 | 19-20 July 2021 |
| Pondok Labu | Indonesia | Sesulung Estate | Kotabaru District – South Kalimantan | 2.494444 | 116.510556 | 4,578.46 | Certified | Not Applicable | 16-Mar-12 | 19-20 July 2021 |

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|-------------|-----------|---------------------|---|-------------------|----------------|---------------|-----------|----------------|---------------|-----------------------|
| Sekunyir | Indonesia | Sekunyir Mill | Seruyan and West Kotawaringin District – Central Kalimantan | - 2.4447 22 | 112.00 6944 | 7,734. 59 | Certified | Not Applicable | 23- Nov-10 | 19-20 July 2021 |
| Sekunyir | Indonesia | Sekunyir Estate | Seruyan and West Kotawaringin District – Central Kalimantan | - 2.4466 67 | 112.00 8889 | 3,555. 19 | Certified | Not Applicable | 23- Nov-10 | 19-20 July 2021 |
| Sekunyir | Indonesia | Seruyan Estate | Seruyan and West Kotawaringin District – Central Kalimantan | - 2.4077 78 | 112.06 8056 | 4,179. 40 | Certified | Not Applicable | 23- Nov-10 | 19-20 July 2021 |
| Sukamandang | Indonesia | Sukamandang Mill | Seruyan and East Kotawaringin District – Central Kalimantan | - 2.0577 78 | 112.31 6944 | 14,77 9.92 | Certified | Not Applicable | 5-Jul- 11 | 19-20 July 2021 |
| Sukamandang | Indonesia | Sukamandang Estate | Seruyan and East Kotawaringin District – Central Kalimantan | - 2.0655 56 | 112.31 3333 | 3,936. 56 | Certified | Not Applicable | 5-Jul- 11 | 19-20 July 2021 |
| Sukamandang | Indonesia | Sapiri Estate | Seruyan and East Kotawaringin District – Central Kalimantan | - 2.0238 89 | 112.34 7778 | 3,530. 90 | Certified | Not Applicable | 5-Jul- 11 | 19-20 July 2021 |
| Sukamandang | Indonesia | Baras Danum Estate | Seruyan and East Kotawaringin District – Central Kalimantan | - 2.0800 00 | 112.38 1111 | 3,664. 60 | Certified | Not Applicable | 5-Jul- 11 | 19-20 July 2021 |
| Sukamandang | Indonesia | Kuala Kuayan Estate | Seruyan and East Kotawaringin District – Central Kalimantan | - 2.0794 44 | 112.35 2778 | 3,647. 86 | Certified | Not Applicable | 5-Jul- 11 | 19-20 July 2021 |
| Pemantang | Indonesia | Pemantang Mill | Seruyan and East Kotawaringin District – Central Kalimantan | - 2.1483 33 | 112.29 2778 | 16,60 1.66 | Certified | Not Applicable | 5-Jul- 11 | 19-20 July 2021 |
| Pemantang | Indonesia | Pemantang Estate | Seruyan and East Kotawaringin District – Central Kalimantan | - 2.1580 56 | 112.29 0556 | 3,857. 91 | Certified | Not Applicable | 5-Jul- 11 | 19-20 July 2021 |

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| Pematang | Indonesia | Kawan Batu Estate | Seruyan and East Kotawaringin District – Central Kalimantan | 2.161111 | 112.385278 | 4,400.00 | Certified | Not Applicable | 5-Jul-11 | 19-20 July 2021 |
| Pematang | Indonesia | Hatantiring Estate | Seruyan and East Kotawaringin District – Central Kalimantan | 2.116111 | 112.293333 | 3,811.00 | Certified | Not Applicable | 5-Jul-11 | 19-20 July 2021 |
| Pematang | Indonesia | Batang Garing Estate | Seruyan and East Kotawaringin District – Central Kalimantan | 2.157778 | 112.420833 | 4,532.75 | Certified | Not Applicable | 5-Jul-11 | 19-20 July 2021 |
| Lembiru | Indonesia | Lembiru Mill | Ketapang District – West Kalimantan | 2.168889 | 110.673889 | 9,409.07 | Certified | Not Applicable | 3-Jul-14 | 19-20 July 2021 |
| Lembiru | Indonesia | Lembiru Estate | Ketapang District – West Kalimantan | 2.164722 | 110.687778 | 4,929.49 | Certified | Not Applicable | 3-Jul-14 | 19-20 July 2021 |
| Lembiru | Indonesia | Awatan Estate | Ketapang District – West Kalimantan | 2.215278 | 110.681944 | 3,476.79 | Certified | Not Applicable | 3-Jul-14 | 19-20 July 2021 |
| Lembiru | Indonesia | Pelanjau Estate (PT BAL) | Ketapang District – West Kalimantan | 2.227778 | 110.621944 | 1,002.79 | Certified | Not Applicable | 3-Jul-19 | 19-20 July 2021 |
| Lembiru | Indonesia | Karya Palma Estate | Ketapang District – West Kalimantan | 2.170592 | 110.726528 | | Pending confirmation from BPN on HGU | Not Certified | 2023 | 19-20 July 2021 |

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| | | | | | | document | | | | |
| Lembiru | Indonesia | Beturus Estate (PT BAL) | Ketapang District – West Kalimantan | - 2.1744 44 | 110.65 9722 | HGU was obtained however BPN never release the HGU to the company | Not Certified | 2023 | | 19-20 July 2021 |
| Bukit Ajong | Indonesia | Bukit Ajong Mill | Sanggau District –West Kalimantan | 0.2694 44 | 110.48 2778 | 11,49 8.82 | Certified | Not Applicable | 18- Oct-10 | 19-20 July 2021 |
| Bukit Ajong | Indonesia | West Estate | Sanggau District –West Kalimantan | 0.2716 67 | 110.40 5833 | 4,562. 34 | Certified | Not Applicable | 18- Oct-10 | 19-20 July 2021 |
| Bukit Ajong | Indonesia | East Estate | Sanggau District –West Kalimantan | 0.2561 11 | 110.50 2500 | 2,665. 48 | Certified | Not Applicable | 18- Oct-10 | 19-20 July 2021 |

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| Bukit Ajong | Indonesia | East/Sei Mawang Estate | Sanggau District –West Kalimantan | 0.1552 24 | 110.53 2656 | Land legalization processes for East Esatate for 6123.7 ha under processes | Not Certified | 2023 | | 19-20 July 2021 |
| Sg. Dingin | Malaysia | Sungai Dingin Oil Mill | Karangan, Kedah | 5.3947 34 | 100.71 0604 | 19,51 7.17 | Certified | Not Applicable | 12- Aug-10 | 19-20 July 2021 |
| Sg. Dingin | Malaysia | Anak Kulim Estate | Karangan, Kedah | 5.3017 31 | 100.58 9053 | 1,523. 35 | Certified | Not Applicable | 12- Aug-10 | 19-20 July 2021 |
| Sg. Dingin | Malaysia | Sungai Dingin Estate | Karangan, Kedah | 5.3745 39 | 100.72 3497 | 4,244. 03 | Certified | Not Applicable | 12- Aug-10 | 19-20 July 2021 |
| Sg. Dingin | Malaysia | Somme Estate | Karangan, Kedah | 5.2470 43 | 100.62 4650 | 941.5 6 | Certified | Not Applicable | 12- Aug-10 | 19-20 July 2021 |
| Sg. Dingin | Malaysia | Bukit Selarong Estate | Karangan, Kedah | 5.5059 48 | 100.60 8351 | 3,896. 17 | Certified | Not Applicable | 12- Aug-10 | 19-20 July 2021 |
| Sg. Dingin | Malaysia | Padang Buluh Estate | Karangan, Kedah | 5.6734 33 | 100.54 3599 | 4,008. 47 | Certified | Not Applicable | 12- Aug-10 | 19-20 July 2021 |

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| Sg. Dingin | Malaysia | Bukit Hijau Estate | Karangan, Kedah | 5.6003 25 | 100.71 7128 | 2,725. 00 | Certified | Not Applicable | 12- Aug-10 | 19-20 July 2021 |
| Sg. Dingin | Malaysia | Jentayu Estate | Karangan, Kedah | 5.7729 15 | 100.58 7191 | 2,178. 59 | Certified | Not Applicable | 12- Aug-10 | 19-20 July 2021 |
| Chersonese | Malaysia | Chersonese Oil Mill | Kuala Kurau, Perak | 4.9784 57 | 100.46 1902 | 11,09 9.36 | Certified | Not Applicable | 5-Oct- 11 | 19-20 July 2021 |
| Chersonese | Malaysia | Chersonese Estate | Kuala Kurau, Perak | 4.9878 86 | 100.45 6169 | 3,293. 72 | Certified | Not Applicable | 5-Oct- 11 | 19-20 July 2021 |
| Chersonese | Malaysia | Kalumpong Estate | Kuala Kurau, Perak | 4.9576 56 | 100.56 6418 | 2,716. 80 | Certified | Not Applicable | 5-Oct- 11 | 19-20 July 2021 |
| Chersonese | Malaysia | Tali Ayer Estate | Kuala Kurau, Perak | 5.0814 77 | 100.52 3402 | 3,756. 10 | Certified | Not Applicable | 5-Oct- 11 | 19-20 July 2021 |
| Chersonese | Malaysia | Holyrood Estate | Kuala Kurau, Perak | 5.1395 87 | 100.71 2109 | 1,332. 74 | Certified | Not Applicable | 5-Oct- 11 | 19-20 July 2021 |
| Elphil | Malaysia | Elphil Oil Mill | Sg Siput, Perak | 4.8907 87 | 101.09 2768 | 6,814. 60 | Certified | Not Applicable | 18- Jun-11 | 19-20 July 2021 |
| Elphil | Malaysia | Kamuning Estate | Sg Siput, Perak | 4.8505 52 | 101.03 1803 | 3,888. 43 | Certified | Not Applicable | 18- Jun-11 | 19-20 July 2021 |
| Elphil | Malaysia | Elphil Estate | Sg Siput, Perak | 4.8487 28 | 101.10 2094 | 1,865. 43 | Certified | Not Applicable | 18- Jun-11 | 19-20 July 2021 |

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| Elphil | Malaysia | Kinta Kellas Estate | Sg Siput, Perak | 4.4598 69 | 101.08 7714 | 1,060. 74 | Certified | Not Applicable | 18-Jun-11 | 19-20 July 2021 |
| Flemington | Malaysia | Flemington Oil Mill | Teluk Intan, Perak | 3.9286 62 | 100.85 6590 | 11,22 6.23 | Certified | Not Applicable | 5-Oct-11 | 19-20 July 2021 |
| Flemington | Malaysia | Flemington Estate | Teluk Intan, Perak | 3.9017 45 | 100.90 5976 | 1,906. 84 | Certified | Not Applicable | 5-Oct-11 | 19-20 July 2021 |
| Flemington | Malaysia | Bagan Datoh Estate | Teluk Intan, Perak | 3.9878 67 | 100.81 5889 | 3,781. 86 | Certified | Not Applicable | 5-Oct-11 | 19-20 July 2021 |
| Flemington | Malaysia | Sabak Bernam Estate | Teluk Intan, Perak | 3.7549 99 | 101.01 4455 | 2,511. 79 | Certified | Not Applicable | 5-Oct-11 | 19-20 July 2021 |
| Flemington | Malaysia | Sg. Samak Estate | Teluk Intan, Perak | 3.7741 42 | 101.15 8366 | 3,025. 74 | Certified | Not Applicable | 5-Oct-11 | 19-20 July 2021 |
| Seri Intan/Selaba | Malaysia | Seri Intan Oil Mill | Teluk Intan, Perak | 3.9690 97 | 100.98 5458 | 14,47 4.29 | Certified | Not Applicable | 3-Mar-11 | 19-20 July 2021 |
| Seri Intan/Selaba | Malaysia | Selaba Oil Mill | Teluk Intan, Perak | 3.9896 99 | 101.08 1201 | 1,549. 75 | Certified | Not Applicable | 3-Mar-11 | 19-20 July 2021 |
| Seri Intan/Selaba | Malaysia | Seri Intan (+ Selaba) Estate | Teluk Intan, Perak | 3.9627 35 | 101.01 6490 | 4,013. 16 | Certified | Not Applicable | 3-Mar-11 | 19-20 July 2021 |
| Seri Intan/Selaba | Malaysia | Sabrang Estate | Teluk Intan, Perak | 4.0111 92 | 100.96 0478 | 3,945. 23 | Certified | Not Applicable | 3-Mar-11 | 19-20 July 2021 |

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| Seri Intan/Selaba | Malaysia | Sogomana Estate | Teluk Intan, Perak | 4.3876 16 | 100.70 1262 | 2,214. 08 | Certified | Not Applicable | 3-Mar-11 | 19-20 July 2021 |
| Seri Intan/Selaba | Malaysia | Sg. Wangi Estate | Teluk Intan, Perak | 4.2808 12 | 100.74 3135 | 2,226. 66 | Certified | Not Applicable | 3-Mar-11 | 19-20 July 2021 |
| Seri Intan/Selaba | Malaysia | Bikam Estate | Teluk Intan, Perak | 4.0170 65 | 101.31 7302 | 2,075. 16 | Certified | Not Applicable | 3-Mar-11 | 19-20 July 2021 |
| Seri Intan/Selaba | Malaysia | Cluny (+ Bedford) Estate | Teluk Intan, Perak | 3.8579 21 | 101.43 4059 | 1,549. 75 | Certified | Not Applicable | 3-Mar-11 | 19-20 July 2021 |
| Tennamaram | Malaysia | Tennamaram Oil Mill | Bestari Jaya, Selangor | 3.3965 01 | 101.41 8491 | 10,70 6.26 | Certified | Not Applicable | 3-Mar-11 | 19-20 July 2021 |
| Tennamaram | Malaysia | Tennamaram Estate | Bestari Jaya, Selangor | 3.4139 60 | 101.41 6127 | 1,981. 60 | Certified | Not Applicable | 3-Mar-11 | 19-20 July 2021 |
| Tennamaram | Malaysia | Sungai Buluh Estate | Bestari Jaya, Selangor | 3.3183 58 | 101.32 7095 | 5,152. 22 | Certified | Not Applicable | 3-Mar-11 | 19-20 July 2021 |
| Tennamaram | Malaysia | Bukit Talang Estate | Bestari Jaya, Selangor | 3.4015 77 | 101.30 3102 | 3,572. 44 | Certified | Not Applicable | 3-Mar-11 | 19-20 July 2021 |
| Bkt Kerayong | Malaysia | Bukit Kerayong Oil Mill | Kapar, Selangor | 3.1880 46 | 101.37 2775 | 6,346. 90 | Certified | Not Applicable | 15-Apr-11 | 19-20 July 2021 |
| Bkt Kerayong | Malaysia | Bukit Kerayong Estate | Kapar, Selangor | 3.1652 46 | 101.37 1079 | 2,699. 28 | Certified | Not Applicable | 15-Apr-11 | 19-20 July 2021 |

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| Bkt Kerayong | Malaysia | Bukit Cheraka Estate | Kapar, Selangor | 3.223053 | 101.357632 | 3,647.62 | Certified | Not Applicable | 15-Apr-11 | 19-20 July 2021 |
| East | Malaysia | East Oil Mill | Carey Island, Selangor | 2.885355 | 101.436495 | 10,902.94 | Certified | Not Applicable | 19-May-10 | 19-20 July 2021 |
| East | Malaysia | East Estate | Carey Island, Selangor | 2.894306 | 101.402747 | 5,634.45 | Certified | Not Applicable | 19-May-10 | 19-20 July 2021 |
| East | Malaysia | Sepang Estate | Sepang, Selangor | 2.692067 | 101.723500 | 2,092.28 | Certified | Not Applicable | 19-May-10 | 19-20 July 2021 |
| East | Malaysia | Dusun Durian Estate | Kuala Selangor, Selangor | 2.810648 | 101.495017 | 3,176.21 | Certified | Not Applicable | 19-May-10 | 19-20 July 2021 |
| West | Malaysia | West Oil Mill | Carey Island, Selangor | 2.905704 | 101.360380 | 5,912.69 | Certified | Not Applicable | 19-May-10 | 19-20 July 2021 |
| West | Malaysia | West Estate | Carey Island, Selangor | 2.867693 | 101.338941 | 5,912.69 | Certified | Not Applicable | 19-May-10 | 19-20 July 2021 |
| Bukit Puteri | Malaysia | Bukit Puteri Oil Mill | Raub, Pahang | 4.201447 | 101.862680 | 3,875.80 | Certified | Not Applicable | 7-Jul-11 | 19-20 July 2021 |
| Bukit Puteri | Malaysia | Bukit Puteri Estate | Raub, Pahang | 4.188357 | 101.864388 | 3,875.80 | Certified | Not Applicable | 7-Jul-11 | 19-20 July 2021 |
| Kerdau | Malaysia | Kerdau Oil Mill | Temerloh, Pahang | 3.569692 | 102.278807 | 13,781.50 | Certified | Not Applicable | 7-Jul-11 | 19-20 July 2021 |

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| Kerdau | Malaysia | Kerdau Estate | Temerloh, Pahang | 3.5827 26 | 102.31 4266 | 5,683. 04 | Certified | Not Applicable | 7-Jul-11 | 19-20 July 2021 |
| Kerdau | Malaysia | Mentakab Estate | Temerloh, Pahang | 3.4882 12 | 102.24 3800 | 3,266. 49 | Certified | Not Applicable | 7-Jul-11 | 19-20 July 2021 |
| Kerdau | Malaysia | Chenor Estate | Temerloh, Pahang | 3.7843 43 | 102.61 5444 | 2,834. 98 | Certified | Not Applicable | 7-Jul-11 | 19-20 July 2021 |
| Kerdau | Malaysia | Sg Mai Estate | Temerloh, Pahang | 3.8477 49 | 102.34 1727 | 1,996. 99 | Certified | Not Applicable | 7-Jul-11 | 19-20 July 2021 |
| Jabor | Malaysia | Jabor Oil Mill | Kuantan, Pahang | 3.9600 00 | 103.31 0000 | 2,332. 92 | Certified | Not Applicable | 7-Jul-11 | 19-20 July 2021 |
| Jabor | Malaysia | Jabor Estate | Kuantan, Pahang | 3.9581 68 | 103.29 9484 | 2,332. 92 | Certified | Not Applicable | 7-Jul-11 | 19-20 July 2021 |
| Labu | Malaysia | Labu Oil Mill | Nilai, Negeri Sembilan | 2.7507 30 | 101.80 5038 | 4,529. 72 | Certified | Not Applicable | 30-Dec-11 | 19-20 July 2021 |
| Labu | Malaysia | Labu Estate | Nilai, Negeri Sembilan | 2.7373 80 | 101.81 6051 | 4,529. 72 | Certified | Not Applicable | 30-Dec-11 | 19-20 July 2021 |
| Tanah Merah | Malaysia | Tanah Merah Oil Mill | Port Dickson, Negeri Sembilan | 2.6543 68 | 101.79 2488 | 6,203. 87 | Certified | Not Applicable | 19-May-10 | 19-20 July 2021 |
| Tanah Merah | Malaysia | Tanah Merah Estate | Port Dickson, Negeri Sembilan | 2.6347 76 | 101.79 8120 | 4,341. 73 | Certified | Not Applicable | 19-May-10 | 19-20 July 2021 |

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| Tanah Merah | Malaysia | Bukit Pelandok Estate | Port Dickson, Negeri Sembilan | 2.690570 | 101.773393 | 1,862.14 | Certified | Not Applicable | 19-May-10 | 19-20 July 2021 |
| Sua Betong | Malaysia | Sua Betong Oil Mill | Port Dickson, Negeri Sembilan | 2.529158 | 101.894873 | 18,457.27 | Certified | Not Applicable | 18-Feb-14 | 19-20 July 2021 |
| Sua Betong | Malaysia | Sua Betong Estate | Port Dickson, Negeri Sembilan | 2.503423 | 101.919182 | 2,870.75 | Certified | Not Applicable | 18-Feb-14 | 19-20 July 2021 |
| Sua Betong | Malaysia | Sengkang Estate | Port Dickson, Negeri Sembilan | 2.447583 | 101.962703 | 2,831.51 | Certified | Not Applicable | 18-Feb-14 | 19-20 July 2021 |
| Sua Betong | Malaysia | Bradwall Estate | Port Dickson, Negeri Sembilan | 2.564010 | 101.938966 | 3,828.34 | Certified | Not Applicable | 18-Feb-14 | 19-20 July 2021 |
| Sua Betong | Malaysia | PD Lukut Estate | Port Dickson, Negeri Sembilan | 2.535525 | 101.850486 | 1,523.79 | Certified | Not Applicable | 18-Feb-14 | 19-20 July 2021 |
| Sua Betong | Malaysia | Tampin Linggi Estate | Port Dickson, Negeri Sembilan | 2.523442 | 101.995888 | 2,106.71 | Certified | Not Applicable | 18-Feb-14 | 19-20 July 2021 |
| Sua Betong | Malaysia | Sg. Bahru Estate | Port Dickson, Negeri Sembilan | 2.439865 | 102.084904 | 1,427.31 | Certified | Not Applicable | 18-Feb-14 | 19-20 July 2021 |
| Sua Betong | Malaysia | Salak Estate | Port Dickson, Negeri Sembilan | 2.572851 | 101.884647 | 3,868.86 | Certified | Not Applicable | 18-Feb-14 | 19-20 July 2021 |
| Kok Foh | Malaysia | Kok Foh Oil Mill | Bahau, Negeri Sembilan | 2.784092 | 102.507537 | 14,852.64 | Certified | Not Applicable | 7-Jul-11 | 19-20 July 2021 |

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| Kok Foh | Malaysia | Muar River Estate | Bahau, Negeri Sembilan | 2.592059 | 102.740421 | 1,584.62 | Certified | Not Applicable | 7-Jul-11 | 19-20 July 2021 |
| Kok Foh | Malaysia | Sg. Senarut Estate + Sg Gemas Estate | Bahau, Negeri Sembilan | 2.556845 | 102.691147 | 2,958.38 | Certified | Not Applicable | 7-Jul-11 | 19-20 July 2021 |
| Kok Foh | Malaysia | Kok Foh Estate | Bahau, Negeri Sembilan | 2.818025 | 102.516297 | 2,275.84 | Certified | Not Applicable | 7-Jul-11 | 19-20 July 2021 |
| Kok Foh | Malaysia | Bukit Pilah Estate | Bahau, Negeri Sembilan | 2.718295 | 102.527980 | 3,667.31 | Certified | Not Applicable | 7-Jul-11 | 19-20 July 2021 |
| Kok Foh | Malaysia | St. Helier Estate | Bahau, Negeri Sembilan | 2.779462 | 102.374345 | 1,992.65 | Certified | Not Applicable | 7-Jul-11 | 19-20 July 2021 |
| Kok Foh | Malaysia | Sungai Sabaling Estate | Bahau, Negeri Sembilan | 2.844046 | 102.474445 | 1,321.35 | Certified | Not Applicable | 7-Jul-11 | 19-20 July 2021 |
| Kok Foh | Malaysia | Pertang Estate | Bahau, Negeri Sembilan | 2.969102 | 102.244214 | 1,052.49 | Certified | Not Applicable | 7-Jul-11 | 19-20 July 2021 |
| Kempas | Malaysia | Kempas Oil Mill | Jasin, Melaka | 2.243408 | 102.481607 | 11,828.51 | Certified | Not Applicable | 20-May-10 | 19-20 July 2021 |
| Kempas | Malaysia | Kempas Estate | Jasin, Melaka | 2.207737 | 102.441483 | 4,505.45 | Certified | Not Applicable | 20-May-10 | 19-20 July 2021 |
| Kempas | Malaysia | Tangkah Estate | Jasin, Melaka | 2.292917 | 102.602549 | 2,537.78 | Certified | Not Applicable | 20-May-10 | 19-20 July 2021 |

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| Kempas | Malaysia | Kemuning Estate | Jasin, Melaka | 2.4310 24 | 102.29 7339 | 2,671. 05 | Certified | Not Applicable | 20- May-10 | 19-20 July 2021 |
| Kempas | Malaysia | Serkam Estate | Jasin, Melaka | 2.2505 57 | 102.39 4318 | 2,114. 23 | Certified | Not Applicable | 20- May-10 | 19-20 July 2021 |
| Diamond Jubilee | Malaysia | Diamond Jubilee Palm Oil Mill | Jasin, Melaka | 2.3242 47 | 102.48 2843 | 7,356. 19 | Certified | Not Applicable | 5-Oct- 11 | 19-20 July 2021 |
| Diamond Jubilee | Malaysia | Diamond Jubilee Estate | Jasin, Melaka | 2.3074 99 | 102.43 9884 | 2,836. 19 | Certified | Not Applicable | 5-Oct- 11 | 19-20 July 2021 |
| Diamond Jubilee | Malaysia | Bukit Asahan Estate | Jasin, Melaka | 2.4174 85 | 102.55 0615 | 3,072. 18 | Certified | Not Applicable | 5-Oct- 11 | 19-20 July 2021 |
| Diamond Jubilee | Malaysia | Welch Estate | Jasin, Melaka | 2.4593 03 | 102.65 6758 | 1,447. 82 | Certified | Not Applicable | 5-Oct- 11 | 19-20 July 2021 |
| Pagoh | Malaysia | Pagoh Oil Mill | Muar, Johor | 2.0777 08 | 102.71 9062 | 7,418. 59 | Certified | Not Applicable | 28- Jan-14 | 19-20 July 2021 |
| Pagoh | Malaysia | Pagoh Estate | Muar, Johor | 2.0786 52 | 102.70 0463 | 2,325. 93 | Certified | Not Applicable | 28- Jan-14 | 19-20 July 2021 |
| Pagoh | Malaysia | Lanadron Estate | Muar, Johor | 2.1997 15 | 102.74 4380 | 1,964. 44 | Certified | Not Applicable | 28- Jan-14 | 19-20 July 2021 |
| Pagoh | Malaysia | Pengkalan Bukit Estate | Muar, Johor | 2.1264 14 | 102.77 2148 | 3,128. 22 | Certified | Not Applicable | 28- Jan-14 | 19-20 July 2021 |

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| Chaah | Malaysia | Chaah Oil Mill | Chaah, Johor | 2.148569 | 102.973809 | 8,699.93 | Certified | Not Applicable | 18-Nov-10 | 19-20 July 2021 |
| Chaah | Malaysia | Chaah Estate | Chaah, Johor | 2.148681 | 102.975656 | 2,795.36 | Certified | Not Applicable | 18-Nov-10 | 19-20 July 2021 |
| Chaah | Malaysia | Sg. Simpang Kiri Estate | Chaah, Johor | 2.117737 | 102.990732 | 2,371.66 | Certified | Not Applicable | 18-Nov-10 | 19-20 July 2021 |
| Chaah | Malaysia | North Labis Estate | Chaah, Johor | 2.383325 | 103.024507 | 3,532.91 | Certified | Not Applicable | 18-Nov-10 | 19-20 July 2021 |
| Gunung Mas | Malaysia | Gunung Mas Oil Mill | Kluang, Johor | 2.243769 | 103.138027 | 12,305.54 | Certified | Not Applicable | 19-May-10 | 19-20 July 2021 |
| Gunung Mas | Malaysia | Gunung Mas Estate | Kluang, Johor | 2.256176 | 103.128691 | 3,466.17 | Certified | Not Applicable | 19-May-10 | 19-20 July 2021 |
| Gunung Mas | Malaysia | Kempas Klebang Estate | Kluang, Johor | 2.217905 | 103.160775 | 2,473.06 | Certified | Not Applicable | 19-May-10 | 19-20 July 2021 |
| Gunung Mas | Malaysia | Bukit Paloh Estate | Kluang, Johor | 2.155149 | 103.180279 | 3,390.90 | Certified | Not Applicable | 19-May-10 | 19-20 July 2021 |
| Gunung Mas | Malaysia | Yong Peng Estate | Kluang, Johor | 2.063715 | 103.119119 | 2,975.41 | Certified | Not Applicable | 19-May-10 | 19-20 July 2021 |
| Bukit Benut | Malaysia | Bukit Benut Oil Mill | Kluang, Johor | 1.931143 | 103.347365 | 8,495.13 | Certified | Not Applicable | 5-Oct-11 | 19-20 July 2021 |

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| Bukit Benut | Malaysia | Bukit Benut Estate | Kluang, Johor | 1.9102 17 | 103.33 6262 | 2,799. 78 | Certified | Not Applicable | 5-Oct-11 | 19-20 July 2021 |
| Bukit Benut | Malaysia | Lambak Elaeis Estate | Kluang, Johor | 1.9654 76 | 103.31 9840 | 3,740. 16 | Certified | Not Applicable | 5-Oct-11 | 19-20 July 2021 |
| Bukit Benut | Malaysia | CEP Nyior Estate | Kluang, Johor | 2.0906 38 | 103.24 8932 | 1,955. 19 | Certified | Not Applicable | 5-Oct-11 | 19-20 July 2021 |
| Ulu Remis | Malaysia | Ulu Remis Oil Mill | Layang-layang, Johor | 1.8344 33 | 103.46 2750 | 17,11 5.58 | Certified | Not Applicable | 11-Apr-11 | 19-20 July 2021 |
| Ulu Remis | Malaysia | Ulu Remis Estate | Layang-layang, Johor | 1.8423 29 | 103.47 9604 | 2,598. 25 | Certified | Not Applicable | 11-Apr-11 | 19-20 July 2021 |
| Ulu Remis | Malaysia | Cenas Estate | Layang-layang, Johor | 1.9261 43 | 103.58 0014 | 1,974. 06 | Certified | Not Applicable | 11-Apr-11 | 19-20 July 2021 |
| Ulu Remis | Malaysia | Bukit Badak Estate | Layang-layang, Johor | 1.8733 53 | 103.50 6986 | 3,234. 25 | Certified | Not Applicable | 11-Apr-11 | 19-20 July 2021 |
| Ulu Remis | Malaysia | Tun Dr. Ismail Estate | Layang-layang, Johor | 1.8327 10 | 103.35 9779 | 4,271. 44 | Certified | Not Applicable | 11-Apr-11 | 19-20 July 2021 |
| Ulu Remis | Malaysia | Pekan Estate | Layang-layang, Johor | 1.8466 03 | 103.58 3208 | 3,258. 70 | Certified | Not Applicable | 11-Apr-11 | 19-20 July 2021 |

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| Ulu Remis | Malaysia | Sembrong Estate | Layang-layang, Johor | 1.8786 96 | 103.45 9400 | 1,778. 88 | Certified | Not Applicable | 11- Apr-11 | 19-20 July 2021 |
| Hadapan | Malaysia | Hadapan Oil Mill | Layang-layang, Johor | 1.7623 10 | 103.44 8013 | 11,37 1.82 | Certified | Not Applicable | 29- Mar-11 | 19-20 July 2021 |
| Hadapan | Malaysia | Sri Pulau Estate | Layang-layang, Johor | 1.6176 21 | 103.49 3465 | 2,049. 87 | Certified | Not Applicable | 29- Mar-11 | 19-20 July 2021 |
| Hadapan | Malaysia | Kulai Estate | Layang-layang, Johor | 1.6610 84 | 103.57 0639 | 3,023. 42 | Certified | Not Applicable | 29- Mar-11 | 19-20 July 2021 |
| Hadapan | Malaysia | Layang Estate | Layang-layang, Johor | 1.7887 81 | 103.45 1095 | 3,258. 90 | Certified | Not Applicable | 29- Mar-11 | 19-20 July 2021 |
| Hadapan | Malaysia | CEP Renggam Estate | Layang-layang, Johor | 1.8748 83 | 103.37 7487 | 3,039. 63 | Certified | Not Applicable | 29- Mar-11 | 19-20 July 2021 |
| Sandakan Bay | Malaysia | Sandakan Bay Oil Mill | Sandakan, Sabah | 5.6408 34 | 118.16 6631 | 16,76 4.34 | Certified | Not Applicable | 1-Oct- 08 | 19-20 July 2021 |
| Sandakan Bay | Malaysia | Tun Tan Siew Sin Estate | Sandakan, Sabah | 5.6497 54 | 118.18 8772 | 3,125. 60 | Certified | Not Applicable | 1-Oct- 08 | 19-20 July 2021 |
| Sandakan Bay | Malaysia | Tunku Estate | Sandakan, Sabah | 5.6957 78 | 118.20 5194 | 3,199. 05 | Certified | Not Applicable | 1-Oct- 08 | 19-20 July 2021 |
| Sandakan Bay | Malaysia | Tigowis Estate | Sandakan, Sabah | 5.7453 96 | 118.21 6785 | 2,074. 02 | Certified | Not Applicable | 1-Oct- 08 | 19-20 July 2021 |

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| Sandakan Bay | Malaysia | Sentosa Estate | Sandakan, Sabah | 5.599561 | 118.178923 | 3,545.54 | Certified | Not Applicable | 1-Oct-08 | 19-20 July 2021 |
| Sandakan Bay | Malaysia | Segaliud Estate | Sandakan, Sabah | 5.707622 | 117.753884 | 4,820.13 | Certified | Not Applicable | 1-Oct-08 | 19-20 July 2021 |
| Melalap | Malaysia | Melalap Oil Mill | Tenom, Sabah | 5.233156 | 115.986648 | 5246.18 | Certified | Not Applicable | 21-Jan-11 | 19-20 July 2021 |
| Melalap | Malaysia | Melalap Estate | Tenom, Sabah | 5.223404 | 115.992040 | 2,096.73 | Certified | Not Applicable | 21-Jan-11 | 19-20 July 2021 |
| Melalap | Malaysia | Sapong Estate | Tenom, Sabah | 5.045466 | 115.930091 | 3,149.45 | Certified | Not Applicable | 21-Jan-11 | 19-20 July 2021 |
| Binuang | Malaysia | Binuang Oil Mill | Kunak, Sabah | 4.704700 | 118.060210 | 11,659.58 | Certified | Not Applicable | 16-Jan-09 | 19-20 July 2021 |
| Binuang | Malaysia | Binuang Estate | Kunak, Sabah | 4.687893 | 118.049997 | 3,271.08 | Certified | Not Applicable | 16-Jan-09 | 19-20 July 2021 |
| Binuang | Malaysia | Sungang Estate | Kunak, Sabah | 4.658950 | 118.121355 | 3,407.98 | Certified | Not Applicable | 16-Jan-09 | 19-20 July 2021 |
| Binuang | Malaysia | Tingayu Estate | Kunak, Sabah | 4.716962 | 118.077638 | 1,881.08 | Certified | Not Applicable | 16-Jan-09 | 19-20 July 2021 |
| Binuang | Malaysia | Jeleta Bumi Estate | Kunak, Sabah | 4.709414 | 117.977971 | 3,099.44 | Certified | Not Applicable | 16-Jan-09 | 19-20 July 2021 |

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| Giram | Malaysia | Giram Oil Mill | Kunak, Sabah | 4.586585 | 118.193448 | 8,345.02 | Certified | Not Applicable | 16-Jan-09 | 19-20 July 2021 |
| Giram | Malaysia | Giram Estate | Kunak, Sabah | 4.575846 | 118.206571 | 4,166.98 | Certified | Not Applicable | 16-Jan-09 | 19-20 July 2021 |
| Giram | Malaysia | Mostyn Estate | Kunak, Sabah | 4.670009 | 118.169029 | 4,178.04 | Certified | Not Applicable | 16-Jan-09 | 19-20 July 2021 |
| Merotai | Malaysia | Merotai Oil Mill | Tawau, Sabah | 4.373961 | 117.808354 | 11,545.71 | Certified | Not Applicable | 16-Jan-09 | 19-20 July 2021 |
| Merotai | Malaysia | Merotai Estate | Tawau, Sabah | 4.390278 | 117.808586 | 3,052.66 | Certified | Not Applicable | 16-Jan-09 | 19-20 July 2021 |
| Merotai | Malaysia | Imam Estate | Tawau, Sabah | 4.341017 | 117.894636 | 3,773.56 | Certified | Not Applicable | 16-Jan-09 | 19-20 July 2021 |
| Merotai | Malaysia | Tiger Estate | Tawau, Sabah | 4.409715 | 117.840613 | 2,497.86 | Certified | Not Applicable | 16-Jan-09 | 19-20 July 2021 |
| Merotai | Malaysia | Table Estate | Tawau, Sabah | 4.365974 | 117.868354 | 2,221.63 | Certified | Not Applicable | 16-Jan-09 | 19-20 July 2021 |
| Lavang | Malaysia | Lavang Oil Mill | Bintulu, Sarawak | 3.431669 | 113.598862 | 24,836.54 | Certified | Not Applicable | 30-Dec-11 | 19-20 July 2021 |
| Lavang | Malaysia | Lavang Estate | Bintulu, Sarawak | 3.427129 | 113.586935 | 4,363.83 | Certified | Not Applicable | 30-Dec-11 | 19-20 July 2021 |

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| Lavang | Malaysia | Rasan Estate | Bintulu, Sarawak | 3.4050 57 | 113.63 5653 | 3,454. 00 | Certified | Not Applicable | 30- Dec-11 | 19-20 July 2021 |
| Lavang | Malaysia | Belian Estate | Bintulu, Sarawak | 3.3691 11 | 113.56 0310 | 2,847. 00 | Certified | Not Applicable | 30- Dec-11 | 19-20 July 2021 |
| Lavang | Malaysia | Kelida Estate | Bintulu, Sarawak | 3.3648 92 | 113.62 4465 | 2,460. 00 | Certified | Not Applicable | 30- Dec-11 | 19-20 July 2021 |
| Lavang | Malaysia | Lavang (Special) Estate | Bintulu, Sarawak | 3.4006 34 | 113.59 3633 | included under Lavan g Estate Ha | Certified | Not Applicable | 30- Dec-11 | 19-20 July 2021 |
| Lavang | Malaysia | Pekaka Estate | Bintulu, Sarawak | 3.4810 90 | 113.64 1821 | 2,626. 14 | Certified | Not Applicable | 30- Dec-11 | 19-20 July 2021 |
| Lavang | Malaysia | Ruai Estate | Bintulu, Sarawak | 3.4491 98 | 113.62 4477 | 2,460. 96 | Certified | Not Applicable | 30- Dec-11 | 19-20 July 2021 |
| Lavang | Malaysia | Dulang Estate | Bintulu, Sarawak | 3.4601 95 | 113.67 7984 | 2,548. 00 | Certified | Not Applicable | 30- Dec-11 | 19-20 July 2021 |
| Lavang | Malaysia | Charquest Estate | Bintulu, Sarawak | 3.4906 18 | 113.60 2270 | 1,448. 71 | Certified | Not Applicable | 30- Dec-11 | 19-20 July 2021 |
| Lavang | Malaysia | Paroh Estate | Bintulu, Sarawak | 3.4639 13 | 113.73 4106 | 2,627. 90 | Certified | Not Applicable | 30- Dec-11 | 19-20 July 2021 |

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| Rajawali | Malaysia | Rajawali Oil Mill | Bintulu, Sarawak | 3.373177 | 113.400308 | 14,104.45 | Certified | Not Applicable | 30-Dec-11 | 19-20 July 2021 |
| Rajawali | Malaysia | Rajawali Estate | Bintulu, Sarawak | 3.394716 | 113.426263 | 6,087.27 | Certified | Not Applicable | 30-Dec-11 | 19-20 July 2021 |
| Rajawali | Malaysia | Samudera Estate | Bintulu, Sarawak | 3.502793 | 113.412122 | 3,308.60 | Certified | Not Applicable | 30-Dec-11 | 19-20 July 2021 |
| Rajawali | Malaysia | Semarak Estate | Bintulu, Sarawak | 3.373453 | 113.375595 | 2,248.68 | Certified | Not Applicable | 30-Dec-11 | 19-20 July 2021 |
| Rajawali | Malaysia | Bayu Estate | Bintulu, Sarawak | 3.503470 | 113.374145 | 2,459.90 | Certified | Not Applicable | 30-Dec-11 | 19-20 July 2021 |
| Derawan | Malaysia | Derawan Oil Mill | Bintulu, Sarawak | 3.390463 | 113.348888 | 9,528.83 | Certified | Not Applicable | 30-Dec-11 | 19-20 July 2021 |
| Derawan | Malaysia | Derawan Estate | Bintulu, Sarawak | 3.412304 | 113.359221 | 2,490.79 | Certified | Not Applicable | 30-Dec-11 | 19-20 July 2021 |
| Derawan | Malaysia | Sahua Estate | Bintulu, Sarawak | 3.462224 | 113.366926 | 2,644.00 | Certified | Not Applicable | 30-Dec-11 | 19-20 July 2021 |
| Derawan | Malaysia | Takau Estate | Bintulu, Sarawak | 3.387069 | 113.329626 | 2,107.00 | Certified | Not Applicable | 30-Dec-11 | 19-20 July 2021 |
| Derawan | Malaysia | Damai Estate | Bintulu, Sarawak | 3.440639 | 113.400749 | 2,287.04 | Certified | Not Applicable | 30-Dec-11 | 19-20 July 2021 |

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| Guadalcanal Plains Palm Oil Limited (GPPOL) | | Tetere Oil Mill | Guadalcanal Province, Solomon Islands | 9.442703 | 160.219366 | 9025.69 | Certified | Not Applicable | 18-Mar-11 | 19-20 July 2021 |
| Guadalcanal Plains Palm Oil Limited (GPPOL) | | Tetere Estate | Guadalcanal Province, Solomon Islands | 9.449012 | 160.218796 | 2947.79 | Certified | Not Applicable | 18-Mar-11 | 19-20 July 2021 |
| Guadalcanal Plains Palm Oil Limited (GPPOL) | | Ngalimbiu Estate | Guadalcanal Province, Solomon Islands | 9.463400 | 160.146900 | 2498.65 | Certified | Not Applicable | 18-Mar-11 | 19-20 July 2021 |
| Guadalcanal Plains Palm Oil Limited (GPPOL) | Solomon Islands | Mbalisuna Estate | Guadalcanal Province, Solomon Islands | 9.447400 | 160.255700 | 2868.47 | Certified | Not Applicable | 18-Mar-11 | 19-20 July 2021 |
| Guadalcanal Plains Palm Oil Limited (GPPOL) | Solomon Islands | Smallholders – West Zone (83) | Guadalcanal Province, Solomon Islands | 9.450278 | 160.140000 | 245.50 | Certified | Not Applicable | 18-Mar-11 | 19-20 July 2021 |
| Guadalcanal Plains Palm Oil Limited (GPPOL) | Solomon Islands | Smallholders – Central Zone (53) | Guadalcanal Province, Solomon Islands | 9.460000 | 160.210000 | 181.71 | Certified | Not Applicable | 18-Mar-11 | 19-20 July 2021 |
| Guadalcanal Plains Palm Oil Limited (GPPOL) | Solomon Islands | Smallholders – MBA East Zone (59) | Guadalcanal Province, Solomon Islands | 9.468056 | 160.253889 | 180.80 | Certified | Not Applicable | 18-Mar-11 | 19-20 July 2021 |
| Guadalcanal Plains Palm Oil Limited (GPPOL) | Solomon Islands | Smallholders – MBE East Zone (37) | Guadalcanal Province, Solomon Islands | 9.484167 | 160.322222 | 102.77 | Certified | Not Applicable | 18-Mar-11 | 19-20 July 2021 |
| Milne Bay Estates (MBE) | Papua New Guinea | Hagita Oil Mill | Milne Bay Province, Papua New Guinea | -10.315733 | 150.286233 | 16508.59 | Certified | Not Applicable | 15-Feb-13 | 19-20 July 2021 |
| Milne Bay Estates (MBE) | Papua New Guinea | Giligili Estate | Milne Bay Province, Papua New Guinea | -10.300139 | 150.358361 | 1095.47 | Certified | Not Applicable | 15-Feb-13 | 19-20 July 2021 |

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| Milne Bay Estates (MBE) | Papua New Guinea | Hagita Estate | Milne Bay Province, Papua New Guinea | - 10.310 944 | 150.28 1028 | 2450. 02 | Certified | Not Applicable | 15- Feb-13 | 19-20 July 2021 |
| Milne Bay Estates (MBE) | Papua New Guinea | Waigani Estate | Milne Bay Province, Papua New Guinea | - 10.309 389 | 150.25 9639 | 2341. 13 | Certified | Not Applicable | 15- Feb-13 | 19-20 July 2021 |
| Milne Bay Estates (MBE) | Papua New Guinea | Sagarai Estate | Milne Bay Province, Papua New Guinea | - 10.432 861 | 150.19 0917 | 2864. 55 | Certified | Not Applicable | 15- Feb-13 | 19-20 July 2021 |
| Milne Bay Estates (MBE) | Papua New Guinea | Padipadi Estate | Milne Bay Province, Papua New Guinea | - 10.405 083 | 150.02 4361 | 4517. 67 | Certified | Not Applicable | 15- Feb-13 | 19-20 July 2021 |
| Milne Bay Estates (MBE) | Papua New Guinea | Mariawatte Estate | Milne Bay Province, Papua New Guinea | - 10.405 083 | 149.89 2333 | 1680. 14 | Certified | Not Applicable | 15- Feb-13 | 19-20 July 2021 |
| Milne Bay Estates (MBE) | Papua New Guinea | Smallholders - East Gurney Estate (259) | Milne Bay Province, Papua New Guinea | From - 10.327 639 to - 10.290 528 | From 150.28 4944 to 150.38 9556 | 450.5 9 | Certified | Not Applicable | 15- Feb-13 | 19-20 July 2021 |
| Milne Bay Estates (MBE) | Papua New Guinea | Smallholders - West Gurney Estate (231) | Milne Bay Province, Papua New Guinea | From - 10.307 500 to - 10.408 056 | From 150.28 4944 to 150.66 4944 | 479.1 3 | Certified | Not Applicable | 15- Feb-13 | 19-20 July 2021 |
| Milne Bay Estates (MBE) | Papua New Guinea | Smallholders - East Sagarai Estate (156) | Milne Bay Province, Papua New Guinea | From - 10.431 250 to - - | From 150.26 9222 to - | 283.9 3 | Certified | Not Applicable | 15- Feb-13 | 19-20 July 2021 |

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| | | | | 10.290 528 | 150.30 0222 | | | | | |
| Milne Bay Estates (MBE) | Papua New Guinea | Smallholders - West Sagarai Estate (212) | Milne Bay Province, Papua New Guinea | From - 10.450 833 to - 10.405 806 | From 150.04 7889 to 150.04 7889 | 345.96 | Certified | Not Applicable | 15-Feb-13 | 19-20 July 2021 |
| Poliamba (POL) | Papua New Guinea | Poliamba Oil Mill | New Ireland Province, Papua New Guinea | - 2.8747 22222 | 151.27 63889 | 10720.53 | Certified | Not Applicable | 19-Mar-12 | 19-20 July 2021 |
| Poliamba (POL) | Papua New Guinea | Kara Estate | New Ireland Province, Papua New Guinea | From - 2.7063 88 to -2.811 | From 151.02 833 to 151.18 49722 | 1032.10 | Certified | Not Applicable | 19-Mar-12 | 19-20 July 2021 |
| Poliamba (POL) | Papua New Guinea | Nalik Estate | New Ireland Province, Papua New Guinea | From - 2.8705 5 to - 2.9324 99 | From 151.21 499 to 151.42 9722 | 2666.75 | Certified | Not Applicable | 19-Mar-12 | 19-20 July 2021 |
| Poliamba (POL) | Papua New Guinea | West Coast Estate | New Ireland Province, Papua New Guinea | From - 2.8137 2 to - 2.9822 | From 151.21 499 to 151.29 2972 | 627.60 | Certified | Not Applicable | 19-Mar-12 | 19-20 July 2021 |
| Poliamba (POL) | Papua New Guinea | Noatsi Estate | New Ireland Province, Papua New Guinea | From - 2.9605 5 to | From 151.45 6388 | 2064.10 | Certified | Not Applicable | 19-Mar-12 | 19-20 July 2021 |

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| | | | | - 3.1097 22 | to 151.70 5277 | | | | | |
| Poliamba (POL) | Papua New Guinea | Madak Estate | New Ireland Province, Papua New Guinea | From - 3.1430 55 to - 3.2597 22 | From 151.75 583 to 152.04 11 | 1517. 11 | Certified | Not Applicable | 19- Mar-12 | 19-20 July 2021 |
| Poliamba (POL) | Papua New Guinea | Smallholders -North Division (615) | New Ireland Province, Papua New Guinea | From - 2.6838 8 to -2.88 | From 150.95 to 150.25 66 | 1022. 12 | Certified | Not Applicable | 19- Mar-12 | 19-20 July 2021 |
| Poliamba (POL) | Papua New Guinea | Smallholders- South Division (866) | New Ireland Province, Papua New Guinea | From - 2.8711 to - 3.1880 55 | From 151.28 611 to 151.83 55 | 1257. 21 | Certified | Not Applicable | 19- Mar-12 | 19-20 July 2021 |
| Poliamba (POL) | Papua New Guinea | Smallholders -West Division (309) | New Ireland Province, Papua New Guinea | from - 2.8094 4 to - 2.9927 7 | From 151.02 833 to 151.34 5277 | 533.5 4 | Certified | Not Applicable | 19- Mar-12 | 19-20 July 2021 |
| Ramu Agricultural Industries Ltd (RAIL) | Papua New Guinea | Gusap Mill | Morobe Province, Papua New Guinea | - 6.0889 89 | 145.00 6104 | 14606 .08 | Certified | Not Applicable | 5-Aug- 10 | 19-20 July 2021 |

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|---|------------------|----------------------------------|------------------------------------|------------|----------|---------|-----------|----------------|----------|-----------------|
| Ramu Agricultural Industries Ltd (RAIL) | Papua New Guinea | Gusap East (Gusap) Estate | Morobe Province, Papua New Guinea | - 6.088556 | 146.006 | 2856.45 | Certified | Not Applicable | 5-Aug-10 | 19-20 July 2021 |
| Ramu Agricultural Industries Ltd (RAIL) | Papua New Guinea | Gusap West (Paddock) Estate | Morobe Province, Papua New Guinea | - 6.0494 | 145.9939 | 3019.09 | Certified | Not Applicable | 5-Aug-10 | 19-20 July 2021 |
| Ramu Agricultural Industries Ltd (RAIL) | Papua New Guinea | Surinam Estate | Morobe Province, Papua New Guinea | - 5.9003 | 145.7836 | 2154.14 | Certified | Not Applicable | 5-Aug-10 | 19-20 July 2021 |
| Ramu Agricultural Industries Ltd (RAIL) | Papua New Guinea | Dumpu Estate | Morobe Province, Papua New Guinea | - 5.8557 | 145.7304 | 2254.36 | Certified | Not Applicable | 5-Aug-10 | 19-20 July 2021 |
| Ramu Agricultural Industries Ltd (RAIL) | Papua New Guinea | Ngaru Estate | Morobe Province, Papua New Guinea | - 6.1393 | 146.6231 | 854.33 | Certified | Not Applicable | 5-Aug-10 | 19-20 July 2021 |
| Ramu Agricultural Industries Ltd (RAIL) | Papua New Guinea | J Estate (Jephcott) Estate | Morobe Province, Papua New Guinea | - 6.0562 | 145.933 | 2824.01 | Certified | Not Applicable | 5-Aug-10 | 19-20 July 2021 |
| Ramu Agricultural Industries Ltd (RAIL) | Papua New Guinea | Smallholders - Madang VOPs (71) | Morobe Province, Papua New Guinea | - 5.4625 | 145.3446 | 360.00 | Certified | Not Applicable | 5-Aug-10 | 19-20 July 2021 |
| Ramu Agricultural Industries Ltd (RAIL) | Papua New Guinea | Smallholders - Morobe VOPs (253) | Morobe Province, Papua New Guinea | - 6.7620 | 146.1304 | 283.70 | Certified | Not Applicable | 5-Aug-10 | 19-20 July 2021 |
| Higaturu Oil Palm (HOP) | Papua New Guinea | Sangara Oil Mill | Oro Bay Province, Papua New Guinea | - 8.7434 | 148.1987 | | Certified | Not Applicable | 1-Feb-13 | 19-20 July 2021 |
| Higaturu Oil Palm (HOP) | Papua New Guinea | Mamba Oil Mill | Oro Bay Province, Papua New Guinea | - 8.8547 | 147.7070 | | Certified | Not Applicable | 1-Feb-13 | 19-20 July 2021 |

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| Higaturu Oil Palm (HOP) | Papua New Guinea | Embi Estate | Oro Bay Province, Papua New Guinea | - 8.8506 | 148.42 92 | 1737. 78 | Certified | Not Applicable | 1-Feb-13 | 19-20 July 2021 |
| Higaturu Oil Palm (HOP) | Papua New Guinea | Ambogo Estate | Oro Bay Province, Papua New Guinea | - 8.7125 | 148.23 36 | 2040. 00 | Certified | Not Applicable | 1-Feb-13 | 19-20 July 2021 |
| Higaturu Oil Palm (HOP) | Papua New Guinea | Sangara Estate | Oro Bay Province, Papua New Guinea | - 8.7428 | 148.18 17 | 1780. 00 | Certified | Not Applicable | 1-Feb-13 | 19-20 July 2021 |
| Higaturu Oil Palm (HOP) | Papua New Guinea | Sumbiripa Estate | Oro Bay Province, Papua New Guinea | - 8.7517 | 148.96 31 | 2545. 00 | Certified | Not Applicable | 1-Feb-13 | 19-20 July 2021 |
| Higaturu Oil Palm (HOP) | Papua New Guinea | Mamba Estate | Oro Bay Province, Papua New Guinea | - 8.8481 | 147.71 50 | 4013. 10 | Certified | Not Applicable | 1-Feb-13 | 19-20 July 2021 |
| Higaturu Oil Palm (HOP) | Papua New Guinea | Sambogo Estate | Oro Bay Province, Papua New Guinea | - 8.7997 | 148.34 00 | 2637. 85 | Certified | Not Applicable | 1-Feb-13 | 19-20 July 2021 |
| Higaturu Oil Palm (HOP) | Papua New Guinea | Scheme Smallholder Sorovi Division(2019) | Oro Bay Province, Papua New Guinea | - 8.7586 | 148.31 28 | 3940. 21 | Certified | Not Applicable | 1-Feb-13 | 19-20 July 2021 |
| Higaturu Oil Palm (HOP) | Papua New Guinea | Scheme Smallholder Saiho Division(842) | Oro Bay Province, Papua New Guinea | - 8.8475 | 148.05 08 | 1493. 06 | Certified | Not Applicable | 1-Feb-13 | 19-20 July 2021 |
| Higaturu Oil Palm (HOP) | Papua New Guinea | Scheme Smallholder Aeka Division (911) | Oro Bay Province, Papua New Guinea | - 8.6739 | 148.01 78 | 1474. 23 | Certified | Not Applicable | 1-Feb-13 | 19-20 July 2021 |
| Higaturu Oil Palm (HOP) | Papua New Guinea | Scheme Smallholder Igora Division (1367) | Oro Bay Province, Papua New Guinea | - 8.7175 | 148.13 50 | 2940. 15 | Certified | Not Applicable | 1-Feb-13 | 19-20 July 2021 |

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| Higaturu Oil Palm (HOP) | Papua New Guinea | Scheme Smallholder Ilimo Division (671) | Oro Bay Province, Papua New Guinea | - 8.8936 | 147.85 78 | 1063. 66 | Certified | Not Applicable | 1-Feb-13 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Mosa Oil Mill | Kimbe, West New Britain, Papua New Guinea | 5.6224 81 | 150.24 5278 | | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Kumbango Oil Mill | Kimbe, West New Britain, Papua New Guinea | 5.5919 44 | 150.21 1944 | | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Kapiura Mill | Kimbe, West New Britain, Papua New Guinea | 5.6236 11 | 150.68 4167 | | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Numundo Mill | Kimbe, West New Britain, Papua New Guinea | 5.2333 33 | 150.03 3611 | | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Waraston Mill | Kimbe, West New Britain, Papua New Guinea | 5.4838 89 | 150.08 6667 | | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Bebere Estate | Kimbe, West New Britain, Papua New Guinea | 5.6140 81 | 150.25 1000 | 2226. 71 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Kumbango Estate | Kimbe, West New Britain, Papua New Guinea | 5.6053 00 | 150.19 6950 | 2610. 80 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Togulo Estate | Kimbe, West New Britain, Papua New Guinea | 5.6673 69 | 150.18 6389 | 1509. 20 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Dami Estate | Kimbe, West New Britain, Papua New Guinea | 5.5141 81 | 150.45 2058 | 1507. 00 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |

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| West New Britain (WNB) | Papua New Guinea | Waisisi Estate | Kimbe, West New Britain, Papua New Guinea | 5.512966 | 150.454435 | 1090.00 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Kautu Estate | Kimbe, West New Britain, Papua New Guinea | 5.521269 | 150.055125 | 4280.60 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Karausu Estate | Kimbe, West New Britain, Papua New Guinea | 5.520800 | 150.752600 | 2387.64 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Moroo Estate | Kimbe, West New Britain, Papua New Guinea | 5.520962 | 150.752590 | 848.16 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Bilomi Estate | Kimbe, West New Britain, Papua New Guinea | 5.617497 | 150.677997 | 2011.70 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Loata Estate | Kimbe, West New Britain, Papua New Guinea | 5.653739 | 150.666787 | 562.00 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Haella Estate | Kimbe, West New Britain, Papua New Guinea | 5.521269 | 150.048760 | 4220.30 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Garu Estate | Kimbe, West New Britain, Papua New Guinea | 5.512894 | 149.992978 | 3709.60 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Daliavu Estate | Kimbe, West New Britain, Papua New Guinea | 5.569761 | 150.022617 | 2484.10 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Sapuri Estate | Kimbe, West New Britain, Papua New Guinea | 5.569761 | 149.992978 | 2180.90 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |

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| West New Britain (WNB) | Papua New Guinea | Malilimi Estate | Kimbe, West New Britain, Papua New Guinea | 5.657400 | 150.441497 | 3837.00 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Rigula Estate | Kimbe, West New Britain, Papua New Guinea | 5.619300 | 150.792100 | 3720.00 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Nomundo Estate | Kimbe, West New Britain, Papua New Guinea | 5.499700 | 150.086600 | 2645.17 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Navarai / Karato ME /KDC EU Estate | Kimbe, West New Britain, Papua New Guinea | 5.359989 | 150.035939 | 1103.77 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Volupai / Lotomgam / Natupi / Goruru Estate | Kimbe, West New Britain, Papua New Guinea | 5.264997 | 150.009500 | 1992.59 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Lolokoru Estate | Kimbe, West New Britain, Papua New Guinea | 5.114500 | 150.058797 | 2453.10 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Ove Estate | Kimbe, West New Britain, Papua New Guinea | 5.580100 | 149.694400 | 3541.00 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Tamare Estate | Kimbe, West New Britain, Papua New Guinea | 5.625800 | 149.735300 | 1362.70 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Smallholders LSS Mosa (1822) | Kimbe, West New Britain, Papua New Guinea | 5.594119 | 150.226439 | 5008.53 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Smallholders VOP East (1817) | Kimbe, West New Britain, Papua New Guinea | 5.469011 | 150.452478 | 5324.37 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |

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| West New Britain (WNB) | Papua New Guinea | Smallholders VOP Central (1964) | Kimbe, West New Britain, Papua New Guinea | 5.593700 | 150.310900 | 5756.57 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Smallholders VOP West (1279) | Kimbe, West New Britain, Papua New Guinea | 5.280369 | 150.006219 | 2804.10 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Smallholders LSS Kapiura (551) | Kimbe, West New Britain, Papua New Guinea | 5.556645 | 150.850221 | 551.00 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Smallholders VOP Kapiura (850) | Kimbe, West New Britain, Papua New Guinea | 5.548892 | 150.868508 | 847.00 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| West New Britain (WNB) | Papua New Guinea | Smallholders Kaulong/Akami/Pushiki/Repamira/Sakapei (20) | Kimbe, West New Britain, Papua New Guinea | 5.650939 | 150.022897 | 700.37 | Certified | Not Applicable | 10-Sep-08 | 19-20 July 2021 |
| Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd. | Papua New Guinea | Erap Mill | Markham Farms | -6.580870 | 146.642220 | 5399.40 | Certified | Not Applicable | 27-Mar-20 | 19-20 July 2021 |
| Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd. | Papua New Guinea | Munum Estate | Markham Farms | -6.542150 | 146.816230 | 1734.57 | Certified | Not Applicable | 27-Mar-20 | 19-20 July 2021 |
| Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd. | Papua New Guinea | Maralumi Estate | Markham Farms | -6.542150 | 146.674450 | 2427.15 | Certified | Not Applicable | 27-Mar-20 | 19-20 July 2021 |
| Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd. | Papua New Guinea | Erap Estate | Markham Farms | -6.573910 | 146.648240 | 1237.68 | Certified | Not Applicable | 27-Mar-20 | 19-20 July 2021 |

3.3 Details of Nonconformities

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

During this Assessment there were *Three (3) Critical; One (1) Minor* nonconformities and no Opportunity For Improvement raised. The *SOU 24 Hadapan Pom and Supply base* Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

| Non-conformity | | | |
|--|--|---------------------|------------|
| NCR Ref # | 2287730-202212-M1 | Issued Date | 16/12/2022 |
| Due Date | 20/03/2023 | Closure Date | 24/02/2023 |
| Indicator & Category (Critical / Minor) | 3.8.12 (iv) (a) (Critical) | | |
| Statement of Nonconformity: | Delivery records of RSPO certified CPO and PK were not balanced within three-month basis. | | |
| Requirement Reference: | For mass balance module, the mill: 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. | | |
| Objective Evidence: | Based on RSPO Mass Balancing Record for Oil Mills (Hadapan Mill); Negative stock recorded after CSPK delivery in February 2022. Total closing stock for RSPO MB recorded at -35.40 mt. Stock was not balanced within 3 months and total of - 525.56 mt accumulated for April 2022 closing stock. Negative stock accumulated until end November 2022 with total of - 1240.34 mt. | | |
| Corrections: | <ol style="list-style-type: none"> GSC management already informed GTM through email to stop immediately the sales of RSPO CSPK to balance the Mass Balance sale to positive stock during period under review. To increase certified FFB supply and volume of certified PK to balance the negative stock with indicate over dispatch. To revise the ne MB sheet as provided by GSC team which shown the latest formula for volume of 'Balance' and 'Carry Forward'. | | |
| Root Cause Analysis: | <ol style="list-style-type: none"> Over-despatch of sales of RSPO CSPK because of breakdown communication with GTM. The calculation for PK/CSPK volume for 'Balance' and 'Carry Forward' for CPO and PK are not correct. Monitoring & Tracking on SCCS mass balance sheet for RSPO not effective. Insufficient training for PIC for documenting Mass Balance Sheet. | | |
| Corrective Actions: | <ol style="list-style-type: none"> PIC to have the SCCS training by GSC on Annual basis. To key in MB Sheet and monitoring on monthly basis by SCCS Person in charge. PIC will inform mill management and GCS team if any over dispatch for further action. | | |

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|-------------------------------|--|
| | 3. To communication with GTM on monthly basis for clarification on MB product sales on Palm Trace. |
| Assessment Conclusion: | As per verification on data and production report, the data in mass balance sheet was accurate. From the new mass balance sheet the monitoring record showed that the over sold RSPO CSPK was reduce from 1240.34 mt into -973.80 mt. The management already starting sold the CSPK as uncertified product and stop selling CSPK as RSPO certified since after audit. Therefore, the Major NC was close on 24/02/2023. |

| Non-conformity | | | |
|--|--|---------------------|------------|
| NCR Ref # | 2287730-202212-M2 | Issued Date | 16/12/2022 |
| Due Date | 20/03/2023 | Closure Date | 24/02/2023 |
| Indicator & Category (Critical / Minor) | 3.3.2 (Critical) consequence from the upgrade minor raised in previous audit to major non-compliance | | |
| Statement of Nonconformity: | The implementation of procedures for Personal protective Equipment (SD/SDP/PSQM(ESH)/201-OS16) and OSH Risk Management Procedure (Doc Number: UM/HSE/SP/01) was not consistently monitored. | | |
| Requirement Reference: | A mechanism to check consistent implementation of procedures is in place. | | |
| Objective Evidence: | <p>As per Personal protective Equipment (SD/SDP/PSQM(ESH)/201-OS16) dated January 2015 stated:-</p> <p>6.1.1.10 Employers should ensure that the employees who are required to wear PPE are fully informed of the requirements and of the reasons for them, and are given adequate training in the selection, wearing, maintenance and storage of this equipment. Found that the reception station attendant in Hadapan POM was wearing rubber boots. This was not in line with the SOU 24 Hadapan POM HIRARC for Reception Station that states Existing Control: Safety Shoes.</p> <p>There also found mechanism to monitor faulty machineries were not effectively implemented. It was noticed that the Shovel reverse siren was not functioning. Interview with the driver indicated that the siren has not been functioning for the last 2 months. Nevertheless, the shovel driver has not reported the issue to the current management. This was against the UM HSE Management System – OSH Risk Management Procedure (Doc Number: UM/HSE/SP/01) which states "To identify all the hazards in the workplace."</p> <p>Verified that the daily checklist prior to operation did not capture faulty parts as well.</p> | | |
| Corrections: | <ol style="list-style-type: none"> 1. Mill immediately informed worker on safety of wearing PPE to the worker. 2. Mill management immediate to repaired reverse siren for shovel. | | |
| Root Cause Analysis: | <ol style="list-style-type: none"> 1. Lapse on safety inspection of their workstation due to rainy day by workers. As rubber boot only for cleaning activity during non-processing day. 2. Miscommunication between the shovel driver and OU management due to PIC was transferred to the other mills and major changes in management. | | |
| Corrective Actions: | <ol style="list-style-type: none"> 1. Mill management to conducted safety and PPE awareness training for the worker. | | |

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| | 2. Mill Management to conduct safety training to shovel operator/driver. Shovel operator will inspect the shovel daily by using shovel inspection checklist before submitting the checklist to Mill management. The shovel inspection checklist includes all the main part of the shovel. |
| Assessment Conclusion: | From the document review on Investigation on issue record, Inspection list for shovel dated 31/1/2023 and 21/12/2022, record training on PPE and awareness of the shovel function dated 19/12/2022 and also training evaluation record. From the video call, the shovel already been fix and have a siren when its reverse. Interview by call with operator found that the operator was already fully understand pertaining to safety during driving the shovel. For the PPE workers issue, form the MS team interview found that they already understand and wearing the proper PPE during sorting the FFB. Hence, the major NC is effectively closed on 24/02/2023 with sufficient evidence of implementation. Continuous implementation will be further verified in the next assessment. |

| Non-conformity | | | |
|--|---|---------------------|------------|
| NCR Ref # | 2287730-202212-M3 | Issued Date | 16/12/2022 |
| Due Date | 20/03/2023 | Closure Date | 24/02/2023 |
| Indicator & Category (Critical / Minor) | 7.2.11 (Critical) | | |
| Statement of Nonconformity: | The implementation of procedures was not consistently monitored. | | |
| Requirement Reference: | (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. - Critical (Major) compliance - | | |
| Objective Evidence: | During the visit to the Chemical Store, it was noticed that the storekeeper was a female who was currently pregnant. The management have mentioned that they are aware that the storekeeper is pregnant. Nevertheless, the pregnant storekeeper is still currently working as the chemical storekeeper and has not been offered alternative work as verified during the audit. Furthermore, there were excessive fumes coming out of the chemical store due to poor ventilation. This was against the company policy that states "Sprayer atau pekerja Wanita yang bekerja secara langsung dengan bahan kimia yang disahkan hamil akan ditugaskan ke bahagian lain sepanjang kehamilan" and memo dated 01/11/2022 entitled "Larangan Terlibat Dalam Urusan Berkaitan dengan Chemical" | | |
| Corrections: | Estate management to follow memo that has been issued to storekeeper date 1st November 2022. Storekeeper immediately prohibited to involve with any chemical related job. The new appointed person in charge will cover all the operations in receiving, issuing of chemical. | | |
| Root Cause Analysis: | Person In charge (Storekeeper) not properly understand on "danger exposes to chemical during pregnancy". As during the audit, she assists the auditor to open the chemical store door during site visits due to her sense of ownership and accountability for his scope of work. | | |

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| Corrective Actions: | <p>Estate management to conduct refresher training to the storekeeper and all the female employee for improving their understanding of "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>Estate management to monitor by using "No work with chemical for new mother and pregnant lady" template every 2 month.</p> |
| Assessment Conclusion: | <p>As per interview with Pn Noryana and Ms Prisya, they understand and aware that no work with chemical for new mother and pregnant lady. The management already conducted the training on 27/12/2022 attended 13 person, the evaluation record also available dated 27/12/2022 was verified. From the evidence record review the major NC is effectively closed on 24/02/2023 with sufficient evidence of implementation. Continuous implementation will be further verified in the next assessment.</p> |

| Non-conformity | | | |
|--|---|---------------------|------------|
| NCR Ref # | 2287730-202212-N1 | Issued Date | 16/12/2022 |
| Due Date | Next Surveillance audit | Closure Date | Open |
| Indicator & Category (Critical / Minor) | 7.12.7 (Minor) | | |
| Statement of Nonconformity: | Outcomes of the monitoring are not effectively fed back into the management plan. | | |
| Requirement Reference: | 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. | | |
| Objective Evidence: | Based on site visit at Hadapan Division, P04A (water catchment - HCV 4); Visual observation at stagnant water near to HCV 4 area, unknown brownish colored liquid was seen overflowed to the catchment area. Latest HCV monitoring record on 8/12/22 has shown that no evidence of pollution (Can you spot any rubbish or oil or other pollution? and rated as no). No further investigation was made to ensure that brownish colored liquid comply with surface water quality under NQWS Class IIA/B and not updated in the management plan. | | |
| Corrections: | Estate Management had discussed with the Mill Management team to carry out water sampling from the highlighted area to ensure there is not water pollution issue. | | |
| Root Cause Analysis: | Estate Management team has carried out complete side inspection surrounding the HCV 4 area to identify any caused as lead to the brownish of colored at the stagnant water, However, there is no sign of leakages and unwanted issues found at the area. | | |
| Corrective Actions: | PIC to update HCV management plan and to continue the periodic inspections at the water catchment are (HCV 4). | | |
| Assessment Conclusion: | Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment. | | |

| Opportunity for Improvements | |
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| OFI # | Description |
| OFI 1 | Nil |

| Positive Findings | |
|-------------------|---|
| PF # | Description |
| PF 1 | Good cooperation given to the audit team by site and HQ team and good comment from stakeholder as per consultation. |

3.3.1 Status of Nonconformities Previously Identified and Observations

| Non-conformity | | | |
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| NCR Ref # | 2144368-202112-M1 | Issued Date | 17/12/2021 |
| Due Date | 16/3/2022 | Closure Date | 10/03/2022 |
| Indicator & Category (Critical / Minor) | 3.4.3 (critical) | | |
| Statement of Nonconformity: | Social management and monitoring plan for FY2021 had not been reviewed and updated in a participatory way. | | |
| Requirement Reference: | The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. | | |
| Objective Evidence: | <p>Hadapan POM</p> <p>External stakeholder (Sundry shop) - Concern raised by the sundry shop owner with regards to uncollected debt for those workers that repatriated. This issue has not been brought up to the management as the owner was not fully aware on the grievance/complaint process. The management has confirmed that no complaint received so far from the sundry shop owner for further assistance and rectification.</p> <p>Internal stakeholder (Union representatives) - The union representatives have raised a few concerns with regards to allowance entitlement and overtime issue for mill workers. For the allowance, they have claimed that previously boiler operator received special allowance called " elaun panas/stim". Status of this allowance entitlement has yet to be clearly discussed with the union representatives. The union leader has explained that he received complaints with regards to overtime deduction. Overtime approval and entitlement was not explained clearly to workers as they have interpreted differently from what has been explained by the management. None of these issues being discussed in the latest union meeting dated 13/12/21. The above issues have not captured in the latest SIA management plan updates in a participatory way.</p> | | |
| Corrections: | Mill will arrange meeting with sundry shop operator and meeting with union representative to discuss further on the issue raised by them and explain on the | | |

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| | grievance/complaint channel. Mill will review the SIA action plan and include the respective issues raised. |
| Root Cause Analysis: | <p>Awareness on complaint/grievance channel was found less effective since before this the awareness was given during stakeholder meeting. However, mill has yet to conduct the stakeholder meeting after restriction of movement caused by pandemic and no meeting conducted with the sundry shop owner within one year.</p> <p>This resulted the sundry shop owner was not fully aware with grievance/complaint process. Thus, the issue was not received at mill's end and yet to be updated in SIA management plan. The issues raised by union representatives was not discussed in latest union meeting due to no specific agenda to discuss on working time/OT/allowance issues during union meeting with mill management resulted the issues was left out to be discussed during the meeting to ensure workers representative fully understand on the said matters.</p> |
| Corrective Actions: | <p>Mill will disseminate brochure with information on complaint/grievance process to stakeholder and start to conduct normal stakeholder meeting periodically.</p> <p>Issues on working time/OT/allowance will be included in the management and workers/union representative meeting agenda. Any social related issues require longer time or other resource (i.e. budget, etc) which monitoring is needed will be included accordingly in SIA action plan Major NC close out verification:</p> <p>i) Dissemination of information was done via RSPO brochure to relevant stakeholders together with feedback form if they have any comments or feedbacks.</p> <p>ii) Meeting with NUPW representative was conducted on 22/12/2021 discussing on allowance and overtime issues which have been brought up previously during last audit. Based on the minute of meeting, the said allowance will be paid starting on January 2022. Overtime will be calculated if they need to come 30 minutes earlier than usual working hours. Interview with the NUPW representative has confirmed the decision on allowance and overtime issue. He did mentioned the special allowance was paid starting January 2022.</p> <p>iii) Meeting with the sundry shop owner was carried out 22/12/2021. Issues with regards to uncollected debt (goods) for repatriated workers has been discussed in the meeting. The owner shall report if the workers have not paid their accumulate debt to the management. Further verified with the sundry shop owner via interview has confirmed that debt amount has progressively reduced and as suggested cash term is preferable. He will continue to inform the management form time to time if there is any problem with worker's debt.</p> <p>iv) SIA management plan has been revised and updated to include site specific issues for further monitoring. SIA plan dated 4/3/22 is referred to. The new format is more detailed and specific with the action plan, person in charge assigned and timeline for completion.</p> |
| Assessment Conclusion: | Hence, the major NC is effectively closed on 10/3/2022 with sufficient evidence of implementation. Continuous implementation will be further verified in the next assessment. |
| Effectiveness Closure (for previous audit closed Critical NC): | Based on SIA management plan established on 04/03/2022, sighted Hadapan POM has identify areas of concerns/key findings, action plan, status, person incharge and completion date. Includes linesite / workers housing (Oil Palm Pal-OPP DSHC), grievance/complaint on working time / overtime allowance made known to all employees to be established, grievances procedures that are made known to all |

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| | <p>stakeholder to be established and any complaint by workers can be made in Social Dialogue Online Trackers (SDOT).</p> <ol style="list-style-type: none"> 1. Document review on minutes of NUPW meeting, Hadapan POM conduct on 31/10/2022 to discuss agenda include with 'Outstanding Special allowance 2018-2021' that to be paid in October 2022's salary. Based on the minutes of meeting three (3) workers being listed to receive arears from mill management for four (4) years from 2018 until 2021 as per listed of categories of employees in agreement Memorandum of Agreement Between MAPA and NUPW with MAPA Circular No.27/2022 updated 20/07/2022 mention special allowance MYR1.90 per day worked for Palm Oil Mill Employees. Due to disputes with workers, Industrial Relation Kluang Office has issued letter to Hadapan POM with title of 'Pertikaian Perusahaan Diantara NUPW Dengan Kilang Kelapa Sawit Hadapan Mengenai Kegagalan Majikan Membayar Elaun Khas (MYR1.90 Sehari) kepada En. Mohd Zaid Bin Zainal'. Due to the letter sent by Industrial Relation, Hadapan Palm Oil Mill has paid back to affected workers the arears for the last four (4) years on the rate that lack being paid since 2018 until 2021. Based on sampled payslips for November 2022, sighted Hadapan Palm Oil Mill includes MYR1.90 special allowance into Workers Normal Rate from MYR57.69 that become MYR59.59. 2. Document review on OPP – Housing Complaint records book, Hadapan POM maintain copy of complaint records from online system into books as monitoring. Based on the records, sighted 91 complaints received related to housing maintenance since 12/04/2021. Has latest complaint dated on 02/12/2022 request for housing maintenance has completed on 03/12/2022. 3. Document review on minutes Monday briefing record, sighted Hadapan POM conducts meeting includes agenda of grievance channel, complaint's stickers, housing maintenance, workers' rights, ILO requirements, etc. The briefing to workers conducts on 08/08/2022, 15/08/2022, 22/08/2022, 05/09/2022, 12/09/2022, 19/09/2022, 26/09/2022, 03/10/2022, 17/10/2022, 25/10/2022/ 31/10/2022, 07/11/2022, 21/11/2022 and 05/12/2022. 4. Document review sighted that grievance/complaint on working time/overtime/allowance been briefed to 148 workers and 2 contractors during Safety & Sustainability Townhall Southern Region FY2022 at Hadapan. 5. Briefing on handling grocery shop terms, grievance channel, contracts, safety, work scope and salary to sundry owner on 09/09/2022. The new contract agreement starts from 01/08/2022 until 31/07/2023 signed by new owner Ana Majid Enterprise, 202203163486 on 01/08/2022. The new owner has share list of grocery with prices contains 64 items includes cooking oils, breads, milk, onion, raw meat, raw chicken, raw fishes, etc. 6. Document review on minutes of meeting for Social Dialogue, Hadapan POM conduct meeting to discuss on workers safety, working hours, control of overtime based on FFB received, channel of grievances through online system (Oil Palm Pal - OPP), medical access, vacation leave pays, calculation of workers salary, new salary to be implement, housing amenities upkeep, maintenance & cleanliness, new Collective Agreement (AMESU & NUPW) status, etc. Dates of meetings on 22/04/2022, 30/06/2022, 15/07/2022, 27/07/2022, 11/08/2022, 26/08/2022, 12/09/2022, 23/09/2022, 07/10/2022, 19/10/2022, 01/11/2022, 15/11/2022, 26/11/2022 and 09/12/2022. 7. Hadapan POM monitor all grievances or complaints through SDOT online system collected from social dialogue meeting conduct twice a months. Document |
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| | review on the list extract from SDOT syste, sighted 66 issues being address by workers to Hadapan POM management with latest issued on 09/12/2022. |
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| Non-conformity | | | |
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| NCR Ref # | 2144368-202112-M2 | Issued Date | 17/12/2021 |
| Due Date | 16/03/2022 | Closure Date | 10/03/2022 |
| Indicator & Category (Critical / Minor) | 3.6.1 (Critical) | | |
| Statement of Nonconformity: | The risk controls that have been assessed in the HIRARC and contractor management were not adequately implemented and monitored. | | |
| Requirement Reference: | All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. | | |
| Objective Evidence: | <p>The risk controls that have been assessed in the HIRARC and contractor management were not adequately implemented and monitored in the mill and estate as below.</p> <p>Hadapan POM</p> <ul style="list-style-type: none"> • The HIRARC for Kernel Recovery Station states (PPE and training) identified as existing control measure to be comply with. Observed during site visit at Kernel Recovery Station, the said control measures were not being practiced and followed by the operator. • Sighted the Contract Agreement for Guna Sons Earthwork Constructions (Co. No. JM 0584860-T) stated "all contract workers are compulsory to be equipped with the basic personal protection equipment namely safety helmet, safety shoe, safety glasses, ear plug and safety gloves if necessary". Based of permit to work (PTW) dated 14/12/21, declaration in the pre-work checklist was found to be contrary with actual onsite condition observed. • Flashback Arrestor was not fixed for 1-unit oxygen and acetylene tanks that was used in the mill workshop. The hazard and risks associated with oxygen and acetylene tanks such as the decomposition which can generate heat and cause fire and explosions through flashbacks from welding & hot work operations and movement & separation of the gas and the porous mass inside the cylinder and its control measures has not been assessed in the HIRARC. <p>Seri Pulai Estate</p> <ul style="list-style-type: none"> • The HIRARC for Workshop (Welding – Flammable materials/substance) states: Existing Control – To install Flashback Arrestor for oxy tank. During the visit to the workshop, it was noticed that the Flashback Arrestor was not fixed for the oxygen and acetylene tanks that were being used. | | |
| Corrections: | <p>Mill will immediately ensure:</p> <ol style="list-style-type: none"> 1) Operator at Kernel recovery Station wear PPE accordingly as per stated in HIRARC. 2) Contractor Guna Sons wear PPE accordingly as per stated inside the contract agreement. 3) Mill to fix flashback arrestor for oxygen and acetylene tanks used in the mill workshop and included in the HIRARC. | | |

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| | <p>Seri Pulai Estate</p> <p>Flashback arrestor has been installed accordingly for the oxygen and acetylene tank used at Seri Pulai Estate. Briefing on control measure for potential hazard welding activity will be conducted to workshop personnel and the contractor.</p> |
| Root Cause Analysis: | <p>Hadapan POM</p> <p>Training on HIRARC and its implementation has yet to be conducted for the respective person in charge (Kernel Recovery Station, Guna Sons Contractor & Workshop) resulted the implementation was not in place.</p> <p>Seri Pulai Estate</p> <p>The oxygen and acetylene tank used at Seri Pulai Estate was not fixed with flashback arrest due to estate has outsourced the welding work since the estate's foreman has been advised to temporarily stop welding work while waiting for the re-test result for manganese test. However, no briefing given to the contractor on control measure as per HIRARC for the respective work resulted they use oxygen and acetylene tank without flashback arrestor</p> |
| Corrective Actions: | <p>Hadapan POM</p> <p>Mill will conduct refresher training on the control measure for Kernel Recovery Station Operators, workshop personnel, contractor and ensure control measure to be implemented immediately</p> <p>Seri Pulai Estate</p> <p>Safety briefing will be conducted to outsourced work/contractor will be included on the potential hazard control measure for related work as per Estate HIRARC.</p> <p>Major NC close verification:</p> <p>Hadapan POM</p> <p>i) PPE monitoring and compliance was done through workplace inspection and also permit to work (PTW) prior to work for contractor. Monthly workplace inspection was verified for workshop and kernel station in January 2022. No OSH non-compliance reported. As for oxygen and acetylene vessel standby set, it has been fully equipped with flashback arrestor for both vessels. PTW dated 5/3/22 was verified with the pictorial evidence of compliance for the contractor (Guna and Sons). Complete PPE worn by the operator and no OSH noncompliance reported.</p> <p>ii) HIRARC training was given to the workers and contractor (Guna and Sons) on 17/12/2021. This to create awareness on hazards and associated risk while doing their day to day work and task.</p> <p>Seri Pulai Estate</p> <p>i) Flashback arrestor has been installed as part of engineering control and fixed at each oxygen and acetylene vessel. Based on the purchase order (4502783976, dated 29/12/2021), the new unit for each vessel was installed for the ready to use unit. SSSO Site Sustainability and Safety Officer (SSSO) has visited the estate on 2/3/2022 to check on the implementation. Workplace inspection record for January 2022 was verified. No OSH non-compliance reported. Refresher training as conducted on 21/12/21 to all workshop operators. Evidence of training was verified and confirmed.</p> |
| Assessment Conclusion: | <p>Hence, the major NC is effectively closed on 10/3/2022 with sufficient evidence of implementation. Continuous implementation will be further verified in the next assessment.</p> |

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| Effectiveness Closure (for previous audit closed Critical NC): | The mill and estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. As per verification on HIRARC , all activity in mill and estate that have risk have been review in the latest HIRARC dated Jan 2022 and July 2022. Interview with contractor and workers also found they aware regarding to risk and have followed the safety guideline that have been established by the management. Sighted the implementation of protective personal equipment and safety precaution in Contractor workers was satisfied during site verification. Therefore, the major non-conformity remains closed. |
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| Non-conformity | | | |
|---|--|---------------------|--------------------|
| NCR Ref # | 2144368-202112-N1 | Issued Date | 17/12/2021 |
| Due Date | 16/12/2022 | Closure Date | Upgrade into Major |
| Indicator & Category (Critical / Minor) | 3.3.2 (minor) | | |
| Statement of Nonconformity: | The implementation of procedures was not consistently monitored. | | |
| Requirement Reference: | A mechanism to check consistent implementation of procedures is in place. | | |
| Objective Evidence: | <p>Hadapan POM</p> <p>The storage of Gearbox Oil was not in accordance with the Mill Quality Management System under the Occupational Safety Health Manual, Chapter 9 (Chemical Safety Management) states under No. 6.0 Procedures for Handling, iii. Ensure that containers is properly labelled, not damaged and no spillage during handling. During the site visit to the Mill Workshop, it was noticed that the gearbox oil was stored in plastic containers that were not labelled accordingly.</p> <p>Seri Pulai Estate</p> <p>It was noticed that Diesel was issued and temporarily stored in 20-liter containers and placed outside the workshop. The containers were not relabeled and/or did not have pictorial symbols such as "highly flammable substance/materials" attached to it.</p> | | |
| Corrections: | Hadapan Mill and Seri Pulai Estate has changed the container using suitable container and relabel accordingly for the gearbox oil and diesel. | | |
| Root Cause Analysis: | At Hadapan Mill and Seri Pulai Estate, it was found that awareness training on chemical handling was not fully include the MB/ tractor driver and workshop helper resulted the use of unsuitable container for diesel and gearbox oil. | | |
| Corrective Actions: | Mill and estate will conduct chemical handling training for workshop personnel and emphasize on the storage requirement (container suitability and relabelling). For estate the training also will be included the MB and tractor driver. | | |
| Assessment Conclusion: | Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment. | | |
| Effectiveness Closure (for previous audit closed Critical NC): | This NC was not close refer 2287730-202212-M2 | | |

| Non-conformity | | | |
|---|--|---------------------|------------|
| NCR Ref # | 2144368-202112-N2 | Issued Date | 17/12/2021 |
| Due Date | 16/12/2022 | Closure Date | 16/12/2022 |
| Indicator & Category (Critical / Minor) | 6.2.5 (minor) | | |
| Statement of Nonconformity: | Efforts to improve worker's access to affordable food was not effectively demonstrated | | |
| Requirement Reference: | The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. | | |
| Objective Evidence: | <p>CEP Rengam Estate</p> <p>Based on interview with workers representatives (NUPW and EWC), they have raised an issue with regards to expensive goods price at Kedai Runcit JK Maju. Further check at the sundry shop has confirmed that no price displayed especially for fresh and loose items (vegetables, onion, potatoes etc). This was not in compliance with Price Control Order (Indication of Price by Retailer) 1993.</p> | | |
| Corrections: | Estate will conduct meeting with sundry shop owner to discuss on the pricing and brief on the requirement of price display at the sundry shop | | |
| Root Cause Analysis: | Monitoring of pricing and price display was only conducted twice a year which was found not adequate and meeting with the sundry shop owner has yet to be conducted to discuss on the monitoring result. | | |
| Corrective Actions: | <p>Estate will conduct more regular (quarterly) price monitoring for the estate's sundry shop.</p> <p>Due to location of CEP Rengam Estate which located beside the main road and empty shop is available. Estate management has planned to get another vendor to open sundry shop at CEP Rengam Estate, so that estate's residence may have options/more variety of goods with healthy price competition among the shops.</p> | | |
| Assessment Conclusion: | Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment. | | |
| Effectiveness Closure (for previous audit closed Critical NC): | <p>CEP Rengam estate monitor sundry shop pricing by acquired the list from the shopper (Kedai Runcit JK Maju) with latest list as at March, June and September 2022. Total 51 items include with cooking oils, flour, raw rice, eggs, chicken, meat, vegetables, etc.</p> <p>Onsite interview with workers informed they have freedom to purchase groceries due to price been displayed.</p> <p>Onsite visit to Kedai Runcit JK sighted price displayed is available.</p> <p>Layang Estate share sundry shop which manage by Hadapan POM. Hadapan POM monitor sundry shop pricing by acquired the list from the shopper (Ana Majid Enterprise) latest list grocery total 64 items includes cooking oils, breads, milk, onion, raw meat, raw chicken, raw fishes, etc.</p> <p>Onsite visit to Kedai Runcit Hadapan, managed by Ana Majid Enterprise sighted price displayed is available.</p> | | |

| Non-conformity | | | |
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| NCR Ref # | 2144368-202112-N3 | Issued Date | 17/12/2021 |
| Due Date | 16/12/2022 | Closure Date | 16/12/2022 |

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| Indicator & Category (Critical / Minor) | 7.3.1 (minor) |
| Statement of Nonconformity: | The implementation of wastes management plan was not satisfactorily demonstrated. |
| Requirement Reference: | A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. |
| Objective Evidence: | Based on verification through Google Earth, the wastes landfill at Layang Estate (GPS: 1.816244, 103.450217), CEP Rengam Estate (GPS: 1.883646, 103.367359), Seri Pulai Estate (GPS: 1.610332, 103.481629) have residential areas and/or river or waterways within their 3 km radius distance. This is not in-line with the Landfill Management in Estate procedure [SD/SDP/PSQM(ESH)/203-EN7, rev. 0, dated 13/03/2017], Clause 6.3.3 a) and b) which reads: a) The landfill shall be located no less than 3 km away from nearest household area, offices or other premises b) The landfill shall be located no less than 3 km away from the nearest river or waterway |
| Corrections: | Estates will re-locate the area at the most suitable area as per required distance in the procedure |
| Root Cause Analysis: | Respective estates PIC was not fully aware on the distance requirement for landfill area as per the procedure and some estates facing challenge to find the suitable area due to estate's location and terrain factor. |
| Corrective Actions: | Estates will liaise with regional office to find outsource contractor for rubbish collection at municipal landfill area. |
| Assessment Conclusion: | Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment. |
| Effectiveness Closure (for previous audit closed Critical NC): | Newly established SOP on Waste Management Procedures for Upstream Malaysia, ref. CEOUM-HSE-013-05-2022 dated 11 May 2022 has superseded the previous SOP on Landfill Management in Estate procedure [SD/SDP/PSQM(ESH)/203-EN7, rev. 0, dated 13/03/2017]. This newly established SOP has further defined the radius for landfill selection within the estate. Verified during site visit, selection of landfill location was in line with the SOP (minimum 500 m from waterways and residential area). No recurrence of issue observed thus the previous minor NC was closed on 16/12/2022. |

| Opportunity for Improvement | |
|-----------------------------|---|
| OFI# | Description |
| OFI 1 | <p>OFI Statement: 2144368-202112-I1 (4.2.3) - Communication on the grievance/complaint mechanism has yet to be explained clearly to the relevant stakeholders. This to ensure that any concern raised via verbal complaints were recorded and acknowledged by the management for further action.</p> <p>Verification / Follow-up actions: Document review on OPP – Housing Complaint records book, CEP Rengam, Kulai Estate, Hadapan POM, Layang Estate and Seri Pulai Estate maintain copy of complaint records from online system into books as monitoring as follow:</p> |

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| | <p>1. CEP Rengam Estate with latest complaint dated on 15/12/2022 request for housing maintenance has completed on 18/12/2022 and signed by workers.</p> <p>2. Kulai Estate with latest complaint dated on 13/10/2022 request for housing maintenance has completed on 15/10/2022 and signed by workers.</p> <p>3. Hadapan POM with latest complaint dated on 02/12/2022 request for housing maintenance has completed on 03/12/2022 and signed by workers.</p> <p>4. Layang Estate with latest complaint dated 27/11/2022 request for housing maintenance has completed on 04/12/2022 and signed by workers.</p> <p>Seri Pulai Estate with latest complaint dated 14/12/2022 request for housing maintenance has completed on 16/12/2022 and signed by workers</p> |
| | <p>OFI Statement:</p> <p>2144368-202112-I2 (3.3.1) - The Chemical Safety Management Procedure; Doc Number: UM/HSE/OCP/04, can be further improved to include the Occupational Safety and Health (Use and Standards of Exposure of Chemicals Hazardous to Health) Regulations 2000, requirements VI which mentions about labelling and relabelling.</p> <p>Verification / Follow-up actions:</p> <p>As per site verification at chemical store found that the relabelling and labelling was conducted accordingly to Chemical Safety Management Procedure; Doc Number: UM/HSE/OCP/04 and also as per CLASS regulation 2013.</p> |
| | <p>OFI Statement:</p> <p>2144368-202112-I3 (2.1.1) - CEP Rengam Estate has its own sewage treatment plant at the staff Quarters to cater more than 130 housing units. The need of whether or not to notify the Department of Environment (DOE) in accordance to EQ (Sewage) Regulations 2009, Reg. 4 (1) and 4 (2), can be further improved by getting clarification directly from the DOE themselves</p> <p>Verification / Follow-up actions:</p> <p>The management already notify the Department of Environment regarding to sewage and to comply with the EQ (Sewage) Regulations 2009, Reg. 4 (1) and 4 (2). The management was in progress with Indah Water Konsortium Sdn Bhd for sewage disposal for all housing unit in estate.</p> |

3.3.2 Summary of the Nonconformities and Status

| CAR Ref. | Category (Critical / Minor) | P&C Indicator | Issued Date | Status & Date (Closure) |
|-------------------|-----------------------------|-----------------|-------------|-------------------------|
| 1997037-202012-M1 | Critical | 3.6.2 | 11/12/2020 | Closed on 10/03/2021 |
| 1997037-202012-M2 | Critical | 6.7.3 | 11/12/2020 | Closed on 10/03/2021 |
| 1997037-202012-N1 | Minor | 7.3.2 | 11/12/2020 | Closed on 17/12/2021 |
| 2144368-202112-M1 | Critical | 3.4.3 | 17/12/2021 | Closed on 10/03/2022 |
| 2144368-202112-M2 | Critical | 3.6.1 | 17/12/2021 | Closed on 10/03/2022 |
| 2144368-202112-N1 | Minor | 3.3.2 | 17/12/2021 | Upgrade into Major |
| 2144368-202112-N2 | Minor | 6.2.5 | 17/12/2021 | Closed on 16/12/2022 |
| 2144368-202112-N3 | Minor | 7.3.1 | 17/12/2021 | Closed on 16/12/2022 |
| 2287730-202212-M1 | Critical | 3.8.12 (iv) (a) | 16/12/2022 | Closed on 24/02/2023 |

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|-------------------|----------|--------|------------|----------------------|
| 2287730-202212-M2 | Critical | 3.3.2 | 16/12/2022 | Closed on 24/02/2023 |
| 2287730-202212-M3 | Critical | 7.2.11 | 16/12/2022 | Closed on 24/02/2023 |
| 2287730-202212-N1 | Minor | 7.12.7 | 16/12/2022 | 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 *SOU 24 Hadapan Pom and Supply base* Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

| Stakeholders contacted | | |
|--|--|---|
| Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities) | Stakeholder name / organization | Means of communication (e.g. face to face interview, email, phone interview, comment from public notice) |
| External - Local Communities | Kg. Melayu Raya | Face to face interview |
| External - Local Communities | Kg. Sri Gading Pulai | Face to face interview |
| External - Local Communities | Kg. Tengah Renggam | Face to face interview |
| External - Local Communities | Kg. Melayu Renggam | Face to face interview |
| External - Local Communities | Kg. Bahagian Rengam | Face to face interview |
| External - Local Communities | Kg. Paya Layang | Face to face interview |
| External - Independent Smallholder | Chen Fock Lin | Face to face interview |
| External - Contractor / Supplier | Evergreen Sdn. Bhd. | Face to face interview |
| External - Contractor / Supplier | Govinda Rajoo | Face to face interview |
| External - Contractor / Supplier | Bingan Jaya | Face to face interview |
| External - Contractor / Supplier | Leok Brothers Sdn Bhd | Phone interview |
| External - Contractor / Supplier | Rajendran Enterprise | Phone interview |
| Union | NUPW | Face to face interview |
| Internal | Gender committee representatives | Face to face interview |
| Internal | Local workers | Face to face interview |

| | | |
|----------|----------------------------------|------------------------|
| Internal | Foreign workers by nationalities | Face to face interview |
|----------|----------------------------------|------------------------|

| Stakeholders comment | |
|----------------------|--|
| 1 | <p>Feedbacks: Village Heads and Independent smallholder representative</p> <p>Representatives informed they continuously received good cooperation from management team from mill and estates. They agreed to inform that Sime Darby Plantation continuously provide with manpower assistance especially for cleaning and housekeeping of nearby villager's riparian. During this onsite interview, the representatives informed no land disputes occurred with between villagers and Sime Darby Plantations' certification units. Representatives inform certification units are continuously given offered for job vacancy to locals communities. From the offered, only few villagers applied for the to fill up the job vacancy offered.</p> <p>Audit Team verification and response:</p> <p>The management continue to maintain good relationship with neighbouring villagers and contribute whenever necessary</p> |
| 2 | <p>Feedbacks: Vendor / Supplier / Contractor</p> <p>Sime Darby Plantation continuously given opportunity on jobs / contracts offered via purchase order or contract and local work order. Sime Darby Plantation maintain payment made within timely manners as stated in term and conditions. The representatives informed they kept the signed agreement document as evidence on due diligence process.</p> <p>Audit Team verification and response:</p> <p>The management will continue to ensure payment make promptly and maintain good relationship with the suppliers/vendors/contractors.</p> |
| 3 | <p>Feedbacks: NUPW Representative</p> <p>The representative informed Sime Darby Plantation has remain with no pending issue lodged by workers as at time of audit. The representative will remain given full cooperation to Sime Darby Plantation to discuss workers benefits issue if lodge by workers. The representative informed they able to get feedback from workers is satisfied with current wages which is in accordance with collective agreement and within Minimum Wage Order 2021 requirement.</p> <p>Audit Team verification and response:</p> <p>The management will continue to ensure the workers are paying accordingly. No other issue.</p> |
| 4 | <p>Feedbacks: Gender Committee Representatives</p> <p>The representative informed during interview that they have not received any lodged on sexual harassment and violence case. The representatives informed they are working closely with mill & estates management to handle any possible lodged by female workers. They will remain execute their function as Gender committee member with the guidance by complaint procedures of any issues lodged. The representatives informed both mill and estates management continuously treated female workers equally without any discrimination.</p> <p>Audit Team verification and response:</p> <p>The management will respect the rights of female employees and monitor if there is any case of sexual harassment and violence happen. No further issue.</p> |
| 5 | <p>Feedbacks: Local workers</p> <p>They apply work with estates and mill based on the vacancy information spread by the head of villagers. They have been briefed on the terms and conditions and working environment in the plantations during the interview before been offer with the job they acquired. No contract substitution occurred. Their</p> |

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| | <p>wages are paid according to Minimum Wage Order 2021 and Collective Agreement. They interested to join as member of union, and they not been stop by management. During pick crop, they been offer voluntary to do job task outside working hour (overtime) for additional income.</p> <p>Audit Team verification and response: The management encourage local communities surrounded to apply for job to work with estates and mill will all amenities, benefit and good salary offered. Unfortunately, number of local workers applied below with manpower budget which still not enough to cover the operations job task. Management is always advertising the job vacancy in media social to attract local workers.</p> |
| 6 | <p>Feedbacks: Foreign workers They did not pay any recruitment fee for getting a job in Sime Darby Plantations. They have been briefed on the terms and conditions and working environment in the plantations while they were in home country. No contract substitution occurred. Their wages are paid according to Minimum Wage Order 2021 and Collective Agreement. During pick crop, they been offer for overtime on voluntary basis. They not been stopped to join as member of union by management. Some of them been selected as workers representative to the Joint Committee to discuss workers matter including benefits and wages by voting among themselves without management interfere.</p> <p>Audit Team verification and response: The management will continue to ensure employment law is being complied with.</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 |
| Sime Darby Plantation Estates in Hadapan POM have all undergone 2nd Cycle of Replanting therefore this is not applicable. | | | | | |

| Previous land owner / user comment | |
|------------------------------------|--|
| | Feedbacks: Nil |
| | Audit Team verification and response: Nil |

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

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| <p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that SOU 24 Hadapan Pom and Supply base has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that SOU 24 Hadapan Pom and Supply base is remain certified.</p> | |
| Report prepared by | Acceptance of Assessment Conclusion |
| Name: Muhamad Naquiuddin Mazeli | Name: SHYLAJA DEVI VASUDEVAN NAIR |
| Company Name: BSI Services Malaysia Sdn Bhd | Company Name: SIME DARBY PLANTATION BERHAD |
| Title: Lead Auditor | Title: Head, Sustainability Compliance Unit |
| <p>Signature:</p>  | <p>Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p>  |
| Date: 28/02/2023 | Date: 14 March 2023 |

Appendix A: Summary of Findings

| Criterion / Indicator | Assessment Findings | Compliance | |
|---|---|--|----------|
| Principle 1: Behave ethically and transparently | | | |
| Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making. | | | |
| 1.1.1 | <p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p> | <p>From the verification with stakeholder interview and verification during audit found that the documents required for all unit of certification available in SOU 24 Certification Unit have been made available to public as per below:-</p> <ol style="list-style-type: none"> 1. Land titles/user rights 2. Occupational health and safety plans 3. Plans and impact assessments relating to environmental and social impacts 4. HCV documentation 5. Pollution prevention and reduction plans 6. Details of complaints and grievances 7. Continuous improvement plans 8. Public summary of certification assessment report 9. Group Sustainability Policy 10. Record of contributions to community development <p>However the stakeholder or interested party need to send request and permission from the management unit for security information purposed.</p> | Complied |
| 1.1.2 | Information is provided in appropriate languages and accessible to relevant stakeholders. | There are no changes from the previous assessment verification. As per verification during this assessment the information available in appropriate languages and accessible to relevant stakeholders | Complied |

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| | - Minor compliance - | <p>through sample meeting latest conducted for whole SOU 24 external stakeholder on 09/11/2022 at CEP Rengam Estate Innovation Hall.</p> <p>In addition to that, the stakeholders been provided with the company's policy and feedback forms through email or by hand on during the stakeholders meeting to have feedback on matter impact based on operations near to their places.</p> | |
| 1.1.3 | <p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p> | <p>Request by stakeholders conducted through stakeholders meeting, visitor books, letter and forms. The operating units maintain records of all request and response.</p> <p>Hadapan Palm Oil Mill provided information as per letter request from Jabatan Perhubungan Perusahaan Kluang dated 12/10/2022. The request includes with mill's minutes of meeting and payment records of arrears for the special allowance for one of mill's staff.</p> | Complied |
| 1.1.4 | <p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p> | <p>Sime Darby Plantations established Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The manual has no changes.</p> <p>Sime Darby Plantations established Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. This has been communicated to workers during muster briefing and for external stakeholders via bulletin.</p> <p>Latest bulletin communication been communicated to external stakeholders during stakeholders meeting latest on 09/11/2022 at CEP Rengam Estate Innovation Hall.</p> <p>New mechanism for housing complaint report via QR code has been introduced in Q4 2021.</p> | Complied |

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| | | <p>Example</p> <p>Kulai Estate conduct briefing on Oil Palm PAL (OPP) the online reporting housing maintenance on 13/10/2022.</p> | |
| 1.1.5 | <p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p> | <p>Current stakeholders registered as List of Stakeholders Information Within Certification Unit which consists of stakeholders among Local Community Heads, Neighbors, Local Authorities, Vendors (Contractors & Suppliers) and Outside Crop Producers (OCP) per sample sighted as following:</p> <ol style="list-style-type: none"> 1. Layang Estate, updated on 01/09/2022 2. Hadapan POM, updated on 01/09/2022 3. CEP Rengam Estate, updated in 31/01/2022 4. Kulai Estate, updated in 01/09/2022 5. Seri Pulai Estate, updated on 01/10/2022 <p>The lists have the information about name of organization, address, contact person, contact number and type of business.</p> | Complied |
| <p>Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.</p> | | | |
| 1.2.1 | <p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p> | <p>Sime Darby Plantations established Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The policy was developed in Bahasa Malaysia and English.</p> <p>Sime Darby Plantations established latest Group Sustainability & Quality Policy Statement also includes the clause 'promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC) signed by Group Managing Director on 02/12/2019. The code of business code has no changes.</p> <p>The policy has been briefed to the workers during morning</p> | Complied |

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| | | <p>briefing. Besides, policies were briefed to stakeholders during the stakeholder meeting.</p> <p>Example</p> <p>Kulai Estate conduct briefing on COBC to workers on 31/03/2022 and 01/04/2022.</p> | |
| 1.2.2 | <p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p> | <p>Sime Darby Plantations established the Vendor Integrity Pledge and Vendor COBC as a due diligence for external parties engaged by Operating Units.</p> <p>Sighted sampled as below:</p> <ol style="list-style-type: none"> 1. Leok Brothers Sdn Bhd signed on 01/01/2022 valid till 31/12/2022 2. Ragendran Enterprise signed on 01/01/2022 valid till 31/12/2022 3. Evergreen Sdn Bhd signed on 01/01/2022 valid till 31/12/2022 4. Govinda Rajoo signed on 01/01/2022 valid till 31/12/2022 <p>Jaafar Md Sah signed on 01/01/2022 valid till 31/12/2022.</p> | Complied |
| Principle 2: Operate legally and respect rights | | | |
| Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations. | | | |
| 2.1.1 | <p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p> | <p>The mill & estates continue to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. Among the evidence of compliance verified were:</p> <p><u>Hadapan POM</u></p> <p>MPOB 510425004000 for milling, FFB kept, buying FFB and Others. Valid from 01/03/2022 until 28/02/2023</p> <p>Poison license for purchase permit for Sodium Hydroxide, referred license 011396 dated 01/01/2022</p> | Complied |

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| | | <p>License for river abstraction under Johor Water Enactment 1921 BAKAJ/334/300/05/02/08/03 valid until 31/12/2022 for 1000m³/day.</p> <p>License for wages deduction for electricity (BHG.PU/9/129 JLD 33 (53) dated 06/07/2017.</p> <p>PMT license was available for air receiver under registration JH PMT 11238 valid until dated 07/09/2023.</p> <p>PMD license was available for Boilers under registration JH PMD 302 valid until dated 26/12/2023</p> <p><u>CEP Renggam Estate</u></p> <p>MPOB License, #508444202000, valid until 31/03/2023</p> <p>MPOB License for nursery, 621196011000, valid until 31/07/2023</p> <p>License for river abstraction under Johor Water Enactment 1921 BAKAJ:334/300/05/07/06/33 valid until 31/12/2022.</p> <p>PMT license PMT-JH/22 171067 (PMT149077) valid until 04/07/2023</p> <p>Permit to store diesel, #J005306 (18,000L) and Petrol RON95 (200L), valid until 20/12/2023.</p> <p>Calibration record D059823 for weighbridge DE18005074 dated 01/08/2022.</p> <p><u>Kulai Estate</u></p> <p>MPOB License, #508509102000, valid until 31/03/2023</p> <p>Permit to store diesel, #J003786 (10,000L), valid until 29/05/2024</p> <p>Permit to store diesel, #J003789 (8,000L), valid until 25/07/2024</p> <p>Calibration weighbridge record DE18003856 for dated 07/06/2023</p> <p>Air Receiver license from DOSH for JH PMT 5096 valid until 06/02/2024</p> <p>Calibration record from De Metrology Sdn Bhd for M.P.K(E) 40,000kg X10kg M. Toledo IND 2H6 dated 04/10/2022(D050528)</p> | |
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| | | <p>Calibration record from De Metrology Sdn Bhd for M.P.K(E) 40,000kg X10kg M. Toledo IND 2H6 dated 03/01/2022 (D049414)</p> <p><u>Layang Estate</u> MPOB License,#508443402000, valid from 01/04/2022 until 31/03/2023 Permit Diesel #J002092 (32,760L) valid from 06/04/2021 until 05/04/2023 Calibration record from De Metrology Sdn Bhd for M.P.K(E) 40,000kg X10kg M. Toledo IND 2H6 dated 01/12/2022(D052335) License for wages deduction for Mosque referred; TK(NJ)U-23 13/03/2019 License for wages deduction for electricity (BHG.PU/9/129 JLD 33 (53) dated 06/07/2017.</p> <p><u>Seri Pulai Estate</u> MPOB License #520195002000, valid from 01/05/2022 until 30/04/2023. Permit Diesel #J004297 (18,000L) valid from 09/11/2021 until 08/11/2024 License for river abstraction under Johor Water Enactment 1921 BAKAJ:334/300/05/02/07/06 valid until 31/12/2022. License for wages deduction for electricity (PTKJB/PERMIT/52768) dated 05/06/2007.</p> | |
| 2.1.2 | <p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p> | <p>Addressed in Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008. A mechanism to ensure compliance to legal and other requirement has been</p> | Complied |

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| | | documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 24. PSQM Department and the respective operating units will undertake the responsibility of identifying, managing, updating, and tracking the legal requirement as well as monitoring the status of legal compliance. The latest updated was on 05/12/2022 on Fire Services Act 1988 (Act 341) Amendment 2020, Minimum Wages Order 2022, Employee Social Security (Amendment) Act 2022 and Employment Insurance System (EIS) (Amendment) Act 2022. | |
| 2.1.3 | Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance - | Based on site visit at the sampled estates' boundary, methods used are trenching, PVC pegs (painted with red and white) and roads. The demarcations were visibly maintained as verified at the following sites: - CEP Renggam Estate: Field #10A and smallholders (1°54'40"N; 103°22'53" E) - Layang Estate: Field #10A and smallholder (1°48'7"N; 103°26'53" E) | Complied |
| Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements. | | | |
| 2.2.1 | A list of contracted parties is maintained. - Minor compliance - | The mill and estates in SOU 24 have listed and maintain all contracted parties and documented in List of Stakeholder as parts of their stakeholders includes internal such as employee and workers union and external stakeholders such as FFB suppliers, local community heads, government agencies. - Hadapan POM Stakeholders List FY 2022; Date: 1/7/2022 - CEP Renggam Estate Stakeholders List FY 2022; Date: 1/3/2022 - Layang Estate Stakeholders List FY 2021; Date: 1/1/2022 - Kulai Estate Stakeholders List FY 2021; Date: 1/1/2022 | Complied |

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| | | - Seri Pulai Estate Stakeholders List FY 2021; Date: 1/1/2022 | |
| 2.2.2 | <p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p> | <p>All contracted parties/vendors were required to signed Vendor Integrity Pledge (VIP) and to comply with all applicable laws and regulations related anti-bribery, fraud and corruption and Vendor Code of Business Conduct (VCOBC) such as labour and Human Rights. Sighted samples were signed :-</p> <p>BXXXX Sdn Bhd, agreement no. P/P/1221/FFB03426L, validity 01/01-31/12/2022</p> <p>AXXXXX Sdn Bhd, agreement no. P/P/1221/FFB03423L, validity 01/01-31/12/2022</p> <p>The training also been given to contractor dated 30/08/2022.</p> | Complied |
| 2.2.3 | <p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p> | <p>The contract signed with contractors is sighted in Hadapan POM, Layang Estate, Seri Pulai Estate and Kulai Estate with contractors, contained clause 5.8, abolishment of child labour & protecting the rights of children available in the Vendor COBC and Human Rights Charter protecting the rights of children.</p> | Complied |
| Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources. | | | |
| 2.3.1 | <p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p> | <p>The mill has 4 estates supplying FFB within the certification scope consists Layang estate, CEP Renggam estate, Kulai estate and Seri Pulai estate. The mill has compiled the evidences for all its suppliers on the information on geo-location of FFB origins, evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder, one or more supporting documents for claims and valid MPOB license.</p> | 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>There were several indirectly sourced FFB and the mill is still in the process of collecting the information described in 2.3.1. There are 11 OCP where send the FFB to the Hadapan POM. The detail available in Hadapan POM.</p> <p>For SOU 24 Hadapan, the Sime Darby Plantation HQ already register with RSPO as per email to RSPO dated 11/11/2022 where to comply with RSPO Announcement dated 15 February 2022 on Interim Measure for Fulfilment of Indicator 2.3.2 of the 2018 RSPO Principles & Criteria — On Legality of Indirect FFB Supplies.</p> | Complied | | | | | | |
| Principle 3: Optimise productivity, efficiency, positive impacts and resilience | | | | | | | | | |
| Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability. | | | | | | | | | |
| 3.1.1 | <p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p> | <p>The business plan for the mill is reflected in the form of annual budget (MPLAN) and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilization rate and CAPEX.</p> <p>The business or management plan for the estates were presented in the form of annual budget (MPLAN) with 4 years projection (2022 – 2026). The annual budget contains the crop projection and the finance allocation for field operation and administrations. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.</p> | Complied | | | | | | |
| 3.1.2 | <p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p> | <p>The estates have prepared the replanting programme with minimum of 5 years projection. The review of the programme is done at the end of every year. Below are the details of the programme:</p> <table border="1" data-bbox="1137 1289 1930 1327"> <tr> <td>Estate</td> <td>2023</td> <td>2024</td> <td>2025</td> <td>2026</td> <td>2027</td> </tr> </table> | Estate | 2023 | 2024 | 2025 | 2026 | 2027 | Complied |
| Estate | 2023 | 2024 | 2025 | 2026 | 2027 | | | | |

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| | | CEP Renggam Estate | 177.92 | 286.70 | 155.41 | 235.24 | 165.29 | |
| | | Kulai Estate | 73.18 | 127.07 | 0 | 0 | 161.74 | |
| | | Layang Estate | 0 | 0 | 132.15 | 260.55 | 247.47 | |
| | | Seri Pulai Estate | 73.37 | 165.59 | 144.58 | 243.56 | 76.09 | |
| 3.1.3 | The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance - | <p>Management review meeting for the operating units were last conducted on 17/10/2021 in CEP Renggam Estate. The meetings were chaired by the managers of the operating units and attended by the key personnel.</p> <p>Among the agenda discussed were:</p> <ul style="list-style-type: none"> • Results of internal audit • Customer feedback • Status of preventive and corrective actions • Follow-up actions from previous management review • Changes that could affect management system • Recommendations for improvement | | | | | | Complied |
| Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations. | | | | | | | | |
| 3.2.1 | (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance - | <p>The mill and supply base estates have established the main social and environment improvement plans as stated in the Continuous Improvement Plans. The Continues Improvement Action plan have been developed based on the areas and issues of concern that have been raised. As per verification on the previous action plan as per below;-</p> <p>Social Improvement Plan</p> | | | | | | Complied |

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| | | <p>developed as per the following:</p> <ol style="list-style-type: none"> 1. Housing condition/living improvement. 2. Workers safety and health during pandemic COVID19 3. Accommodation upgrades (bedstead/mattress/fan/wardrobe) <p>From the interview and document review, the management already improved the housing condition like new painted house for all workers housing this project was complete on Oct 2022. For the bedstead, mattress and wardrobe this verified during site visit at workers housing and record received by workers. There also verified no new cases COVID 19 sampling estate. The management also already establish standard procedure if any outbreak happen in the future. This was aware by the staff and workers verified during interview session.</p> | |
| <p>3.2.2</p> | <p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p> | <p>The Certification Unit has completely filled its RSPO metrics template version 2.1 and submitted to the CB prior to this assessment. The input data was found to be accurate based on the following records verification:</p> <ul style="list-style-type: none"> • SAP accounting system • Land titles • Complaints & grievance records • Dept. of Safety & Health’s JKPP8 form | <p>Complied</p> |
| <p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p> | | | |

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| <p>3.3.1</p> | <p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance -</p> | <p>SOU 24 Hadapan POM management unit continued to use the documents established by Sime Darby Plantation Bhd among others as follows;</p> <ul style="list-style-type: none"> a) Plantations / Mill Quality Management System (PQMS / MQMS) Manual b) PQMS/MQMS Standard Operating Manual & Procedures (SOP) c) Palm Oil Mill Lab Process Control Procedure / Oil Mill Lab operations & Test Method Guidelines d) Sustainable Plantation Management System (SPMS) Manual e) RSPO Supply Chain Manual f) ESH Management System Manual - 01/7/2012 g) Occupational Safety and Health Manual h) Pictorial Safety Standards dated 17/3/2008 i) Laboratory Process Control Manual j) Security Guidelines. <p>In addition, technical guidelines as listed in the Agricultural Reference Manual were also used. In general the documents included operation activities in the estates and the mills from;</p> <ul style="list-style-type: none"> a) seedlings in nursery to planting of young palms. b) plantation upkeep to mill FFB receipt, grading, processing. c) quality analysis and dispatch of CPO & PK. d) security in the SOU. <p>Contents of the Manual were disseminated to the workers through;</p> <ul style="list-style-type: none"> a) morning muster b) mill weekly briefings c) training as ad hoc and programmed basis. | <p>Complied</p> |
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| | | <p>The Manuals are also kept in the administration office to facilitate reference by any interested parties. Site inspection and interview with workers confirmed that the SOPs had been implemented and the employees understood the requirements of the SOPs.</p> <p>In addition, there are also manuals available within the industry and MPOB that are used as guidelines. The procedures were communicated to workers through training and infield supervision. Interview with workers showed that the information in the procedures had been effectively communicated. Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP</p> | | | | | | | | | | | | | | | | | | | |
|-------------------|--|--|----------------|---------------|---------|------------|-----------|--|--------------|-----------|--|----------------|--------------------|---------|-------------------|--------------|--------------------|--------------|-----------|---------------------|-----------------------|
| <p>3.3.2</p> | <p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p> | <p>The mechanism for checking the implementation procedure is in place.</p> <p>1. Annual RSPO/MSPO internal audit.</p> <table border="1" data-bbox="1151 847 1926 1080"> <thead> <tr> <th>Operating unit</th> <th>Date of audit</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>CEP Rengam</td> <td>4/10/2022</td> <td>6 major 4 minor, NC close out on 8/12/2022</td> </tr> <tr> <td>Kulai Estate</td> <td>6/10/2022</td> <td>3 major 1 minor, NC close out on 8/12/2022</td> </tr> </tbody> </table> <table border="1" data-bbox="1151 1134 1912 1367"> <thead> <tr> <th>Operating unit</th> <th>Date of assessment</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>CEP Rengam Estate</td> <td>19-30/9/2022</td> <td>Overall score: 57%</td> </tr> <tr> <td>Kulai Estate</td> <td>26/4/2022</td> <td>Overall scope: 63 %</td> </tr> </tbody> </table> | Operating unit | Date of audit | Remarks | CEP Rengam | 4/10/2022 | 6 major 4 minor, NC close out on 8/12/2022 | Kulai Estate | 6/10/2022 | 3 major 1 minor, NC close out on 8/12/2022 | Operating unit | Date of assessment | Remarks | CEP Rengam Estate | 19-30/9/2022 | Overall score: 57% | Kulai Estate | 26/4/2022 | Overall scope: 63 % | <p>Non-compliance</p> |
| Operating unit | Date of audit | Remarks | | | | | | | | | | | | | | | | | | | |
| CEP Rengam | 4/10/2022 | 6 major 4 minor, NC close out on 8/12/2022 | | | | | | | | | | | | | | | | | | | |
| Kulai Estate | 6/10/2022 | 3 major 1 minor, NC close out on 8/12/2022 | | | | | | | | | | | | | | | | | | | |
| Operating unit | Date of assessment | Remarks | | | | | | | | | | | | | | | | | | | |
| CEP Rengam Estate | 19-30/9/2022 | Overall score: 57% | | | | | | | | | | | | | | | | | | | |
| Kulai Estate | 26/4/2022 | Overall scope: 63 % | | | | | | | | | | | | | | | | | | | |

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| | | <table border="1"> <tr> <td>Layang Estate</td> <td>27-29/9/2022</td> <td>Overall scope: 63 %</td> </tr> </table> <p>2.SCRA (Structured Crop Recovery Assessment)</p> <p>3. SORA (Structured Oil Recovery Assessment)</p> <table border="1"> <tr> <td>Operating unit</td> <td>Date of assessment</td> </tr> <tr> <td>Hadapan POM</td> <td>19-30th September 2022</td> </tr> </table> <p>As per Personal protective Equipment (SD/SDP/PSQM(ESH)/201-OS16) dated January 2015 stated:-</p> <p>6.1.1.10 Employers should ensure that the employees who are required to wear PPE are fully informed of the requirements and of the reasons for them, and are given adequate training in the selection, wearing, maintenance and storage of this equipment. Found that the reception station attendant in Hadapan POM was wearing rubber boots. This was not in line with the SOU 24 Hadapan POM HIRARC for Reception Station that states Existing Control: Safety Shoes.</p> <p>There also found mechanism to monitor faulty machineries were not effectively implemented. It was noticed that the Shovel reverse siren was not functioning. Interview with the driver indicated that the siren has not been functioning for the last 2 months. Nevertheless, the shovel driver has not reported the issue to the current management. This was against the UM HSE Management System – OSH Risk Management Procedure (Doc Number: UM/HSE/SP/01) which states "To identify all the hazards in the workplace."</p> | Layang Estate | 27-29/9/2022 | Overall scope: 63 % | Operating unit | Date of assessment | Hadapan POM | 19-30 th September 2022 | |
| Layang Estate | 27-29/9/2022 | Overall scope: 63 % | | | | | | | | |
| Operating unit | Date of assessment | | | | | | | | | |
| Hadapan POM | 19-30 th September 2022 | | | | | | | | | |

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| | | <p>Verified that the daily checklist prior to operation did not capture faulty parts as well. Thus Major NC was raised due to reoccurrence NC from previous report.</p> | |
| <p>3.3.3</p> | <p>Records of monitoring and any actions taken are maintained and available. - Minor Compliance -</p> | <p>The implementation of SOP are monitored on a daily basis by the field staffs and Assistant Managers with overall overview by the Managers. The monitoring is made via supervision and records maintenance. The estates among others maintained the following records.</p> <ul style="list-style-type: none"> a) Work program / Field cost books b) Bin cards, Harvesting Intervals, c) Monthly Estate Report and Account, d) Monthly Operations, monthly rainfall, e) Pest and diseases monthly return, f) agrochemical monthly consumption g) Harvesting details i.e. daily inspection report - yield improvement program, h) Summary of machinery running hours i) Harvesting records detailing the number of bunches harvested j) Quantity of loose fruit collected by each harvesters. k) Monthly FFB production, etc. <p>Similarly for the mill, the monitoring records maintained among others were related to;</p> <ul style="list-style-type: none"> a) Monitoring of effluent / black smoke b) Processing & produce parameters c) Dispatches / scheduled wastes etc. d) Monitoring consistent implementation of procedures through internal audit e) Daily shift report for the process performance. | <p>Complied</p> |

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| | | <p>f) There was a flow chart showing method for monitoring compliance of requirements including legal requirements.</p> <p>g) Internal audits are performed once a year minimum.</p> <p>Activities carried out by contractors are being monitored via the following among others;</p> <ul style="list-style-type: none"> a) to obtain work permit for confined spaces or work at height in the Mill b) evidences of competency for specialized work/job c) The mill supervisors and engineers will be onsite to monitor the work. d) The estates monitor to ensure that no contractors bring along their family members to work in the field. e) The estates ensure that the contractors are providing PPE, suitable working equipment and machinery. <p>For example, environmental audit carried out twice per year/license period by DOE license auditor. Summary of audits carried out as per the following:</p> <table border="1" data-bbox="1153 1008 1926 1399"> <thead> <tr> <th>License period</th> <th>Date of visit</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>2nd for July 2022 – June 2023 DOE audit tracking no. JAS.JHQ600-3/1/16(19), DOE registered auditor, CESSWI 4065,3706</td> <td>7th November 2022</td> <td>No non-conformance raised.</td> </tr> <tr> <td>1st for July 2022 – June 2023 DOE audit tracking no. AS(B)</td> <td>15th May 2022</td> <td>No non-conformance raised.</td> </tr> </tbody> </table> | License period | Date of visit | Remark | 2 nd for July 2022 – June 2023 DOE audit tracking no. JAS.JHQ600-3/1/16(19), DOE registered auditor, CESSWI 4065,3706 | 7 th November 2022 | No non-conformance raised. | 1 st for July 2022 – June 2023 DOE audit tracking no. AS(B) | 15 th May 2022 | No non-conformance raised. | |
|---|-------------------------------|--|----------------|---------------|--------|---|-------------------------------|----------------------------|---|---------------------------|----------------------------|--|
| License period | Date of visit | Remark | | | | | | | | | | |
| 2 nd for July 2022 – June 2023 DOE audit tracking no. JAS.JHQ600-3/1/16(19), DOE registered auditor, CESSWI 4065,3706 | 7 th November 2022 | No non-conformance raised. | | | | | | | | | | |
| 1 st for July 2022 – June 2023 DOE audit tracking no. AS(B) | 15 th May 2022 | No non-conformance raised. | | | | | | | | | | |

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| | | <p>J31/152/000/084 Jld.10(04), DOE registered auditor, CESSWI 3596, 4065</p> | | | |
| <p>DOE field citation report was also verified. Refer to report, JAS/ATOP1/08/2015 dated 19/10/22. Issues related to i-remote installation, EFB storage and compliance towards license condition were highlighted by DOE. Related correspondence were verified and those issue highlighted were actioned and updated in the management plan for monitoring and follow-up.</p> | | | | | |
| <p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p> | | | | | |
| <p>3.4.1</p> | <p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -</p> | <p>No new planting at SOU24. Social Impact Assessment (SIA) Report for SOU 24 on 03/02/2014 – 07/02/2014 by Social & Environmental Projects Unit, PSQM Department. The report includes both positive and negative impact and its recommendation. Nonetheless, the assessment of environmental impact of its existing activities is documented in the following documents:</p> <ol style="list-style-type: none"> 1. Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register 2. Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI 3. Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE <p>Example:</p> | | | <p>Complied</p> |

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| | | <p>Layang Estate established own SIA management plan year 2022 updated 01/10/2022 includes Housing condition / living improvement, social dialogue, linesite / workers housing (oil palm pal-OPP DSHC) and replanting.</p> <p>Based on document review as follow:</p> <ol style="list-style-type: none"> 1. Layang Estate established road program for year 2022 due to social concern on field road conditions. The program includes the maintenance road for all 29 fields at focus area such as roadside pruning, grading/resurfacing and road side sit. 2. Layang Estate maintained OPP DSHC with 143 complaints being recorded latest dated 13/12/2022 related to housing maintenance. 3. Layang Estate conduct social dialogue with workers dated on 04/02/2022, 15/02/2022 - 27/05/2022, 11/10/2022, 27/10/2022-estate management has explained to the involve driver about the SOP of this initiative, all drivers are understanding about the SOP, 11/11/2022, 26/11/2022, 08/12/2022. 4. Layang Estate conduct briefing to worker during muster morning as follow:- <ol style="list-style-type: none"> i. Briefing on OPP system to workers dated 03/01/2022 ii. Briefing on medical access to workers dated 07/01/2022. iii. Briefing on safe keeping passport / emergency leave to workers dated on 08/02/2022. iv. Briefing on freedom of movement to workers dated on 11/01/2022. | |
| 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. | There is no new planting in SOU 24 (Hadapan POM Certification Unit). Methodology of assessment is based on interview at workstation for harvesters, sprayers, union representatives, gender committee, contractor, supplier, local community, | Complied |

| | <p>- Minor Compliance -</p> | <p>neighboring estate, government & School. The secondary data collection – document review/file checking also been made. Main aspects/concerns identified by the assessor:</p> <ol style="list-style-type: none"> 1. Housing condition/living improvement 2. Working condition <p>This plan have been verified and found the issue that been input was been raised during stakeholder meeting and workers meeting.</p> <p>The aspect and impact analysis for all the mill/estate operations are documented on Jan 2022 and revised annually. In the comprehensive report, the study of aspect and impact are aimed to;</p> <ol style="list-style-type: none"> a. Plan to avoid negative impact and to promote positive impacts. b. Reduction disposal of waste taking into consideration of social responsibilities. c. Plan to reduce pollution and release of GHG d. Development and implementations. <p>The aspect and impact covered the following activities/operations among others;</p> <table border="1" data-bbox="1167 1134 1917 1326"> <thead> <tr> <th colspan="4">Estates</th> </tr> <tr> <th></th> <th>Activities</th> <th></th> <th>Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Poisoning of VOPs/ woodies</td> <td>7</td> <td>Vehicle maintenance by contractors</td> </tr> <tr> <td>2</td> <td>Circle spraying</td> <td>8</td> <td>EFB application</td> </tr> </tbody> </table> | Estates | | | | | Activities | | Activities | 1 | Poisoning of VOPs/ woodies | 7 | Vehicle maintenance by contractors | 2 | Circle spraying | 8 | EFB application | |
|---------|-----------------------------|--|------------------------------------|--|--|--|--|------------|--|------------|---|----------------------------|---|------------------------------------|---|-----------------|---|-----------------|--|
| Estates | | | | | | | | | | | | | | | | | | | |
| | Activities | | Activities | | | | | | | | | | | | | | | | |
| 1 | Poisoning of VOPs/ woodies | 7 | Vehicle maintenance by contractors | | | | | | | | | | | | | | | | |
| 2 | Circle spraying | 8 | EFB application | | | | | | | | | | | | | | | | |

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| | | <table border="1"> <tr> <td>3</td> <td>Management of empty containers</td> <td>9</td> <td>Fertilizer storage /application</td> </tr> <tr> <td>4</td> <td>Rat baiting</td> <td>10</td> <td>Grass slashing</td> </tr> <tr> <td>5</td> <td>Diesel Reception</td> <td>11</td> <td>Chemical's storage</td> </tr> <tr> <td>6</td> <td>Triple rinsing</td> <td>12</td> <td>Grading of FFB</td> </tr> </table> | 3 | Management of empty containers | 9 | Fertilizer storage /application | 4 | Rat baiting | 10 | Grass slashing | 5 | Diesel Reception | 11 | Chemical's storage | 6 | Triple rinsing | 12 | Grading of FFB | | |
| 3 | Management of empty containers | 9 | Fertilizer storage /application | | | | | | | | | | | | | | | | | |
| 4 | Rat baiting | 10 | Grass slashing | | | | | | | | | | | | | | | | | |
| 5 | Diesel Reception | 11 | Chemical's storage | | | | | | | | | | | | | | | | | |
| 6 | Triple rinsing | 12 | Grading of FFB | | | | | | | | | | | | | | | | | |
| 3.4.3 | <p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p> | <p>Where the negative and positive impact to the stakeholder it have been discuss during stakeholder meeting. It was sighted the minute meeting and verified.</p> | <p>There is no new planting in SOU 24 (Hadapan POM Certification Unit). Sighted the Social Action Plan for 2021 based on the SIA and issues raised through the gender committee, internal and external communication as the input for the SIA development. Management plan developed FY2022 for visit OUs as the following: Example: Hadapan POM has identify areas of concerns/key findings, action plan, status, person in-charge and completion date. Includes linesite / workers housing (Oil Palm Pal-OPP DSHC), grievance/complaint on working time / overtime allowance made known to all employees to be established, grievances procedures that are made known to all stakeholder to be established and any complaint by workers can be made in Social Dialogue Online Trackers (SDOT).</p> <ol style="list-style-type: none"> 1. Document review on minutes of NUPW meeting, Hadapan POM conduct on 31/10/2022 to discuss agenda include with 'Outstanding Special allowance 2018-2021' that to be paid in October 2022's salary. Based on the minutes of meeting three (3) workers being listed to receive arears from mill management for four (4) years from 2018 until 2021 as per | Complied | | | | | | | | | | | | | | | | |

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| | | <p>listed of categories of employees in agreement Memorandum of Agreement Between MAPA and NUPW with MAPA Circular No.27/2022 updated 20/07/2022 mention special allowance MYR1.90 per day worked for Palm Oil Mill Employees. Due to disputes with workers, Industrial Relation Kluang Office has issued letter to Hadapan POM with title of 'Pertikaian Perusahaan Diantara NUPW Dengan Kilang Kelapa Sawit Hadapan Mengenai Kegagalan Majikan Membayar Elaun Khas (MYR1.90 Sehari) kepada En. Mohd Zaid Bin Zainal'. Due to the letter sent by Industrial Relation, Hadapan Palm Oil Mill has paid back to affected workers the arears for the last four (4) years on the rate that lack being paid since 2018 until 2021. Based on sampled payslips for November 2022, sighted Hadapan Palm Oil Mill includes MYR1.90 special allowance into Workers Normal Rate from MYR57.69 that become MYR59.59.</p> <ol style="list-style-type: none"> 2. Document review on OPP – Housing Complaint records book, Hadapan POM maintain copy of complaint records from online system into books as monitoring. Based on the records, sighted 91 complaints received related to housing maintenance since 12/04/2021. Has latest complaint dated on 02/12/2022 request for housing maintenance has completed on 03/12/2022. 3. Document review on minutes Monday briefing record, sighted Hadapan POM conducts meeting includes agenda of grievance channel, complaint's stickers, housing maintenance, workers' rights, ILO requirements, etc. The briefing to workers conducts on 08/08/2022, 15/08/2022, 22/08/2022, 05/09/2022, 12/09/2022, 19/09/2022, 26/09/2022, 03/10/2022, 17/10/2022, 25/10/2022/ 31/10/2022, 07/11/2022, 21/11/2022 and 05/12/2022. 4. Document review sighted that grievance/complaint on working | |
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| | | <p>time/overtime/allowance been briefed to 148 workers and 2 contractors during Safety & Sustainability Townhall Southern Region FY2022 at Hadapan.</p> <ol style="list-style-type: none"> 5. Briefing on handling grocery shop terms, grievance channel, contracts, safety, work scope and salary to sundry owner on 09/09/2022. The new contract agreement starts from 01/08/2022 until 31/07/2023 signed by new owner Ana Majid Enterprise, 202203163486 on 01/08/2022. The new owner has share list of grocery with prices contains 64 items includes cooking oils, breads, milk, onion, raw meat, raw chicken, raw fishes, etc. 6. Document review on minutes of meeting for Social Dialogue, Hadapan POM conduct meeting to discuss on workers safety, working hours, control of overtime based on FFB received, channel of grievances through online system (Oil Palm Pal - OPP), medical access, vacation leave pays, calculation of workers salary, new salary to be implement, housing amenities upkeep, maintenance & cleanliness, new Collective Agreement (AMESU & NUPW) status, etc. Dates of meetings on 22/04/2022, 30/06/2022, 15/07/2022, 27/07/2022, 11/08/2022, 26/08/2022, 12/09/2022, 23/09/2022, 07/10/2022, 19/10/2022, 01/11/2022, 15/11/2022, 26/11/2022 and 09/12/2022. 7. Hadapan POM monitor all grievances or complaints through SDOT online system collected from social dialogue meeting conduct twice a month. Document review on the list extract from SDOT system, sighted 66 issues being address by workers to Hadapan POM management with latest issued on 09/12/2022. | |
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| Criterion 3.5: A system for managing human resources is in place. | | | |
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| 3.5.1 | Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance - | Sime Darby Plantations’s Human Resource Department established Hiring of Local Workers procedure (Doc. No.: 01-12-19) dated 01/12/2019 and Workforce Management Unit Liaison & Recruitment procedure (WMU/LR-SOPP/MARCH2016, Rev. 0 dated 30/03/2016), New Foreign workers management at operating units, SD/SDP/PSQm(ESH)/204-OD 16, revision 01 updated 05/04/2017. The procedure has no changes and describes the recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried out by the HQ through appointed agents in respective countries. | Complied |
| 3.5.2 | Employment procedures are implemented, and records are maintained. - Minor Compliance - | Application form, employment interview assessment form, medical check-up report and employment contract was sighted for new recruited employees. Example Kulai Estate: Briefing on terms and conditions workers agreement and consent letter to workers on 24/05/2022, 28/05/2022 and 08/06/2022. The latest recruitment of workers in CEP Rengam Estate, Kulai Estate, Hadapan POM, Layang Estate and Seri Pulai Estate were by November 2022 A copied of identification card was kept as record. Interviewed with the clerk confirmed that if there is any job vacancy available, they will publish a job vacancy advertisement/flyer at the places nearby the villages. | Complied |
| Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented. | | | |
| 3.6.1 | (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. | The mill and estates had identified and reviewed significant hazards and risks and determined appropriate risk control | Complied |

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| | <p>- Critical (Major) compliance -</p> | <p>measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following: Hadapan POM HIRARC dated 01/07/2022 CHRA (HQ/06/ASS/00/223-2018/005) dated 12/07/2018 conducted by Environmental And Industrial Hygiene Services/Consultancy. Noise Risk Assessment (Baseline) (HQ/LPROYKPEB/21/00303) dated 2-3/10/2020 Noise Risk Assessment (Review) (HA/LPROYKPEB/21/00406) dated 18/3/2021</p> <ul style="list-style-type: none"> - Change in work process - Revision/changes in legislative requirement - Occurrence of accidents <p>Based on the risk assessments, appropriate risk control measures were determined and implemented for the respective activities and operation.</p> <p>CEP Renggam Estate CHRA (HQ/15/ASS/00/363-2020-153) dated 26/06/2020 from Nisafety Consultancy. There also additional CHRA for year 2022 (HQ/15/ASS/00/363-2022-031) dated 05/03/2022. NRA (Report Ref:HQ/LPROYKPEB/21/00316) dated 24/8/2020 by ETOSH Consult & Engineering Pt. As per recommendation Audiometric test been conducted on 09/10/2021 for baseline. Result showed total workers 30 have attended the Audiometric test for baseline and 12 workers have hearing loss/hearing impairment/permanent Standard Threshold shift need for OHD verification. JKPP 7 reported dated 07/01/2022.</p> | |
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| | | <p>In Kulai Estate Latest CHRA was done on 25/06/2020 by competent person with DOSH reg. no. HQ/15/ASS/00/363. Briefing on the findings was done on 07/08/2020. Noise Risk Assessment (Baseline) from ETOSH Consult & Engineering Pt.(Report Ref. HQ/LPROYKPEB/21/00322) dated 26/8/2020. Annual & Baseline Audiometric Testing Report dated 1/9/2021 by Procoma Environmental (M) Sdn Bhd. From the report found 2 abnormal audiogram that need for OHD referral. The further referral already conducted on 13/12/2021.</p> <p>In Layang Estate Noise Risk Assessment conducted on 25/8/2020 (HQ/LPROYKPEB/20/00). This assessment conducted by ETOSH Consult & Engineering Pt. From this assessment there certain activities been survey such as workshop foreman, tractor driver, MTG driver, MB driver, Zenoah blower operator and Knapsack grass cutter operator. CHRA (ref; HQ/15/ASS/00/363-2020-154) dated 26/06/2020. This assessment conducted by Nisafety Consultancy.</p> <p>Seri Pulai Estate CHRA was conducted on 29th June 2020 by Nisafety Consultancy (Dosh Reg Number: HQ/15/ASS/00/363). The CHRA Report (Report Number: HQ/15/ASS/00/363-2020-156) was available for verification. The CHRA action plan was available and done according to the recommendation. Medical Surveillance was conducted on July 2022 for workers exposed to chemicals and fumes in the estate at Klinik Rengam. The results indicated that all workers were fit to work with no occupational related health issues.</p> | |
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| | | <p>NRA was conducted by Etosh Consult & Engineering Plt. On 20/07/2020 by NRA Assessor - – Nur Izzati Salleh (NRA Reg. No.: HQ/16/PEB/00/158); NRA Report Number: HQ/LPROYKPEB/21/00155.</p> | | | | | | | | | | | | | |
|----------------------|--|---|----------------------|------------------------|---------------------------|---------|----------|------|-----|----------|-----------|-----|-----|----------|-----------------|
| <p>3.6.2</p> | <p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p> | <p>The CU has established and documented safety and health plan. The plan was monitored on timely basis by the person responsible assigned. Sighted the implementation of the management plan as follows: Hadapan POM CHRA (HQ/06/ASS/00/223-2018/005) dated 12/07/2018 conducted by Environmental And Industrial Hygiene Services/Consultancy. From the implementation of CHRA as per below:- Medical surveillance (Report No. 093/OHD/2021) conducted at Kilinik Segamat (Dr Ling kay Kwong). 19 workers have been send for medical surveillance. From the record all workers are fit to work with chemical. There also conducted chemical exposure monitoring on 11/1/2022 by Procoma Environmental (M) Sdn Bhd. The parameter monitored on n-Hexane, manganese and inhalable dust. The record as per below:-</p> <table border="1" data-bbox="1151 1139 1926 1353"> <thead> <tr> <th>Monitoring Parameter</th> <th>Exposure level (mg/m3)</th> <th>PEL, TWA- 8 hours (mg/m3)</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>n-Hexane</td> <td>1.17</td> <td>176</td> <td>Complied</td> </tr> <tr> <td>Manganese</td> <td>0.2</td> <td>0.6</td> <td>complied</td> </tr> </tbody> </table> | Monitoring Parameter | Exposure level (mg/m3) | PEL, TWA- 8 hours (mg/m3) | Remarks | n-Hexane | 1.17 | 176 | Complied | Manganese | 0.2 | 0.6 | complied | <p>Complied</p> |
| Monitoring Parameter | Exposure level (mg/m3) | PEL, TWA- 8 hours (mg/m3) | Remarks | | | | | | | | | | | | |
| n-Hexane | 1.17 | 176 | Complied | | | | | | | | | | | | |
| Manganese | 0.2 | 0.6 | complied | | | | | | | | | | | | |

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| | | <p>Noise Risk Assessment (Baseline) (HQ/LPROYKPEB/21/00303) dated 2-3/10/2020 Noise Risk Assessment (Baseline) (HA/LPROYKPEB/21/00406) dated 18/3/2021.</p> <p>Audiometric test (Annual & Baseline) report ref: PRO/SEP/21(KKSC/65)JKKP/2020/11-04/0001) conducted on 1/9/2021 at Procoma Environmental (M) Sdn Bhd. From the result there are 7 abnormal result already resend for further investigation at OHD Doctor dated 18-25/11/2021.</p> <p>CEP Renggam Estate</p> <p>Audiometric test been conducted on 09/10/2021 for baseline. Result showed total workers 30 have attended the Audiometric test for baseline and 12 workers have hearing loss/hearing impairment/permanent Standard Threshold shift need for OHD verification. JKKP 7 reported dated 07/01/2022. The latest assessment conducted on 17/10/2022 with total 26 workers have been sent for audiometric test. The result still pending with Nisafety Consultany.</p> <p>Medical surveillence conducted on 02/11/2022 at Klinik Renggam. The total workers involved was 26 workers and the result showed all fit to work with chemical.</p> <p>Layang estate</p> <p>The medical surveillence conducted 3 phase in Layang estate as per below;-</p> <p>Date: 01/09/2022 (5 workers) Date: 02/09/2022 (5 workers) Date: 03/09/2022 (4 workers)</p> <p>The medical surveillence conducted at Klinik Renggam. From result showed was fit to work with chemical.</p> | |
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| | | Audiometric Test conducted on 01/11/2021 and involved 13 workers (grass cutter and tractor driver) at Nisafety Consultancy. From the result on 21/04/2022 showed that 2 workers was confirm with NIHL and JKKP 7 send on 21/04/2022. | |
| Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained. | | | |
| 3.7.1 | <p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p> | The training programmed were documented in training matrix of the operating units on annual basis. The matrix has the information about subjects of trainings and time to be conducted. Generally, the topics of training cover the subjects related to best practices, OHS, environmental and social in which also taking into account gender-specific needs. | Complied |
| 3.7.2 | <p>Records of training are maintained.</p> <p>- Minor Compliance -</p> | <p>Records of trainings were maintained by the mill and all estates as verified below:</p> <p>Hadapan POM</p> <p>Safety Briefing and training for My Team (Contractor) dated 02/12/2022</p> <p>Safety briefing on Laboratory dated 28/10/2022</p> <p>Tractor driving safety dated 11/8/2022</p> <p>Chemical handling & Scheduled waste training dated 17/3/2022</p> <p>PPE and working at height briefing and incident dated 14/7/2022</p> <p>HIRARC training and PPE dated 17/12/2021</p> <p>Hearing conservation training dated 18/8/2022</p> <p>CEP Renggam Estate</p> <p>Hearing Conservation training conducted on 13/10/2022</p> <p>Fire Drill Training and ERP dated 26/03/2022</p> <p>First aid Training conducted on dated 08/03/2022</p> | Complied |

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| | | <p>Human Right Charter And Human Right Defender Briefing dated 29/08/2022 Briefing of ILO related issue to all AP dated 26/08/2022 Safety and sustainability Townhall dated 05/09/2022 Kulai Estate Briefing on Minimum wages, passport & statutory reduction dated 14/01/2022 Briefing on Grieving Channel, and estate procedure dated 06/01/2022 My Crop Training for spraying & replacement obsolete dated 08/03/2022 Hearing Conservation Programme Training dated 16/03/2022 Payslip training dated 16/06/2022 HCV refresher Training dated 17/06/2022 First aid training dated 26/08/2022 Trunk Injection Training dated 17/09/2022 Safety briefing on working at height dated 26/09/2022 Policy training and briefing on MSPO and RSPO dated 30/09/2022 Oil Spillage & SW Code training dated 03/12/2022</p> | |
| 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. - Minor Compliance -</p> | <p>The last training on supply chain was conducted on 21/06/2022 at meeting room KKS Hadapan. It was conducted by the Sustainability Department and attended by 9 participants from various departments of the mill such as management, security, supervisors, weighbridge, laboratory, CPO contractor and estates' assistant managers. For contractor training already conducted on 18/05/2022 for SCCS training included transporter</p> | Complied |

| Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C) . However it will not contribute to suspension if there is more than 5 non-compliance within a principle) | | | |
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| 3.8.1 | <p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p> | <p>Not Applicable because this mill was received uncertified and certified FFB as well as Hadapan POM applied to use MB model instead.</p> | Not Applicable |
| 3.8.2 | <p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p> | <p>Hadapan Mill receives FFBS only from its own supply base mainly Hadapan Estate, Layang Estate, Kulai Estate and CEP Renggam Estate. There also Sembrong Estate, Tun Dr. Ismail Estate, Bukit Badak Estate, Pekan Estate, Lambak Estate and Ulu Remis Estate send the FFB to Hadapan POM with total 9155.36 mt. There also OCP that send the around 20% of total production.</p> | Complied |
| 3.8.3 | <p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p> | <p>The forecasted FFB that could be process in the next license period is 250,791.48mt with estimated OER of 19.70 % and KER of 5.02%.</p> | Complied |

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| 3.8.4 | The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform. | The registration of PalmTrace is done by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Details of registration are as follows: Member's ID: RSPO_PO1000000301 License valid until 28-03-2023 Member category: Oil Mill | 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"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. | <p>The traceability sop already been established by the management under name Sustainable Supply Chain and Traceability Procedure, version no:1 approved on May 2022 (SD/SDP/GSD/SCCS/0522/01). This covered control of documents and records, delivery of FFB from the estate, receiving FFB at the mill, process monitoring, CPO and PK dispatch, non-conforming material/product, product claims, production volume, conversion factor, internal audit, outsourced contractor, training, reclassification of mill's supply chain model, complaints and management review.</p> <p>Hadapan Palm Oil Mill has prepared a dedicated records and Forms in relation to RSPO Supply Chain Certification.</p> <p>Sustainability training plan & records for year 2022 was available for verification. Training on SCCS was last conducted on 21/06/2022. Interview with weighbridge operators found that they understood the requirements of supply chain for palm oil mill. In the supply chain sop, there already identified every responsible personal who involved in the implementation RSPO Supply Chain Certification. Roles and responsibility for RSPO Supply Chain team were clearly defined clause 4.0 responsibilities and 5.0 Control of Documents &Records. From the SOP the responsibility under the Head of Operating Unit. Based on interview, the person in-charge was able to demonstrate good understanding of the established procedure.</p> | Complied |
| 3.8.6 | Internal Audit | Addressed in Sustainable Supply Chain and Traceability Procedure, version no:1 approved on May 2022 (SD/SDP/GSD/SCCS/0522/01) | Complied |

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| | <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports. | <p>under section 18.0 Internal Audit procedure. Based on the procedure, the internal audit is to be conducted annually as per Internal Audit Procedure. Refer SOP ref. no. SD/SDP/PSQM/IAP. Combined internal audit for supply chain was last conducted on 03/10/2022 by 4 internal auditors from Group Sustainability and Quality Management Department. There were 5 non-conformity reports related to RSPO raised as a result of the internal audit. The mill has taken appropriate corrective action to close the NCR. Based on records, the NCR were closed on 15/08/2022. The results of Internal Audit were discussed in the Management Review Meeting as sighted in minutes meeting conducted on 01/11/2022.</p> | |
| 3.8.7 | <p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. | <ul style="list-style-type: none"> i)The accompanying documents of incoming FFB from own estate are estate’s weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate’s ticket number is recorded in the mill’s ticket number. ii) There has been no projected overproduction during the period under reviewed. Nonetheless, based on interview with the staff, the facility is aware of this requirement iii)Handling of non-conforming FFB and/or documents is addressed in the Sustainable Supply Chain and Traceability Procedure, version no:1 approved on May 2022 (SD/SDP/GSD/SCCS/0522/01) under 11.0 Non-conforming products and Document. | Complied |
| 3.8.8 | Sales and Goods Out | Hadapan POM ensured the required information is available in document form. Based on sampled contracts [i.e. | Complied |

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| | <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"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. | <p>S/PSD/2208/PK0101, S/PSD/2206/CPO0174G] the following information was available:</p> <ul style="list-style-type: none"> • The name and address of the buyer • The name and address of the seller • The loading or shipment/ delivery date • The date on which the documents were issued • A description of the product, including the applicable supply chain model, e.g. "RSPO CSPK MB" or "RSPO CSPO MB" • The quantity of the products delivered • Related transport documentation, e.g. Dispatch note • Supply chain certificate number of the seller • A unique identification numbers - available in a few forms e.g. DN no., seal no., etc. <p>The management also have appointed Mr Azharol Amir as SCCS representative as per appointment letter dated 1/1/2022</p> | |
| <p>3.8.9</p> | <p>Outsourcing Activities</p> <ol style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ol style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable | <p>No FFB and/or oil palm products processing outsource by Hadapan mill except for CPO delivery transportation only. The mill adapted Sime Darby established Standard Operating procedure for outsourced activities as per Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability Procedure, doc. ID: SD/SDP/GSD/SCCS/0522/01 ver. 1 dated 1st June 2022, Section 13.0: Outsourced Contractors.</p> <p>In the SOP under section 13.1 stated that CPO Mill cannot outsourced processing activities like refining or crushing.</p> | <p>Complied</p> |

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| | <p>agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p> | <p>The list of outsourced contractors was registered in List of Stakeholder records that CPO transporter as per sighted contract agreement as following:</p> <p>Sing Rubber & Transport Sdn Bhd; Transportation of Crude Palm Oil ("CPO") (Service) for Sime Darby Plantation Berhad's Peninsular Malaysia's Oil Mills – Letter of Award (LOA); Reference Number: T/SDPN/PEN/CPO/0720/003; Dated: 20/07/2020 and 05/08/2020; Contract period valid for 3 years from 01/11/2020 – 31/10/2023.</p> <p>The Letter of Award is used as the documented control system that states all procedures and processes which is bound by the contractor.</p> <p>Stated under section 5(d)(iii), 'permit the CB appointed by the company to conduct audit on its or its sub-contractors' operations and provide access to all relevant systems, documents and records when requested by the CB.</p> | |
| 3.8.10 | <p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p> | <p>No FFB and/or oil palm products processing outsource by Hadapan mill except for CPO delivery transportation only. For PK, transportation arranged by buyer to the KCP. The list of outsourced contractors was registered in List of Stakeholder records that included the CPO transporter.</p> | Complied |
| 3.8.11 | <p>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.</p> | <p>Sime Darby has issued Memorandum to all contractors dated 26/6/2019. In the memorandum stated the contractors have to comply as follows.</p> <ol style="list-style-type: none"> 1. Comply with local legal requirements 2. Attend the RSPO/ISCC/MSPO/SCCS briefing or training organized by the company | Complied |

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| | | <ol style="list-style-type: none"> 3. Having signed and enforceable agreement with the company 4. Provide access to the auditors to contractors' operation site(s) and employees whenever deemed necessary 5. Having related working permits <p>There are no changes of the contractor list as per verification on stakeholder list dated June 2022. The management also aware that if any changes of contractor will inform the CB. This confirm during interview with top management and PIC.</p> | |
| 3.8.12 | <p>Record keeping</p> <ol style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ol style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. | <ol style="list-style-type: none"> i) All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible. Related purchasing goods in and sales good out report in the earlier indicator under 3.8.7 and 3.8.8. ii) The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 in SOP for Sustainability Supply Chain and Traceability Procedure doc. ID: SD/SDP/GSD/SCCS/0522/01 ver. 1 dated 1st June 2022, iii) NA as the mill is using MB model iv) All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are recorded on a three-monthly basis in the mill's mass balance accounting sheet. The data was mostly sourced from the mill's Daily Production Report. Based on RSPO Mass Balancing Record for Oil Mills (Hadapan Mill); Negative stock recorded after CSPK delivery in February 2022. Total closing stock for RSPO MB recorded at -35.40 mt. Stock was not balanced within 3 months and total of - 525.56 mt accumulated for April 2022 | Non-compliance |

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| | 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. | closing stock. Negative stock accumulated until end November 2022 with total of - 1240.34 mt. Thus Major NC was raised. | |
| 3.8.13 | <p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p> | Conversion factor of CPO and PK production is depending on the actual OER and KER where the actual OER from was 19.17% where estimation was increase into 19.70%. For KER for PK was increase from 4.82% into 5.02% as estimation for next cycle. | Complied |
| 3.8.14 | Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate. | Daily OER and KER of FFB processed recorded in the daily figure report on daily basis which were based on actual measurement of production stocks. The report of production report was available and verified. | Complied |
| 3.8.15 | <p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p> | NA as the mill is under Mass Balance module. | Not Applicable |
| 3.8.16 | <p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p> | <p>The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Sampling a per record below:-</p> <p>Transaction ID; TR-d06XXXX-2113 Shipping date: 1/5/2022 Shipping announcement date: 19/5/2022</p> <p>RSPO certified volumes sold under different scheme or as conventional were not registered in the RSPO PalmTrace.</p> | Complied |

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

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| 4.5 | Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat. | Not applicable as no off-product claim made by Hadapan POM as to date. | Not Applicable |
| Business to business communications | | | |
| 5.1 | Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products. | Corporate communication is managed at Sime Darby Plantation Berhad HQ level. However in mill the communication can be found during CPO and PK selling via shipping documentation and invoices to the next supply chain actor or buyer. | Complied |
| 5.2 | When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made. | From the weighbridge ticket as per RSPO contract, its stated that i.e. product/commodity with SCC model (CPO/Palm Kernel RSPO MB) and RSPO certificate number. | Complied |
| 5.3 | <p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p> | Not Applicable as corporate communication is managed at Sime Darby Plantation Berhad HQ level and Hadapan Mill was not distributor or wholesaler. | Not Applicable |
| Business to consumer communication | | | |

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

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| | <p>supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p> | | |
| MODULE B – MASS BALANCE SPECIFIC RULES | | | |
| Minimum Mass Balance content | | | |
| | <p>95% or above of the oil palm content must be RSPO MB-certified.</p> | <p>Hadapan POM is producing CPO MB which 100% from MB certified portion.</p> | <p>Complied</p> |
| | <p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p> | <p>Hadapan POM only applies MB model and the conventional CPO are downgraded from MB whenever demanded.</p> | <p>Complied</p> |
| Labelling and trademark (MB) | | | |
| | <p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> Surrounded by the text: 'Certified sustainable palm oil'. The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. | <p>Hadapan POM only applies MB model and the conventional CPO are downgraded from MB whenever demanded. No RSPO trademark been used as per site interview and document review in Hadapan POM.</p> | <p>Complied</p> |

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| | <ul style="list-style-type: none"> • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. | | |
| Messaging (MB) | | | |
| | <p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. | <p>Hadapan POM only applies MB model and the conventional CPO are downgraded from MB whenever demanded. From the verification no storytelling in product related in Hadapan POM.</p> | <p>Complied</p> |
| Principle 4: Respect community and human rights and deliver benefits | | | |

| Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders. | | | |
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| 4.1.1 | <p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p> | <p>Sime Darby Plantations established Group Sustainability & Quality Policy Statement signed by Group Managing Director dated 02/12/2019. The policy has no changes, and it describes the company in respecting, upholding & no - exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC).</p> <p>The HRC was last revised in August 2020 and no changes since then. They promote the human rights, safeguard democracy and its institutions and not violate the rights of others. They also recognize the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, they are committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as respond to complaints on any alleged threats made to them.</p> <p>Refer to Policy on the Protection of Human Rights Defenders (HRDs) dated 25/03/2020 for more information. The policy has no changes since then. Policy on the Protection of HRDs FINAL.pdf (simeдарbyplantation.com).</p> <p>The policies were communicated to stakeholders during stakeholder meetings latest conducted for whole SOU 24 external stakeholder on 09/11/2022 at CEP Rengam Estate Innovation Hall.</p> <p>Example Kulai Estate conduct briefing on RSPO policy to workers on 30/09/2022.</p> | Complied |

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| 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>Sime Darby Plantations prohibits any form of harassment in their operation as per the policies above.</p> <p>Onsite interviewed with the workers confirmed that no harassment by the management.</p> | Complied |
| <p>Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p> | | | |
| 4.2.1 | <p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p> | <p>Sime Darby Plantations established Human Rights Charter last revised 2020. The charter has no changes, and it describes the responsibility to promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognise the important role Human Rights Defenders, whistle blowers, complainants and community spokespersons play by lodging complaints in confidence.</p> <p>The policy has no changes since then.</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>Sime Darby Plantations established Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. The procedure has no changes, and it describes on initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders.</p> <p>Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in https://www.simedarbyplantation.com/corporate/whistleblowing.</p> <p>Besides, the company has implemented "Suara Kami" as a platform for the workers to raise any issue.</p> <p>Onsite interview workers from Hadapan Palm Oil Mill and its supply based, informed they been briefed on the complaint mechanism</p> | Complied |

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| | | <p>during morning muster. Besides, external stakeholders were briefed during the stakeholder meeting.</p> <p>Onsite interviewed with internal and external stakeholders informed they been briefed on the complaint mechanism implemented by the management of mill and estates.</p> <p>The latest initiative at Kulai Estate where conducted briefing on whistleblowing, Workers Helpline, Suara Kami (Grievance channel on 06/01/2022 and 12/01/2022.</p> | |
| 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>Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented "Suara Kami" as a platform for the workers to raise any issue. The workers in Hadapan Palm Oil Mill were briefed on the complaint mechanism during morning muster. Besides, external stakeholders were briefed during the stakeholder meeting. Interviewed with the internal and external stakeholders confirmed that they have been briefed and understood on the complaint mechanism implemented by the company.</p> <p>Onsite interview with internal & external stakeholders; and document review verify SOU 24 keeps parties to a grievance informed of progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders in addressing issues raised by stakeholders.</p> <p>Furthermore, neither any complaints nor land dispute occurred in the SOU 24 Certification Unit at the time of audit as verified through stakeholder consultation.</p> <p>Example:</p> | Complied |

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| | | Kulai Estate conduct briefing on grievance channel to workers on 01/10/2022. | |
| 4.2.4 | The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance - | Sime Darby Plantations established Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008. The document has no changes and it describes on the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow. | Complied |
| Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities. | | | |
| 4.3.1 | Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance - | Sime Darby Plantations contributions to local sustainable development with consultation with local communities and discuss the issues includes social and environment benefits. The contribution made been includes the solutions to address on educations, donations, tree planting, etc. The program demonstrated in the company's website as per link as following: http://www.yayasansimedarby.com/our-projects/community health Latest program conduct on 22/10/2022 with 72 volunteers from Sime Darby Plantation Southern Region, collectively geotagged close to 6,000 forest trees planted in Gunung Mas Estate, Johor. SOU 24 Hadapan do make donation contribution to stakeholders include following: <ol style="list-style-type: none">1. Donation for religious worship – temple and surau/masjid.2. Donation and distribution of essential item to nearby villagers. Zakat Wakalah initiative and iftar programme for Johor South Zone. | Complied |
| Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent. | | | |

| <p>4.4.1</p> | <p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p> | <p>SOU24 estates were able to demonstrate the evidence of legal ownership if its lands through possession of land titles. The estates has a list of all its land titles which have the information about names of lease, hectare, terms & conditions, lease period and grant numbers. Copies of the land titles were available at the estate’s offices while the original were kept at headquarter</p> <table border="1" data-bbox="1137 571 1933 1378"> <thead> <tr> <th data-bbox="1137 571 1294 651">Estate</th> <th data-bbox="1294 571 1581 651">Land title</th> <th data-bbox="1581 571 1749 651">Land Use type</th> <th data-bbox="1749 571 1933 651">Tenure</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 651 1294 1273">CEP Rengam (Total land titles: 59)</td> <td data-bbox="1294 651 1581 1273"> 1. GRN530156 (GRN 23852) Lot: 3921 (2075) Land area: 1,035.00ha District: Kluang Issued on 10/02/2016. </td> <td data-bbox="1581 651 1749 1273">Agricultural</td> <td data-bbox="1749 651 1933 1273">Freehold (Perpetuity Ownership)</td> </tr> <tr> <td data-bbox="1137 1273 1294 1378">Kulai</td> <td data-bbox="1294 1273 1581 1378"> 1. GRN 236123 Lot: 5032 </td> <td data-bbox="1581 1273 1749 1378">Agricultural</td> <td data-bbox="1749 1273 1933 1378">Freehold (Perpetuity Ownership)</td> </tr> </tbody> </table> | Estate | Land title | Land Use type | Tenure | CEP Rengam (Total land titles: 59) | 1. GRN530156 (GRN 23852) Lot: 3921 (2075) Land area: 1,035.00ha District: Kluang Issued on 10/02/2016. | Agricultural | Freehold (Perpetuity Ownership) | Kulai | 1. GRN 236123 Lot: 5032 | Agricultural | Freehold (Perpetuity Ownership) | <p>Complied</p> |
|------------------------------------|---|--|---------------------------------|------------|---------------|--------|------------------------------------|--|--------------|---------------------------------|-------|----------------------------|--------------|---------------------------------|-----------------|
| Estate | Land title | Land Use type | Tenure | | | | | | | | | | | | |
| CEP Rengam (Total land titles: 59) | 1. GRN530156 (GRN 23852) Lot: 3921 (2075) Land area: 1,035.00ha District: Kluang Issued on 10/02/2016. | Agricultural | Freehold (Perpetuity Ownership) | | | | | | | | | | | | |
| Kulai | 1. GRN 236123 Lot: 5032 | Agricultural | Freehold (Perpetuity Ownership) | | | | | | | | | | | | |

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| | | Total land titles: 24) | Land area: 585.581ha District: Kulaijaya Issued on 26/12/2007. | | |
| | | | 2. GRN 237360 Lot: 3632 Land area: 772.5437ha District: Kulaijaya Issued on 28/12/2007. | Agricultural | Freehold (Perpetuity Ownership) |
| | | | Hadapan POM HSD: 39413 Lot: MLO 6529 Land area: 1,133.1198ha District: Kulaijaya Issued on 27/12/2007. | Palm Oil Only | Freehold (Perpetuity Ownership) |
| | | | Seri Pulai Estate (Total land titles: 7) | 1. GRN 326461 Lot: 2938 Land area: 1,420.4444ha District: Kulaijaya Issued on 10/02/2009. | Agricultural |

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| | | | 2. GRN 326462 Lot: 2940 Land area: 370.4891ha District: Kulaijaya Issued on 10/02/2009. | Agricultural | Freehold (Perpetuity Ownership) | |
| 4.4.2 | Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include: | <p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>In order to deal with future arising land dispute (if applicable), Sime Darby Plantation established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.</p> | | | Complied | |
| 4.4.2a | Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance - | <p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>In order to deal with future arising land dispute (if applicable), Sime Darby Plantation established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders.</p> | | | Complied | |
| 4.4.2b | Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance - | <p>There is no land dispute recorded. This was verified through stakeholders' consultation. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust</p> | | | Complied | |

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| | | free, prior and informed consent (FPIC) process to any new developed. | |
| 4.4.2c | Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance - | No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land. | Complied |
| 4.4.3 | (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance - | There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), Sime Darby Plantation established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders. | Complied |
| 4.4.4 | All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance - | There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), Sime Darby Plantation established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders. | Complied |
| 4.4.5 | (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance - | There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), Sime Darby Plantation established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust | Complied |

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| | | free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders. | |
| 4.4.6 | There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance - | There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), Sime Darby Plantation established Human Rights Charter last revised 2020, under Clause 3.1.1 on handling conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed, communication, consultation and complaints from external stakeholders. | Complied |
| Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions. | | | |
| 4.5.1 | (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance - | No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. | Not Applicable |
| 4.5.2 | (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance - | No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. | Not Applicable |
| 4.5.3 | Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement | No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. | Not Applicable |

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| | with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance - | | |
| 4.5.4 | To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance - | No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. | Not Applicable |
| 4.5.5 | Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance - | No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. | Not Applicable |
| 4.5.6 | Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance - | No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. | Not Applicable |
| 4.5.7 | New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance - | No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. | Not Applicable |
| 4.5.8 | (C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance - | No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. | Not Applicable |

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| <p>Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p> | | | |
| 4.6.1 | <p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -</p> | <p>Sime Darby Plantations established Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has no changes and it describes the process on any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p> | Complied |
| 4.6.2 | <p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -</p> | <p>SOP as per indicator 4.6.1.</p> | Complied |
| 4.6.3 | <p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -</p> | <p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p> | Complied |
| 4.6.4 | <p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -</p> | <p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p> | Complied |
| <p>Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p> | | | |

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| 4.7.1 | <p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -</p> | <p>Sime Darby Plantations established Flowchart and Procedures on Handling Land Disputes; version 1 dated 01/11/2008. The procedure has no changes, and it describes the process on any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of</p> | Complied |
| 4.7.2 | <p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -</p> | <p>SOP as per indicator 4.7.1.</p> | Complied |
| 4.7.3 | <p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -</p> | <p>There was no community that have lost access and rights to land for plantation expansion as the operating units expands the planting area under certified area. It was confirm during interview with local communities where all operating unit under Hadapan Mill has been planted with oil palm for third cycle.</p> | Complied |
| <p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p> | | | |
| 4.8.1 | <p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -</p> | <p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p> | Complied |
| 4.8.2 | <p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties</p> | <p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities.</p> | Complied |

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| | involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance - | Boundary stone and trenches were available to demarcate the boundary of land. | |
| 4.8.3 | Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance - | No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land. | Complied |
| 4.8.4 | For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance - | No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land. | Complied |
| Principle 5: Support smallholder inclusion | | | |
| Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses. | | | |
| 5.1.1 | Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance - | Current and previous FFB prices available as per MPOB Daily FFB Reference Price Summary by Region. The mill received FFB from sister estate within SOU 24 and FFB diversion from other certified SOU. The FFB supplier were listed in the Hadapan POM FFB Supplier list. There are 11 Outside Crop Producer (OCP) have been registered under Hadapan POM. For year 2022 only 2 OCP that been send the crop into Hadapan with total 38658.41 mt FFB. | Complied |

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| 5.1.2 | <p>(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p> | <p>The mill has last explained the third party FFB suppliers about the FFB pricing in a meeting with Outside Crop Producer (OCP) on 20/05/2022. Minutes of meeting were available for verification. All of the suppliers attended the meeting i.e. FELCRA Bhd, Bukit Siput Resources Sdn Bhd, Pertubuhan Peladang Kawasan Rengit and VR Plantation. The others were absent with apology.</p> | Complied |
| 5.1.3 | <p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p> | <p>Fair pricing is calculated as a portion of the international CPO price less costs is provided to the third party FFB suppliers. The following contracts were sampled for verification:</p> <p>BXXXX Sdn Bhd, agreement no. P/P/1221/FFB03426L, validity 01/01-31/12/2022</p> <p>AXXXXX Sdn Bhd, agreement no. P/P/1221/FFB03423L, validity 01/01-31/12/2022</p> | Complied |
| 5.1.4 | <p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p> | <p>Not applicable as no smallholder is supplying FFB directly to the mill.</p> | Not Applicable |
| 5.1.5 | <p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p> | <p>The mill received FFB from sister estate from SOU 20 and FFB diversion from other certified SOU. Contracts are found to be fair, legal and transparent and have an agreed timeframe. The following contracts were sampled for verification:</p> <p>BXXXX Sdn Bhd, agreement no. P/P/1221/FFB03426L, validity 01/01-31/12/2022</p> <p>AXXXXX Sdn Bhd, agreement no. P/P/1221/FFB03423L, validity 01/01-31/12/2022</p> | Complied |

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| 5.1.6 | <p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -</p> | <p>The mill received FFB from other Sime Darby Plantation operating unit and FFB diversion from other certified SOU. The FFB supplier were listed in the Hadapan POM FFB Supplier list included OCP. Sampled payment as per record;- VXXX Sdn Bhd invoice created on 09/08/2022 and the payment was on 15/08/2022 referred P/ADVCH-018615 with total payment RM 250,976.33.</p> | Complied |
| 5.1.7 | <p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -</p> | <p>Weighbridge calibration conducted on 30/06/2022 by Metrology Corporation Malaysia Sdn Bhd. Sighted calibration serial # B1742877 (Siri:195050377) – 80,000kg and B1742876 (Siri:52940181) - 60,000kg.</p> | Complied |
| 5.1.8 | <p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -</p> | <p>Not applicable as no smallholder is supplying FFB directly to the mill.</p> | Not Applicable |
| 5.1.9 | <p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -</p> | <p>Addressed in Standard Operation Manual; Date: 1/11/2008 that documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2) for grievance handling. No independent smallholders within Hadapan POM certification unit.</p> | Complied |
| <p>Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p> | | | |
| 5.2.1 | <p>The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -</p> | <p>Not applicable as no smallholder is supplying FFB directly to the mill.</p> | Not Applicable |

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| 5.2.2 | The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance - | Not applicable as no smallholder is supplying FFB directly to the mill. | Not Applicable |
| 5.2.3 | Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance - | Not applicable as no smallholder is supplying FFB directly to the mill. | Not Applicable |
| 5.2.4 | (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance - | Not applicable as no smallholder is supplying FFB directly to the mill. | Not Applicable |
| 5.2.5 | The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance - | Not applicable as no smallholder is supplying FFB directly to the mill. | Not Applicable |
| Principle 6: Respect workers' rights and conditions | | | |
| Criterion 6.1: Any form of discrimination is prohibited. | | | |
| 6.1.1 | (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance - | Sime Darby Plantations established Human Rights Charter. The charter has no changes and it describes on ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at work and providing a platform for workers' voice and social dialogue. They respect the rights of workers and provide fair and favorable working conditions by Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union | Complied |

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| | | <p>membership, political affiliation or age.</p> <p>They will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy could be downloaded from https://simedarbyplantation.com/sustainability/reports-policies-and-statements/</p> <p>Example</p> <p>Kulai Estate conduct briefing on social dialogue 5th and ILO (SD Reinforce) to workers on 08/03/2022.</p> | |
| 6.1.2 | <p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p> | <p>Onsite interviewed with the workers comprises of different gender and nationalities confirmed that no discrimination has reported.</p> <p>The management treated all equally such as provided free accommodation and medical to all the workers, no charging of recruitment fees for the foreign workers and offered job based on capability. The worker can request for job transfer if they found they unfit for the job assigned to them.</p> | Complied |
| 6.1.3 | <p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p> | <p>Sime Darby Plantations established Career Progression for Workers Level (both local and foreign workers), Doc. No.: SDP/HRUM/2020/SOP01. The document has no changes and it objectives on promotion of workers is based on the work performance, suitability, and the leadership quality of the worker. The recruitment of foreign workers is through Workers Management Unit based in HQ.</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>Onsite interviewed female employees in Hadapan Palm Oil Mill and sample group estates informed pregnancy testing is not conducted prior to work. The workers also mention that pregnant women will be offered alternative equivalent employment if they are pregnant.</p> | Complied |

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| <p>6.1.5</p> | <p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p> | <p>Sime Darby Plantations established Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organization and ensuring their protection. The policy has no changes and it been communicated through the Gender Committee meeting conducted quarterly.</p> <p>Sime Darby Plantations established the new Terms of Reference (TOR) for Gender Representatives and Gender Committee, dated March 2021 which supersede the previous Gender Committees Gender Committee Handbook, First Edition 2014. The document has no changes since then and objective to give more definitive roles, and responsibilities as well as governance structure and programmes were added in.</p> <p>Gender Committee were established by the mill and estates management and verified at each operating unit. Meetings to be conducted once every 2 months or whenever necessary according to the new TOR.</p> <p>Meetings conducted at respective units as below:</p> <ol style="list-style-type: none"> 1. CEP Rengam Estate: 23/09/2022 2. Kulai – 18/06/2022, 23/09/2022 3. Hadapan POM – 07/01/2022, 11/03/2022, 24/06/2022, 23/09/2022, 25/11/2022 4. Layang Estate – 12/02/2022, 13/08/2022, 12/11/2022, 5. CEP Rengam Estate – 21/9/2022, 24/03/2022 6. Seri Pulai Estate – 12/08/2022, 23/11/2022 <p>There was no sexual harassment case reported so far at all OUs.</p> <p>Sime Darby Plantations established new Terms of Reference (TOR) for Gender Representatives and Gender Committee, dated March 2021 which supersede the previous Gender Committees Gender</p> | <p>Complied</p> |
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| | | <p>Committee Handbook, First Edition 2014. In this new TOR, a more definitive roles, and responsibilities as well as governance structure and programmes were added in.</p> <p>Kulai Estate conduct briefing on sexual harassment to workers on 11/03/2022, 31/03/2022 and 25/06/2022.</p> | |
| 6.1.6 | <p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p> | <p>There is no discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting. Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste Example foreign workers ID#169861 who has been newly employed by Kulai Estate on 28/08/2022 confirmed that process of hiring of foreign workers is implemented according to regulation based on suitability and nature of job offered.</p> | Complied |
| <p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p> | | | |
| 6.2.1 | <p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p> | <p>Sime Darby Plantations has signed the Collective Agreement with National Union of Plantation Workers (NUPW). Sample of employment contracts are reviewed, and the agreements are signed in both English and home country language (i.e. Hindi, Bahasa Malaysia/Indonesia) was align with MAPA Circular No. 4/2020; The Malayan Agricultural Producers Association; Date: 30/01/2020; MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2019. Upon the foreign workers arriving to the estate, they will be inducted for the terms and conditions of employment contract and briefed on the company’s policies. This has confirmed by interviewed with the foreign workers.</p> | Complied |

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| <p>6.2.2</p> | <p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p> | <p>Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. The terms are following the Employment Act 1955, Minimum Wages Order 2020, SOCSO Act 1969, EPF Act 1991, EIS Act 2017, and the MAPA/NUPW agreement.</p> <p>Payroll documents, namely the payslip, also give accurate information on compensation for all work done. This includes those who receive daily-rated wages, piece rated wages, payment for any overtime work done, and public holiday pay. Also confirmed via sampled payslips that wages were paid in compliance with national legal requirements. Salary deductions and overtime were in accordance with the relevant laws (SOCSO, EPF, EIS) and Labour Office permits. None of the sampled workers had any family members performing work.</p> <ol style="list-style-type: none"> 1. Employment contracts template, 'Employment Contract Extension for Foreign Worker (Peninsular – Indonesia/ Nepalese) – ECE1 2. Check-roll records, Estate/mill daily attendance report, CKRRD005 3. Employee Master List, SEMUA report. <p>Approval for overtime limit extension to 130 hours has been obtained from Labour Department, Putrajaya. Ref:(30) dlm Bhg PU/9/134 Jilid 2 dated 2/12/2013. As for salary deduction permit, blanket approval ref: (25). PTKJB/10101/55563(PMT) dated 18/1/12 was made available for verification.</p> <p>Example briefing to Kulai Estate.</p> | <p>Complied</p> |
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| | | <ol style="list-style-type: none"> 1. Briefing on payslip to workers on 15/06/2022 and 29/09/2022. 2. Briefing on new minimum wages / wages calculation on 14/01/2022 and 25/07/2022. 3. Briefing on workers satisfaction survey for Kelan Division on 06/07/2022. – Document review on workers survey sighted feedback of not comfortable used safety helmet (Alpine Pro) with latest December 2022. 4. Briefing on MAPA collective agreement to workers on 12/05/2022. <p>Briefing on VLP, annual leave and 'No work on Consecutive Sundays' on 28/03/2022.</p> | | | | | | | | | |
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| 6.2.3 | <p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p> | <p>Based on review of punch cards, workers' employment contracts and payslips, there is evidence was available that Hadapan POM and its supply base were able to demonstrate compliance with Employment Contracts 1955 related to regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>There is no change in term of the statement of conformity when comparing from the previous audit result. Up to now since previous assessment last year till the date of this audit, statutory deductions are still applicable. Sampled during the audit were the following workers' employment contracts and payslips for the month of August 2021 (peak), February 2021 (low) and May 2021 (average/medium)</p> <p><u>Kulai Estate (11 workers sampled from total of 125 workers)</u></p> <table border="1" data-bbox="1137 1310 1928 1390"> <thead> <tr> <th data-bbox="1137 1310 1337 1390">Employee ID</th> <th data-bbox="1337 1310 1532 1390">Joined date</th> <th data-bbox="1532 1310 1733 1390">Job task</th> <th data-bbox="1733 1310 1928 1390">Passport / IC No.</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> | Employee ID | Joined date | Job task | Passport / IC No. | | | | | Complied |
| Employee ID | Joined date | Job task | Passport / IC No. | | | | | | | | |
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| | | 169105 | 25/04/2022 | General workers | 880414-xx-xxxx |
| | | 16968 | 23/01/2009 | Harvesting Mandore | 641006-xx-xxxx |
| | | 120049 | 04/03/2016 | OP Agrmnt | 0923xxxx |
| | | 143051 | 01/06/2018 | General workers | 0667xxxx |
| | | 169861 | 28/08/2022 | OP Harvester | C640xxxx |
| | | 126443 | 03/09/2019 | OP Harvester | AU57xxxx |
| | | 154016 | 17/10/2016 | OP Agrmnt | C732xxxx |
| | | 118186 | 06/11/2015 | OP Agrment | BL032xxxx |
| | | 162934 | 01/12/2018 | General Worker | EE003xxxx |
| | | 58988 | 05/12/2016 | General Worker | P625xxxx |
| | | 146140 | 10/10/2018 | OP Agrmnt | M255xxxx |
| Hadapan POM (11 workers sampled from total of 114 workers) | | | | | |
| | | Employee ID | Joined date | Job task | Passport / IC No. |
| | | 157612 | 15/01/2020 | Press Operator | B578xxxx |
| | | 134198 | 09/06/2017 | Kernel Operator | AT88xxxx |

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| | | 164957 | 01/09/2021 | Electrical Helper | 011115-xx-xxxx |
| | | 139368 | 24/01/2018 | Kernel Operator | AU04xxxx |
| | | 17622 | 03/11/2008 | Water Treatment Operator | 020214-xx-xxxx |
| | | 164110 | 12/07/2021 | Press Operator | 850523-xx-xxxx |
| | | 165518 | 12/10/2021 | Gardener | 940904-xx-xxxx |
| | | 168513 | 05/04/2022 | Lab Operator | 970731-xx-xxxx |
| | | 170631 | 08/08/2022 | Gardener | 840110-xx-xxxx |
| | | 167920 | 03/03/2022 | Workshop | 890516-xx-xxxx |
| | | 164686 | 12/08/2021 | Fireman Boiler | 870728-xx-xxxx |
| <u>Layang Estate (11 workers sampled from total of 192 workers)</u> | | | | | |
| | | Employee ID | Joined date | Job task | Passport / IC No. |
| | | 125451 | 13/09/2016 | Field Worker | N666xxxx |
| | | 105169 | 11/09/2014 | GW | 0719xxxx |

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| | | 109205 | 12/12/2014 | GW | 0712xxxx |
| | | 143084 | 01/06/2018 | Field Worker | M310xxxx |
| | | 88907 | 22/03/2013 | Harvesting Mandore | AS41xxxx |
| | | 118539 | 02/03/2015 | FronD Stacker | AT29xxxx |
| | | 133771 | 25/05/2017 | Field Worker | AT94xxxx |
| | | 140051 | 09/02/2018 | Field Worker | AU15xxxx |
| | | 47725 | 01/05/2010 | GW | 660506-xx- xxxx |
| | | 94119 | 03/08/2013 | GW | 850421-xx- xxxx |
| | | 159272 | 02/10/2017 | Clerk | 920628-xx- xxxx |
| <u>Seri Pulai Estate (10 workers sampled from total of 97 workers)</u> | | | | | |
| | | Employee ID | Joined date | Job task | Passport / IC No. |
| | | 125312 | 19/12/2012 | Harvester | C656xxxx |
| | | 104711 | 23/08/2014 | Harvester | 0702xxxx |
| | | 109066 | 10/12/2014 | General Workers | EJ084xxxxx |
| | | 118225 | 04/11/2015 | | EG084xxxx |
| | | 170109 | 15/03/2019 | Tractor Driver | C883xxxx |

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| | | 173407 | 15/11/2022 | Harvester | E035xxxx |
| | | 173411 | 15/11/2022 | Harvester | E034xxxx |
| | | 140051 | 28/11/2022 | Harvester | C793xxxx |
| | | 173807 | 29/11/2022 | Harvester | E059xxxx |
| Sampled Payslip for Seri Pulai Estate for November 2022: | | | | | |
| | Employee ID: | 104711 | 170109 | 109066 | |
| | Passport / IC No.: | 0702xxxx | C883xxxx | EJ084xxxx | |
| | Originality | Nepal | Indonesian | Bangladesh | |
| | Job Task: | Harvester | Tractor Driver | General Worker | |
| | Day Rate /Piece Rate | MYR57.69 (Daily Rated) MYR145.81 (Piece Rate) | MYR57.69 (Daily Rated) MYR109.35 (Piece Rate) | MYR57.96 (Daily Rated) MYR140.30 (Piece Rate) | |
| | Day of Work | 23days | 25days | 26days | |
| | Overtime | (Normal-10hours) | (Normal-37hours) | (Normal-46hours) | |
| | Deduction | MYR137.76 (Income Tax, Electrical, Union) | MYR23.10 (Electrical) | MYR130.99 (Income Tax, Electrical, Union) | |
| | Employer Contribution | MYR55.60 (SOCSCO) | MR48.10 (SOCSCO) | MYR54.40 (SOCSCO) | |

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| <p>6.2.4</p> | <p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of 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>The basic amenities and facilities at the quarters provided by the company to the workers includes electricity, water and domestic waste disposal. Electricity were supplied by government and deducted from salary and for water, SDP provide free water up to 35 gallons per employee per day. Only Additional use will be charged to workers based on applicable domestic rates. Seen the budget for housing repairs, sanitation, garden upkeep and CAPEX & OPEX from all operating units. Seen the record for weekly line site inspection done by Medical Assistant (estate) and QA (mill) in fortnightly basis as per the new Workers Minimum Housing and Amenities Regulation 2020. Inspection records checked:</p> <table border="1" data-bbox="1137 734 1937 1209"> <thead> <tr> <th>No.</th> <th>Operating Units</th> <th>Linesite inspection</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>CEP Rengam Estate</td> <td>09/12/2022, 02/12/2022, 25/11/2022, 18/11/2022</td> </tr> <tr> <td>2</td> <td>Kulai Estate</td> <td>12/12/2022, 05/12/2022, 28/11/2022, 21/11/2022</td> </tr> <tr> <td>3</td> <td>Hadapan POM</td> <td>08/12/2022, 01/12/2022, 24/11/2022, 17/11/2022</td> </tr> <tr> <td>4</td> <td>Layang Estate</td> <td>09/12/2022, 01/12/2022, 23/11/2022, 17/11/2022</td> </tr> <tr> <td>5</td> <td>Seri Pulai Estate</td> <td>15/12/2022, 09/12/2022, 02/12/2022, 25/11/2022</td> </tr> </tbody> </table> <table border="1" data-bbox="1137 1257 1937 1335"> <thead> <tr> <th>No.</th> <th>Operating Units</th> <th>Date of VMO visit</th> </tr> </thead> <tbody> </tbody> </table> | No. | Operating Units | Linesite inspection | 1 | CEP Rengam Estate | 09/12/2022, 02/12/2022, 25/11/2022, 18/11/2022 | 2 | Kulai Estate | 12/12/2022, 05/12/2022, 28/11/2022, 21/11/2022 | 3 | Hadapan POM | 08/12/2022, 01/12/2022, 24/11/2022, 17/11/2022 | 4 | Layang Estate | 09/12/2022, 01/12/2022, 23/11/2022, 17/11/2022 | 5 | Seri Pulai Estate | 15/12/2022, 09/12/2022, 02/12/2022, 25/11/2022 | No. | Operating Units | Date of VMO visit | <p>Complied</p> |
|--------------|--|--|-----|-----------------|---------------------|---|-------------------|--|---|--------------|--|---|-------------|--|---|---------------|--|---|-------------------|--|-----|-----------------|-------------------|-----------------|
| No. | Operating Units | Linesite inspection | | | | | | | | | | | | | | | | | | | | | | |
| 1 | CEP Rengam Estate | 09/12/2022, 02/12/2022, 25/11/2022, 18/11/2022 | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Kulai Estate | 12/12/2022, 05/12/2022, 28/11/2022, 21/11/2022 | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Hadapan POM | 08/12/2022, 01/12/2022, 24/11/2022, 17/11/2022 | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Layang Estate | 09/12/2022, 01/12/2022, 23/11/2022, 17/11/2022 | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Seri Pulai Estate | 15/12/2022, 09/12/2022, 02/12/2022, 25/11/2022 | | | | | | | | | | | | | | | | | | | | | | |
| No. | Operating Units | Date of VMO visit | | | | | | | | | | | | | | | | | | | | | | |

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|-------|---|---|----------|-------------------|------------------------|---|--------------|------------------------|---|-------------|------------------------|---|---------------|------------------------|---|-------------------|------------------------|--|
| | | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%; text-align: center;">1</td> <td style="width: 35%;">CEP Rengam Estate</td> <td style="width: 60%;">09/12/2022, 25/11/2022</td> </tr> <tr> <td style="text-align: center;">2</td> <td>Kulai Estate</td> <td>20/12/2022, 13/12/2022</td> </tr> <tr> <td style="text-align: center;">3</td> <td>Hadapan POM</td> <td>08/12/2022, 24/11/2022</td> </tr> <tr> <td style="text-align: center;">4</td> <td>Layang Estate</td> <td>09/12/2022, 23/11/2022</td> </tr> <tr> <td style="text-align: center;">5</td> <td>Seri Pulai Estate</td> <td>15/12/2022, 02/12/2022</td> </tr> </table> <p>Workers Housing Management Procedure and 'OilPalmPal' Digital Housing Complaint System (OPP DHCS). Inter-office mail (Ref. No: UM/HSE/013/11/2021), dated 26/11/2021 from CEO Upstream Malaysia. General house rule is written under "Peraturan Umum Kompleks Perumahan Pekerja"</p> <p>For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2 people per room. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utensils).</p> <p>Kulai Estate conduct briefing on housing hygiene to workers on 13/04/2022, 07/06/2022 and 28/07/2022.</p> | 1 | CEP Rengam Estate | 09/12/2022, 25/11/2022 | 2 | Kulai Estate | 20/12/2022, 13/12/2022 | 3 | Hadapan POM | 08/12/2022, 24/11/2022 | 4 | Layang Estate | 09/12/2022, 23/11/2022 | 5 | Seri Pulai Estate | 15/12/2022, 02/12/2022 | |
| 1 | CEP Rengam Estate | 09/12/2022, 25/11/2022 | | | | | | | | | | | | | | | | |
| 2 | Kulai Estate | 20/12/2022, 13/12/2022 | | | | | | | | | | | | | | | | |
| 3 | Hadapan POM | 08/12/2022, 24/11/2022 | | | | | | | | | | | | | | | | |
| 4 | Layang Estate | 09/12/2022, 23/11/2022 | | | | | | | | | | | | | | | | |
| 5 | Seri Pulai Estate | 15/12/2022, 02/12/2022 | | | | | | | | | | | | | | | | |
| 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>There were sundry shops located in the estates compound and the estates are nearby to the nearest town. The workers can easily access to adequate, sufficient and affordable foods and goods.</p> | Complied | | | | | | | | | | | | | | | |
| 6.2.6 | <p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> | <p>Sime Darby Plantations has provided the decent living wage for both local and foreign workers based on PREVAILING WAGES assessment. It includes wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc.</p> | Complied | | | | | | | | | | | | | | | |

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| <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place,</i></p> | <p>During document review onsite for particular payslip as sighted in indicator 6.2.1 verified that the salary received complied with the minimum wage order 2021 and the decent living wage set up by the group which is foreign worker is RM1891.17/worker and local RM2009.12/worker. The differences between foreign worker and local based on the actual data generated from SOU 24 Hadapan POM and it supply based and also based on MAPA Circular No. 4/2020; The Malayan Agricultural Producers Association; Date: 30/01/2020; MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2019.</p> <p>Note: Until housing basket can be determine (work in progress-data type need to pull from various departments and further segregated), in the interim Sime Darby Plantation will refer to CA amount of RM125.</p> | |
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| | <p><i>national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage). The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p> | | |
| 6.2.7 | <p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p> | <p>There are no casual workers hired in Hadapan Palm Oil Mill and its supply bases. All employees are permanent employee (for locals) and contracted employee (for foreign workers). All permanent and full-time employment or contract workers used as the general worker, mandore, staff, etc. based on their employment contract sighted in clause 6.2.2.</p> | Complied |

| Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel. | | | | | | | | |
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| 6.3.1 | <p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p> | <p>Sime Darby Plantations established Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019. The policy has no changes and its includes as below: We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ol style="list-style-type: none"> 1. Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. 2. Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. 3. Company respects the rights of all personnel to form and join trade unions of their choice to bargain collectively. <p>Onsite interview workers informed no restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union.</p> <p style="text-align: right;">Complied</p> | | | | | | |
| 6.3.2 | <p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p> | <p>Trade union meeting carried out at each respected operating unit were verified. The meeting involved the representative from employer and employee. Date of meetings summarized as per below:</p> <table border="1" data-bbox="1137 1197 1944 1359"> <thead> <tr> <th>Estate / Mill</th> <th>Date of meeting</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>CEP Rengam Estate</td> <td>10/12/2022</td> <td>Issues discuss include on collective agreement, new wages,</td> </tr> </tbody> </table> <p style="text-align: right;">Complied</p> | Estate / Mill | Date of meeting | Remarks | CEP Rengam Estate | 10/12/2022 | Issues discuss include on collective agreement, new wages, |
| Estate / Mill | Date of meeting | Remarks | | | | | | |
| CEP Rengam Estate | 10/12/2022 | Issues discuss include on collective agreement, new wages, | | | | | | |

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| | | | | entrepreneurship offer and 'pasar malam' reopen for workers. | |
| | | Kulai Estate | 02/12/2022 | Issues discuss include on housing maintenance, briefing on complaints procedure and social dialogue as platform to raised matter related wot work. | |
| | | Hadapan Palm Oil Mill | 31/102/022 | Issues discuss include on outstanding for special allowance categorized as hot allowance for employee work at boiler and steriliser area. | |
| | | Layang Estate | 08/11/2022 | Issued discuss include on safety and health, workers rights and requirement of workers to follow. | |
| | | Seri Pulau Estate | 02/08/2022 | Issued discuss include sanitation, workers housing, field signage and cow encroachment. | |
| 6.3.3 | 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. - Minor compliance - | Onsite interview worker inform selection of NUPW representative made from the election among the NUPW member without management interference. Foreign workers included in the committee formation and appointment letter sighted. The selection also based on the election meeting. | | | Complied |
| Criterion 6.4: Children are not employed or exploited. | | | | | |
| 6.4.1 | 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. | Sime Darby Plantations established Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 has no changes. | | | Complied |

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| | <p>- Minor compliance -</p> | <p>The policy includes as follow:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <p>Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</p> <ol style="list-style-type: none"> 1. Respecting Freedom of Association: We respect the rights of employees to join and form organizations of their own choice and to bargain collectively. 2. Ensuring Favorable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations. 3. Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the wellbeing of our communities. 4. Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognize that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use. 5. Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalized groups, persons of different abilities and refugees. 6. Protecting the Rights of Children: We seek to promote the wellbeing of children and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography. <p>Field observation, interviewing with workers and verification of</p> | |
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| | | workers master list confirmed that there is no child labour hired. For contractors, the clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC dated 21/06/2020, Human Rights Charter-protecting the rights of children. | |
| 6.4.2 | (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance - | There is no change on SOP Hiring of locals dated 01/11/2019 in which it has been seen and reported in the public summary report last year whereby the assistant operating unit while for foreign workers, the Workforce Management Unit Liason & Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old). | Complied |
| 6.4.3 | (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance - | There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Employee Master Listing and through interviewed with the stakeholders at the time of the audit | Complied |
| 6.4.4 | The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance - | The management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders. For example, Human Right Charter briefing was given on 23/09/2022 at CEP Renggam estate. | Complied |
| Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected. | | | |
| 6.5.1 | (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance - | Sime Darby Plantations established Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019. The policy has no changes, and it includes as below: We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to: 1. Eliminating Violence and Sexual Harassment: We seek to | Complied |

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| | | <p>promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims.</p> <p>2. Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation.</p> <p>The policy was communicated through the Gender Committee meeting</p> | |
| 6.5.2 | <p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p> | <p>Sime Darby Plantations established Social Policy, Gender Policy and Social & Humanity Management Policy dated January 2015. The policies have no changes and the objectives of the policies describes management commitment to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights.</p> <p>The company also establish the Human Right Charter revised 2020 where under 3.2.5 Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. We will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights.</p> <p>The policy was displayed on the notice board which was accessible by the workers. Briefing of the policies was conducted during morning muster and the policies was displayed at the notice board outside the office.</p> | Complied |
| 6.5.3 | <p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p> | <p>Sime Darby Plantations conduct assessment for new needs for new mother was conducted by Gender Committee. There were new needs as sampled below:</p> <p><u>Kulai Estate</u></p> | Complied |

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| | | <p>20/05/2022: There is one new mother (Pn. Noryana Bnti Sumberi) in the estate, with three (3) months maternity leave.</p> <p><u>Layang Estate</u></p> <p>01/12/2022: There is one new mother (Pn. Nur Falsha Bt Hamid) in the estate, with three (3) months maternity leave.</p> | |
| 6.5.4 | <p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p> | <p>Sime Darby Plantations established Gender Committee Handbook, First Edition 2014. The handbook has no changes and objectives to implementation framework and guidelines where grievance reporting procedure for gender was developed. The new Term of Reference for Gender Representative and Gender Committee dated March 2021 has been introduced to improve on the implementation of gender related activities in Sime Darby Plantation.</p> <p>The Incident report template was established under Flowchart and Procedure on Handling Social Issues, version 1, dated 01/11/2008 was implemented as well. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in http://www.simedarbyplantation.com/corporate/governance/whistleblowing.</p> <p>Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p> | Complied |

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| | | <p>SOU 24 CEP Rengam conduct SOU Level Gender committee meeting on 23/09/2022 includes agenda of briefing on company policy and charter Sime Darby Plantation, committee responsibilities, commitment women rights, reproductive rights, sexual harassment, committee activity and procedure.</p> <p>Each individual estate conduct gender committee meeting.</p> <p>Example, Kulai Estate conduct gender committee meeting with minutes recorded on 07/12/2022, 23/09/2022, 04/06/2022, 09/03/2022 and 10/12/2021</p> | |
| <p>Criterion 6.6: No forms of forced or trafficked labour are used.</p> | | | |
| <p>6.6.1</p> | <p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p> | <p>Onsite interviewed workers informed that no forced and trafficked labour in SOU24.</p> <p>The Indian workers informed that they did not pay any recruitment fee to agent as they employed directly by Sime Darby Plantations. The terms and conditions offered by the company were similar in their home country and when arrived in the plantations. No contract substitution has occurred. The workers keep their own passport. Overtimes was monitored by the company and the workers are giving freedom to choose to overtime and resign. There was no penalty for termination of employment if they wish to terminate the contract earlier as per the employment contract signed.</p> <p>If the workers in the mill who want to work for overtime, they will need to fill in the Overtime Details form. Those who worked on rest day and public holiday is required to fill in the application form Kerja/ Kerja lebih masa pada hari rehat & Kerja/ kerja lebih masa pada hari cuti am. Approval from the Supervisor and Assistant is required.</p> | <p>Complied</p> |

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| | | <p>Example: Kulai Estate conduct briefing on passport and steel cabinet to workers on 19/09/2022.</p> | |
| <p>6.6.2</p> | <p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented. - Critical (Major) compliance -</p> | <p>Sime Darby Plantations established Human Rights Charter revised 2020. The charter has no changes, and it can be easily access via www.simedarbyplantation.com where they committed as below:</p> <ol style="list-style-type: none"> 1. Providing equal opportunity 2. Respecting freedom of association 3. Eradicating any form of exploitation <ol style="list-style-type: none"> a. Providing decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs 4. Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution. <p>All the foreign workers will be provided with induction training prior to work. Besides, they were provided with decent living condition and free from any discrimination. The workers informed that they were treated equally without any discrimination and allow joining NUPW freely. No contract substitution has occurred through interviewed with the workers.</p> <p>They also provided awareness and training to all the foreign workers for them to understand their responsibility in respect of human rights as included in the Group Sustainability Policy on 19/12/2022 at Kulai Estate and 22/11/2022 at Seri Pulai Estate.</p> | <p>Complied</p> |
| <p>Criterion 6.7: 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>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - | <p>Both the estates and mill management conduct regular two-way communication with their employees through the quarterly OSH committee meeting. Among the agenda discussed are:</p> <ul style="list-style-type: none"> - Confirmation of minutes previous meeting - Workplace inspection report - Accident report - Medical surveillance & Audio metric - Status of Safety Program & Environmental - First Aid Kit & Fire Extinguishers Report - HIRARC - Complaint from Employee/External Party. - Other matters <p>Workplace inspections are made prior to the ESH meeting. The respective Managers were appointed as ESH Chairman (PIC) through letter signed by Regional General Manager. All letters were made available for verification.</p> <p>In CEP Renggam Estate, the appointment letter was available for chairman (Mr Mohd Mahyudin) as per letter dated 01/01/2021. The OSH meeting conducted by quarterly basis, the record sighted date on 15/11/2022. Previously record was on 22/09/2022 and 30/6/2022. The latest workplace inspection conducted on 14/08/2022 and this cover overall workplace inspection included spraying, manuring, store, office and others.</p> <p>In Kulai Estate, the appointment letter was available for chairman (Mr Amir Hassan) as per letter dated 31/12/2021. The OSH meeting conducted by quarterly basis, the record sighted date on 10/11/2022. Previously record was on 18/08/2022 and 16/05/2022. The latest workplace inspection conducted on 14/10/2022 and this cover overall workplace inspection included spraying, manuring, store, office and others.</p> | Complied |
|-------|---|---|----------|

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| | | <p>Layang estate, the OSH committee have been established by the management, the chairman for OSH committee was a estate manager. Appointed by Regional General Manager (Johore South), Southern Region dated 01/12/2022. OSH meeting conducted quarterly basis and record was available dated 25/11/2022. Previously record was on 26/8/2022 and 20/5/2022.</p> | |
| <p>6.7.2</p> | <p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p> | <p>Accident & emergency procedures were available. Each estate management has formed the ERP team and the organization chart was displayed on notice board for information of the employees. During the interview, the employees can demonstrate a good understanding regarding on the ERP procedure and plan. Record of JKPP or accident record was available as per sample below;_</p> <p>Hadapan POM</p> <p>JKPP 8/105777/2021 send on 25/1/2022 with total 2 accident record.</p> <p>CEP Renggam Estate</p> <p>JKPP 8/100657/2021 send on 13/01/2022 with total 5 accident record with total 57 lost time injury.</p> <p>Kulai Estate</p> <p>JKPP 8/91283/2021 send on 17/01/2022 with total 5 accident record with total 56 lost time injury</p> <p>Layang Estate</p> <p>JKPP 8/102472/2021 send on 17/01/2022 with total 1 accident record.</p> <p>Employees who were trained in First Aid were present at all station visited. The first aid box equipped with approved contents and in accordance with 4th schedule for first aid guidelines.</p> | <p>Complied</p> |

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| <p>6.7.3</p> | <p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p> | <p>The management provides appropriate PPE to the employees in accordance with HIRARC and Standard Operating Procedure. PPE issuance records were well maintained and made available for verification. Among the information available in the record was name of employee, type of PPE (i.e. apron, safety shoes, rubber boots, N95 mask, respirator, cartridge, helmet, goggle, cotton gloves, nitrile gloves, etc.), date of PPE received and receipt acknowledgement by the recipient. On site verification and interview with workers showed that the appropriate PPE was provided for free and worn accordingly. Sampling on Manuring PPE record in Kulai estate as per below:-</p> <table border="1" data-bbox="1137 715 1928 885"> <thead> <tr> <th>Name</th> <th>Type of PPE</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Eko Susanio</td> <td>Cotton Glove</td> <td>12/12/2020</td> </tr> <tr> <td rowspan="3">Farhan</td> <td>Ear plug</td> <td rowspan="3">24/11/2022</td> </tr> <tr> <td>respirator</td> </tr> <tr> <td>Apron</td> </tr> </tbody> </table> <p>In Layang Estate</p> <table border="1" data-bbox="1137 954 1928 1125"> <thead> <tr> <th>Name</th> <th>Type of PPE</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Zurizam</td> <td>Yellow Rubber Boot</td> <td>17/05/2022</td> </tr> <tr> <td>Cotton glove</td> <td>01/06/2022</td> </tr> <tr> <td rowspan="2">Ansari</td> <td>Ear plug</td> <td rowspan="2">2/3/2022</td> </tr> <tr> <td>Nitril glove</td> </tr> </tbody> </table> <p>Sanitation facilities such as shower room, PPE washing area, personal clothing locker for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing were provided and well maintained.</p> <p>Training to the employees exposed to the chemical was properly conducted. The training records were made available and sighted.</p> | Name | Type of PPE | Date | Eko Susanio | Cotton Glove | 12/12/2020 | Farhan | Ear plug | 24/11/2022 | respirator | Apron | Name | Type of PPE | Date | Zurizam | Yellow Rubber Boot | 17/05/2022 | Cotton glove | 01/06/2022 | Ansari | Ear plug | 2/3/2022 | Nitril glove | <p>Complied</p> |
|--------------|---|---|------|-------------|------|-------------|--------------|------------|--------|----------|------------|------------|-------|------|-------------|------|---------|--------------------|------------|--------------|------------|--------|----------|----------|--------------|-----------------|
| Name | Type of PPE | Date | | | | | | | | | | | | | | | | | | | | | | | | |
| Eko Susanio | Cotton Glove | 12/12/2020 | | | | | | | | | | | | | | | | | | | | | | | | |
| Farhan | Ear plug | 24/11/2022 | | | | | | | | | | | | | | | | | | | | | | | | |
| | respirator | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Apron | | | | | | | | | | | | | | | | | | | | | | | | | |
| Name | Type of PPE | Date | | | | | | | | | | | | | | | | | | | | | | | | |
| Zurizam | Yellow Rubber Boot | 17/05/2022 | | | | | | | | | | | | | | | | | | | | | | | | |
| | Cotton glove | 01/06/2022 | | | | | | | | | | | | | | | | | | | | | | | | |
| Ansari | Ear plug | 2/3/2022 | | | | | | | | | | | | | | | | | | | | | | | | |
| | Nitril glove | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <ul style="list-style-type: none"> • Safe Working Procedure: Chemical Usage, conducted on 17/11/2021 • Safe Working Procedure: Chemical Store, conducted on 29/05/2021. | | | | | | | | | | | | | | | | | | | |
|--------------------|--|--|----------------|---------------|-----------------|-------------|-----|-----|--------------------|-------|------|--------------|-------|-------|---------------|-------|-------|-------------------|-------|-------|----------|
| 6.7.4 | <p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p> | <p>Should there be any medical care needed by the employees, clinics with certified Medical or Hospital Assistants in-charge were provided at all the sampled management units. Based on site visits, all the clinics were well maintained and managed. Records of medical inventory, VMO visits and patients treated were made available for verification.</p> <p>The sampled estates and mill are subscribing to SOCSO to cover the accident insurance for all their workers. Payment vouchers to SOCSO were made available for verification by all the operating units.</p> | Complied | | | | | | | | | | | | | | | | | | |
| 6.7.5 | <p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p> | <p>Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKKP 8. Records are kept for a minimum 10 years in the office. Crosschecking with RSPO metrics template showed that the data was appropriately recorded.</p> <table border="1"> <thead> <tr> <th>Operating Unit</th> <th>Incident rate</th> <th>Likelihood rate</th> </tr> </thead> <tbody> <tr> <td>Hadapan Pom</td> <td>0.0</td> <td>0.0</td> </tr> <tr> <td>CEP Renggam estate</td> <td>21.46</td> <td>8.94</td> </tr> <tr> <td>Kulai estate</td> <td>56.96</td> <td>23.73</td> </tr> <tr> <td>Layang estate</td> <td>33.02</td> <td>13.76</td> </tr> <tr> <td>Seri Pulai estate</td> <td>31.01</td> <td>12.22</td> </tr> </tbody> </table> | Operating Unit | Incident rate | Likelihood rate | Hadapan Pom | 0.0 | 0.0 | CEP Renggam estate | 21.46 | 8.94 | Kulai estate | 56.96 | 23.73 | Layang estate | 33.02 | 13.76 | Seri Pulai estate | 31.01 | 12.22 | Complied |
| Operating Unit | Incident rate | Likelihood rate | | | | | | | | | | | | | | | | | | | |
| Hadapan Pom | 0.0 | 0.0 | | | | | | | | | | | | | | | | | | | |
| CEP Renggam estate | 21.46 | 8.94 | | | | | | | | | | | | | | | | | | | |
| Kulai estate | 56.96 | 23.73 | | | | | | | | | | | | | | | | | | | |
| Layang estate | 33.02 | 13.76 | | | | | | | | | | | | | | | | | | | |
| Seri Pulai estate | 31.01 | 12.22 | | | | | | | | | | | | | | | | | | | |

Principle 7: Protect, conserve and enhance ecosystems and the environment

| Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques. | | | |
|---|---|---|----------|
| 7.1.1 | <p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p> | <p>IPM Plan has been established in sampling estates which includes the planting of beneficial plants and control of damage by rodents and leaf eating pest.</p> <p>Beneficial plants such as <i>Turnera subulata</i> and <i>Cassia cobanensis</i> are grown in the estate and their records of planting in new areas and maintenance of existing areas of beneficial plants and location maps are available. Leaf-eating pest census was regularly carried out to obtain information about threshold level and action to be taken thereafter. Census records were available for verification which has shown the effectiveness of the planting of beneficial plants to reduce the leaf eating caterpillars.</p> <p>IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Barn owls <i>Tyto Alba</i> has been introduced for biological control of rats. Barn owl boxes are constructed at the rate of 1 box to 10ha.</p> <p>For example at Layang Estate, planting of beneficial plant (BP) has been extended and increased based on target 2 dm/ha. Total planted BP recorded at 342.98 ha as to date.</p> | Complied |
| 7.1.2 | <p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p> | <p>Species referenced in the Global Invasive Species Database and CABI.org are not used in the estates.</p> | Complied |

| 7.1.3 | <p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p> | <p>There was no evidence of use of fire for pest control in all the estates.</p> | Complied | | | | | | | | | |
|---|--|--|---------------|-----------|---------------|-------------|------------------------------------|--------------------|-------------|---------------------------------------|----------|----------|
| Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment. | | | | | | | | | | | | |
| 7.2.1 | <p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p> | <p>The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 01/07/2011. Selected products are specific to the target pest, weed and disease.</p> <p>Sample of SOP for pesticides/chemical application verified:</p> <table border="1" data-bbox="1137 815 1930 1098"> <thead> <tr> <th>SOP reference</th> <th>SOP title</th> <th>Chemical name</th> </tr> </thead> <tbody> <tr> <td>CP-SOP-M-24</td> <td>Pre-emergent herbicide application</td> <td>Alion (Indaziflam)</td> </tr> <tr> <td>CP-SOP-M-21</td> <td>Trunk injection using 75% SP Acephate</td> <td>Acephate</td> </tr> </tbody> </table> | SOP reference | SOP title | Chemical name | CP-SOP-M-24 | Pre-emergent herbicide application | Alion (Indaziflam) | CP-SOP-M-21 | Trunk injection using 75% SP Acephate | Acephate | Complied |
| SOP reference | SOP title | Chemical name | | | | | | | | | | |
| CP-SOP-M-24 | Pre-emergent herbicide application | Alion (Indaziflam) | | | | | | | | | | |
| CP-SOP-M-21 | Trunk injection using 75% SP Acephate | Acephate | | | | | | | | | | |
| 7.2.2 | <p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p> | <p>Records of pesticides used (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) is maintained by the estate and submitted to the Head Quarters on a monthly basis. For example for the last 3 months (September – November 2022), Ai/ha ranging from 0.34 – 0.775 were recorded.</p> | Complied | | | | | | | | | |

| | | | |
|-------|---|---|----------|
| 7.2.3 | <p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p> | <p>The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan.</p> <p>Sighted during the site visit at 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> <p>The effectiveness of the implementation of IPM methods were monitored via census records that were available for verification. Records such as rat damages and bagworm damages showed reduction trends in line with the increase of IPM implementation in the estates. This data base was verified and available at site. The a.i per ha was reduce from everage usage chemical for every estate was 0.891 (Nov 2021) into 0.65 (Nov 2022).</p> | Complied |
| 7.2.4 | <p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p> | <p>There is no evidence of prophylactic use of pesticides in 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.</p> <p>The due diligence refers to:</p> <p>a) Judgment of the threat and verify why this is a major threat</p> <p>b) Why there is no other alternative which can be used</p> | <p>Sighted in the Chemical Registers showed that only class III & IV chemicals were used at all the estates visited. During the site visit to the chemical store it was justified that there were only class II, III and IV chemicals being used. Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead. Monocrotophos was eliminated and in its place, Acephate is used</p> | Complied |

| | | | |
|-------|--|--|----------|
| | <p>c) Which process was applied to verify why there is no other less hazardous alternative</p> <p>d) What is the process to limit the negative impacts of the application</p> <p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p> | | |
| 7.2.6 | <p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p> | <p>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers in the estate.</p> <p>Sampled the training conducted for pesticide handlers as below: - Pesticides/Chemical Spraying Training – 6/12/22 (Kulai Estate)</p> <p>Other details of training for pesticides operator can be found under indicator 3.7.1 and 3.7.2</p> | Complied |
| 7.2.7 | <p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p> | <p>There are no changes as previous assessment finding. During site verification at store of pesticides were found stored in the mill and estate's Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.</p> | Complied |

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| 7.2.8 | <p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p> | <p>The procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established.</p> <p>a) Collection of SW is made by licensed vendor registered with DOE. I.e Perniagaan Saudar Baru and Kualiti Alam Sdn Bhd etc</p> <p>b) The clinical waste SW 404 is disposed to Kualiti Alam Sdn Bhd</p> <p>c) Empty containers were tripled rinsed, pierced and delivered to a registered recycler company M/s SS Setia Enterprise by DOE and Jabatan Pertanian. Summary of recycle waste disposal as per below:</p> <table border="1" data-bbox="1155 691 1928 842"> <thead> <tr> <th></th> <th>Date</th> <th>Empty container</th> <th>Kenlon bottle</th> <th>Cartoon Boxes</th> <th>Plastic</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>9/12/2022</td> <td>94 units</td> <td>5 units</td> <td>130 kg</td> <td>741 kg</td> <td>Layang Estate</td> </tr> </tbody> </table> | | Date | Empty container | Kenlon bottle | Cartoon Boxes | Plastic | Estate | 1 | 9/12/2022 | 94 units | 5 units | 130 kg | 741 kg | Layang Estate | Complied |
|--------|--|--|---------------|---------------|-----------------|---------------|---------------|---------|--------|---|-----------|----------|---------|--------|--------|---------------|----------|
| | Date | Empty container | Kenlon bottle | Cartoon Boxes | Plastic | Estate | | | | | | | | | | | |
| 1 | 9/12/2022 | 94 units | 5 units | 130 kg | 741 kg | Layang Estate | | | | | | | | | | | |
| 7.2.9 | <p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p> | <p>No aerial spraying for pesticide were done in the estate.</p> | Complied | | | | | | | | | | | | | | |
| 7.2.10 | <p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p> | <p>Sampling in Seri Pulai Estate, the medical Surveillance was conducted on July 2022 for workers exposed to chemicals and fumes in the estate at Klinik Rengam. The results indicated that all workers were fit to work with no occupational related health issues.</p> <p>The medical surveillance conducted 3 phase in Layang estate as per below;-</p> <p>Date: 01/09/2022 (5 workers)</p> <p>Date: 02/09/2022 (5 workers)</p> <p>Date: 03/09/2022 (4 workers)</p> | Complied | | | | | | | | | | | | | | |

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| | | <p>The medical surveillance conducted at Klinik Rengam. From result showed was fit to work with chemical.</p> <p>In mill, Medical surveillance (Report No. 093/OHD/2021) conducted at Kilinik Segamat (Dr Ling kay Kwong). 19 workers have been send for medical surveillance. From the record all workers are fit to work with chemical.</p> <p>There also conducted chemical exposure monitoring on 11/1/2022 by Procoma Environmental (M) Sdn Bhd. The parameter monitored on n-Hexane, manganese and inhalable dust. The record as per below:-</p> <table border="1" data-bbox="1137 710 1915 922"> <thead> <tr> <th>Monitoring Parameter</th> <th>Exposure level (mg/m3)</th> <th>PEL, TWA- 8 hours (mg/m3)</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>n-Hexane</td> <td>1.17</td> <td>176</td> <td>Complied</td> </tr> <tr> <td>Manganese</td> <td>0.2</td> <td>0.6</td> <td>complied</td> </tr> </tbody> </table> | Monitoring Parameter | Exposure level (mg/m3) | PEL, TWA- 8 hours (mg/m3) | Remarks | n-Hexane | 1.17 | 176 | Complied | Manganese | 0.2 | 0.6 | complied | |
|----------------------|---|---|----------------------|------------------------|---------------------------|---------|----------|------|-----|----------|-----------|-----|-----|----------|--|
| Monitoring Parameter | Exposure level (mg/m3) | PEL, TWA- 8 hours (mg/m3) | Remarks | | | | | | | | | | | | |
| n-Hexane | 1.17 | 176 | Complied | | | | | | | | | | | | |
| Manganese | 0.2 | 0.6 | complied | | | | | | | | | | | | |
| 7.2.11 | <p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p> | <p>SOU24 estate has prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Gender Policy and Occupational Safety and Health Policy signed by the Managing Director on January 2015.</p> <p>It was sighted during the visit to the stores there were signages stating that pregnant and breast-feeding women are not allowed to enter the chemical stores.</p> <p>During the visit to the Chemical Store in Kulai Estate, it was noticed that the storekeeper was a female who was currently pregnant. The management have mentioned that they are aware that the storekeeper is pregnant. Nevertheless, the pregnant storekeeper is</p> | Non-compliance | | | | | | | | | | | | |

| | | <p>still currently working as the chemical storekeeper and has not been offered alternative work as verified during the audit. Furthermore, there were excessive fumes coming out of the chemical store due to poor ventilation. This was against the company policy that states "Sprayer atau pekerja Wanita yang bekerja secara langsung dengan bahan kimia yang disahkan hamil akan ditugaskan ke bahagian lain sepanjang kehamilan" and memo dated 01/11/2022 entitled "Larangan Terlibat Dalam Urusan Berkaitan dengan Chemical". Thus Major NC been raised.</p> | | | | | | | | | | | | | |
|---|---|---|--|----------|---------|---|-----|---|---|-------|---|---|------|---|----------|
| Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner. | | | | | | | | | | | | | | | |
| 7.3.1 | <p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p> | <p>SOU24 Hadapan POM and Estates had identified all wastes and sources of pollution. The Waste Management Action Plan FY 2022 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estate and mill operations were:</p> <table border="1" data-bbox="1137 890 1908 1348"> <thead> <tr> <th></th> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>Land</td> <td>Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.</td> </tr> </tbody> </table> | | Receptor | Sources | 1 | Air | Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG | 2 | Water | Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down | 3 | Land | Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste. | Complied |
| | Receptor | Sources | | | | | | | | | | | | | |
| 1 | Air | Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG | | | | | | | | | | | | | |
| 2 | Water | Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down | | | | | | | | | | | | | |
| 3 | Land | Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste. | | | | | | | | | | | | | |

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| | | <p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2022. The waste generated from the mill/estate operations as shown below;</p> <table border="1" data-bbox="1137 491 1899 759"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> <tr> <td>2</td> <td>Domestic waste</td> <td>rubbish from the mill complex and employees' quarters</td> </tr> <tr> <td>3</td> <td>Industrial waste</td> <td>Fibre, palm kernel shell, boiler ash, scrap iron</td> </tr> <tr> <td>4</td> <td>Sewage</td> <td>Sewage from housing/office complex</td> </tr> </tbody> </table> <p>The pollution identified from the mill activities</p> <table border="1" data-bbox="1137 823 1899 1023"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke and particulate</td> <td>Emission from Boilers</td> </tr> <tr> <td>2</td> <td>Odour & gases</td> <td>Activities from the effluent treatment</td> </tr> <tr> <td>3</td> <td>Leakage of lubricant</td> <td>Storage & vehicle maintenance</td> </tr> </tbody> </table> | | Type of waste | Details | 1 | Scheduled waste | Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries | 2 | Domestic waste | rubbish from the mill complex and employees' quarters | 3 | Industrial waste | Fibre, palm kernel shell, boiler ash, scrap iron | 4 | Sewage | Sewage from housing/office complex | | Type of waste | Details | 1 | Black smoke and particulate | Emission from Boilers | 2 | Odour & gases | Activities from the effluent treatment | 3 | Leakage of lubricant | Storage & vehicle maintenance | |
|-------|---|--|----------|---------------|---------|---|-----------------|--|---|----------------|---|---|------------------|--|---|--------|------------------------------------|--|---------------|---------|---|-----------------------------|-----------------------|---|---------------|--|---|----------------------|-------------------------------|--|
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| 3 | Leakage of lubricant | Storage & vehicle maintenance | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.3.2 | <p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p> | <p>Procedure SD/SDP/PSQM (ESH)/203- EN1 – Scheduled Wastes (Hazardous Waste) Management has been established.</p> <ul style="list-style-type: none"> a) Management and disposal of wastewater 2022 has been established compiled by Assistant Engineer. b) Waste Management Plan 2022 has been established prepared by QA and verified by the Assistant Engineer in Jan 2022. The management Plan for 2022 has yet to be finalised the source and disposal method of scheduled waste, domestic waste and industrial waste. c) Based on Environmental Impact Evaluation (file no: SM/5.2/EIE) and Environment Aspect and Impact | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <p>Identification (file no: SM/5.2/EAI) improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination.</p> <p>d) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.</p> <p>e) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal.</p> <p>f) Empty containers were tripled rinsed, pierced and delivered to a registered recycler company M/s SS Setia Enterprise by DOE and Jabatan Pertanian.</p> <table border="1" data-bbox="1153 911 1928 1109"> <thead> <tr> <th></th> <th>Date</th> <th>Empty container</th> <th>Kenlon bottle</th> <th>Cartoon Boxes</th> <th>Plastic</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>9/12/2022</td> <td>94 units</td> <td>5 units</td> <td>130 kg</td> <td>741 kg</td> <td>Layang Estate</td> </tr> </tbody> </table> <p><u>Hadapan POM</u></p> <p>Disposal of scheduled waste was carried out in May and October 2022. Summary of waste disposal as per below:</p> <table border="1" data-bbox="1137 1289 1928 1335"> <thead> <tr> <th>Waste category</th> <th>Quantity</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> | | Date | Empty container | Kenlon bottle | Cartoon Boxes | Plastic | Estate | 1 | 9/12/2022 | 94 units | 5 units | 130 kg | 741 kg | Layang Estate | Waste category | Quantity | Remarks | | | | |
|----------------|-----------|--|---------------|---------------|-----------------|---------------|---------------|---------|--------|---|-----------|----------|---------|--------|--------|---------------|----------------|----------|---------|--|--|--|--|
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| SW 305 | 0.021 mt, Consignment no. 2022052612RF19M 8 | Disposed by Kualiti Alam on 31/05/2022 | | | | | | | | | | | | | |
| 7.3.3 | <p>The unit of certification does not use open fire for waste disposal. - Minor compliance -</p> | <p>There was no land preparation in SOU 9 Mill and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> a) EQMS-SOP-Section B2 - Under felling/clearing & land preparation b) Carbon Policy <p>SDP has a policy of no open burning. As advocated, the estate practiced zero burning. In the replants visited during the audit in the Estate, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p> | Complied | | | | | | | | | | | | |

| Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield. | | | | | | | | | | | | |
|--|---|---|----------|------|----------------|-------|------------|-------|---------|------------|--------|----------|
| 7.4.1 | <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>All sample Estates operate in accordance with the Agriculture Manual and standard operating procedures. The practices are consistently monitored by estate operation management and the regional office. The recommendations for improvements are given to maintain sustainable practices. Leaf analysis and foliar sampling will be monitored on yearly basis. Variable dosage recommendation was given by the agronomist for fertilizer input for all sample Estates. ARM Section 8 Rev: 02 Issue date: June 2021 covers the procedure for fertilizer application for both immature and mature. The procedure gives the guideline type of fertilizers to be used, timing to apply, dosage and placement.</p> | Complied | | | | | | | | | |
| 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.</p> <p>- Minor compliance -</p> | <p>Periodic foliar sampling analysis was last conducted in 2021 for the sampled estates to monitor the changes in nutrient status. The results of the analysis were used by the agronomist for their recommendation for fertilizers applications programmed. The soil analysis is done once in 5 years. Analysis reports were made available for verification.</p> | Complied | | | | | | | | | |
| 7.4.3 | <p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p> | <p>EFB application is done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from Hadapan POM. The best practice of EFB application is described in the ARM. Records were available for verification. Based on the records, it was noted that the EFB application rate per hectare was around 28mt/ha.</p> <p>CEP Renggam Estate</p> <table border="1"> <thead> <tr> <th>Field</th> <th>Date</th> <th>EFB total (mt)</th> </tr> </thead> <tbody> <tr> <td>2011A</td> <td>26/06/2022</td> <td>32.94</td> </tr> <tr> <td>Replant</td> <td>29/06/2022</td> <td>101.31</td> </tr> </tbody> </table> | Field | Date | EFB total (mt) | 2011A | 26/06/2022 | 32.94 | Replant | 29/06/2022 | 101.31 | Complied |
| Field | Date | EFB total (mt) | | | | | | | | | | |
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|----------------|---|--|--------------|----|-----------------|-----------|---------------|----------------|-------|------------|----------------|-------|------------|-------|-------------|----|-----------------|-----------|----------------|-------|------|-----|----------|
| Kulai estate | | | | | | | | | | | | | | | | | | | | | | | |
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| 2010A | 26/04/2022 | 26.97 | | | | | | | | | | | | | | | | | | | | | |
| 7.4.4 | <p>Records of fertiliser inputs are maintained. - Minor compliance -</p> | <p>Records of fertiliser input were well maintained in various documents such as store issuance record, bin cards and month end account to name a few. Among the information available in the records was type of fertiliser, quantity and field number applied including date of application. Based on sampled fields, the amount of fertilisers issued out (i.e. applied) from the store according to SAP software system was tally with the recommendations by agronomist, for all the sampled estates. Sample as per below:-</p> <p>Kulai Estate</p> <table border="1"> <thead> <tr> <th>Block /Date</th> <th>Ha</th> <th>Type fertiliser</th> <th>Total bag</th> </tr> </thead> <tbody> <tr> <td>2001 Oct 2022</td> <td>1.58</td> <td>RP</td> <td>4</td> </tr> <tr> <td>2006C Jan 2022</td> <td>52.54</td> <td>NKC1</td> <td>356</td> </tr> </tbody> </table> <p>Layang estate</p> <table border="1"> <thead> <tr> <th>Block /Date</th> <th>Ha</th> <th>Type fertiliser</th> <th>Total bag</th> </tr> </thead> <tbody> <tr> <td>2008 July 2022</td> <td>77.92</td> <td>NKC1</td> <td>737</td> </tr> </tbody> </table> | Block /Date | Ha | Type fertiliser | Total bag | 2001 Oct 2022 | 1.58 | RP | 4 | 2006C Jan 2022 | 52.54 | NKC1 | 356 | Block /Date | Ha | Type fertiliser | Total bag | 2008 July 2022 | 77.92 | NKC1 | 737 | Complied |
| Block /Date | Ha | Type fertiliser | Total bag | | | | | | | | | | | | | | | | | | | | |
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| | | | | | | | |
|--|---|--|-------|-----------|-----|----------|--|
| | | 2004 May 2022 | 55.17 | Kieserite | 163 | | |
| Criterion 7.5: Practices minimise and control erosion and degradation of soils. | | | | | | | |
| 7.5.1 | <p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p> | <p>Maps identifying the soil and terrain were made available by all the sampled estates. The maps were prepared by SDP's R&D-Plantation Research & Advisory Precision Agriculture Unit (EIM), dated 13/08/2021. Major soil type in all estate was Renggam Series, Local Alluvium series and Harimau series. There are some fragile soil (peat soil) in Seri Pulai estate. The peat soil was found in the Seri Pulai Estate specifically in the northern and west part of the estate area approximate about 205.619 Ha.</p> | | | | Complied | |
| 7.5.2 | <p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p> | <p>Replanting plan at CEP Renggam Estate was observed at steep terrain between 20° – 24°. The area size is approximately 10ha. In Kulai estate there are 0.28% for more than 25°, as per site verification no replanting or palm planting at 25° area.</p> | | | | Complied | |
| 7.5.3 | <p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p> | <p>No new planting as per verification on site and interview with stakeholder and management team.</p> | | | | Complied | |
| Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations. | | | | | | | |
| 7.6.1 | <p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p> | <p>Sighted annual soil and leaf analysis record for the year 2022 in Agronomist report which covered soil and leaf analysis for all sample Estates.</p> | | | | Complied | |

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Based on the report the soil use to plant Palm oil is suitable and rich in nutrients. The monitoring of soil is done annually by R&D Development, Sime Darby Plantation Berhad.

This survey is among determining the long term suitability of land for oil palm cultivation for the next 25 years. The soil condition in all field found suitable for OP cultivation

Prepared on 14/10/2014 by R&D Precision Agriculture Unit (NHS).

| Estate | Soil Class | Hectarage percentage |
|-------------|----------------|----------------------|
| CEP Renggam | Renggam | 68.04 |
| | Local alluvium | 7.40 |
| | Jerangau | 6.8 |
| | Organic clay | 5.06 |
| | Bungor | 3.41 |
| | Local alluvium | 3.27 |
| | Bukit Luchu | 3.16 |
| | Tampin | 1.13 |
| | Masai | 0.77 |
| | Pelepah | 0.51 |
| | Muchong | 0.26 |
| Kulai | Bukit temiang | 0.39 |
| | Kampung Kubur | 0.39 |
| | Kulai | 3.29 |

| | | | | | |
|--|--|--|----------------|-------|----------|
| | | | Lanchang | 2.97 | |
| | | | Local Alluvium | 1.68 | |
| | | | Masai | 2.21 | |
| | | | Organic clay | 1.14 | |
| | | | Pelepah | 0.46 | |
| | | | Rengam | 43.75 | |
| | | | Tepus | 15.8 | |
| | | | Yong Peng | 5.28 | |
| | | Layang | Harimau | 56.51 | |
| | | | Kelau | 3.71 | |
| | | | Local Alluvium | 20.58 | |
| | | | Rengam | 5.96 | |
| 7.6.2 | Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance - | Based on the report the soil use to plant Palm oil is suitable and rich in nutrients. The monitoring of soil is done annually by R&D Development, Sime Darby Plantation Berhad. This survey is among determining the long term suitability of land for oil palm cultivation for the next 25 years. The soil condition in all field found suitable for OP cultivation. | | | Complied |
| 7.6.3 | Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance - | Soil and Slope maps were available in all sample Estates and used to address the planning of infrastructure in all sample estates. No establishment of new planting in all sample Estates thus far. | | | Complied |
| Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly. | | | | | |

| | | | |
|-------|--|---|----------|
| 7.7.1 | <p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -</p> | <p>There is no new planting on after 15 November 2018 in existing and new development areas at all the sampled estates.</p> | Complied |
| 7.7.2 | <p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -</p> | <p>Existing palms were planted for a total area of 205.6 ha (10.20%) of peat soil. Based on the survey area, the area was classified as flat terrain & predominantly with a slope class of < 2o. Map of peat soil was prepared on 24th May 2019 (scale 1:22,000) by R&D – Precision Agriculture Unit. The locality of peat was found in the northern & west part of the estate. Peat depth varies from moderately deep to deep (sapric condition). A layer of organic matter is more than 50cm. Verified email submission from Group Sustainability Dept. SDPB dated 14/11/2019 to RSPO Secretariat. The purpose of the email is to notify the RSPO Unit about the Peat inventory for the entire Sime Darby Estates in Malaysia. The peat soil was found in the Seri Pulai Estate specifically in the northern and west part of the estate area approximate about 205.619 Ha. Other supporting documents attached were inventory table (which has the information about estate names and peat area size), and location map of the peat area. Second submission for peat inventory for reporting period of 6 November 2022 to 5 November 2023 has yet to be submitted and the dateline is by 5 November 2023. This will be further verified in the next assessment.</p> | Complied |
| 7.7.3 | <p>(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -</p> | <p>Map of subsidence poles are available in Seri Pulai Estate. Estate management has complied with the recommendation made by GSD and RSPO requirement about the monitoring of subsidence at peat area. During the site visit to the peat area at Block 2003A and 2013A it was found that subsidence pole was well maintained and the reading of subsidence is promptly updated.</p> | Complied |

| | | | |
|-------|--|--|----------|
| 7.7.4 | <p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p> | <p>Refer to the Peat soil verification at Seri Pulai Estate prepared by PRA_RGSA (Soil Unit) dated 15th May 2019, a recommendation has made to the estate management to install both piezometer (water table tube) and peat subsidence pole in the field. For water level monitoring, a water level marker needs to be installed at the outlet and to maintain water at 40 – 60 cm from the soil surface. Estate management has installed the piezometer at the collection drain and the monitoring of the water level is made on monthly basis. Verified the records of water table monitoring for the year 2022 which was prepared by the Assistant Manager and verified by Estate Manager. The reading of water level is within the optimum level i.e. 40 – 60 cm</p> | Complied |
| 7.7.5 | <p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p> | <p>As per replanting programme the existing peat area planted with oil palm is not programmed for replanting in the next 5 years.</p> | Complied |
| 7.7.6 | <p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> | <p>The estate has installed both Piezometer & Peat Subsidence Pole in the field in accordance to RSPO requirements. These instruments (Piezometer & Subsidence Pole) were visibly marked & placed within an accessible distance (3 palms away from the main road). The</p> | Complied |

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| | - Critical (Major) compliance - | estate has erected a water level marker at the field outlet & keeps maintaining the water level at 40 - 60cm from the soil surface. | | | | | | | | | | | | | |
|---|--|--|---------------|-------|--------------------------|------|------|---------------|--|--|--|--|--|--|----------|
| 7.7.7 | <p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p> | Peatland conservation areas were not available at all visited estate. The peat moisture has been maintained & natural water regimes were monitored accordingly. Rehabilitation measures were demonstrated whereby the fire prevention plan & natural revegetation of both secondary/indigenous plants were sighted in this block. | Complied | | | | | | | | | | | | |
| Criterion 7.8: Practices maintain the quality and availability of surface and groundwater. | | | | | | | | | | | | | | | |
| 7.8.1 | <p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p> | <p>Both the Mill and Estate had established its Water Management Plan for year 2022 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <p>a) Implementation of rain water harvest,</p> <p>b) Construction of water gate for effective management of field drains,</p> <p>c) Establishment of <i>Mucuna bracteata</i> to prevent erosion,</p> <p>d) Side drain at field road to control water, frond stacking,</p> <p>e) Enhancement of ground vegetation at bare ground area.</p> <p>The water sources are as shown below;</p> <table border="1" style="width: 100%; text-align: center;"> <thead> <tr> <th>Water sources</th> <th>Usage</th> <th>Monitoring & measurement</th> <th>Freq</th> <th>PI C</th> <th>Review status</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> | Water sources | Usage | Monitoring & measurement | Freq | PI C | Review status | | | | | | | Complied |
| Water sources | Usage | Monitoring & measurement | Freq | PI C | Review status | | | | | | | | | | |
| | | | | | | | | | | | | | | | |

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|--|--|--|--------------------------------------|---|----------------------------|----------------------|--|
| | | 2 | Severe water pollution/Contamination | to obtain water from local authority to train/educate staff/workers to conserve water to seek assistance from local authority to obtain treated water supply from mill's WTP | Manager AM// Mill Engineer | As and when required | |
| | | 3 | Salt water intrusion | Flushing out water during dry & low tide season Construction of screw gate to prevent entry into field drain Regular inspection during high tide to identify any tide gate and flap door. | Estate Mgmt | Schedule | |
| | | <p>The Estate had implemented water managements plans which covered:</p> <ul style="list-style-type: none"> a) Water shortage contingencies b) Water pollution prevention c) Reduce wastage d) Identification & management of waste waters e) Monitoring rainfall f) Regular water quality analysis. <p>The water reduction plan is shown below;</p> | | | | | |

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

The Mill Identification & Management of Waste Water

| location | Wastewater produced | Treatment/containment | Reuse/recycle/disposal method |
|----------|---------------------|-----------------------|-------------------------------|
| | | | |

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|-------|--|--|---------------------|--|------------------------------|-----------------------------------|------------------------|
| | | 1 | Processing stations | Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water | Oil recovery/ETP | Recover into system | |
| | | 2 | Boiler | Blow down, cleaning water | Sludge pit, ETP | Monsoon drain | |
| | | | Process ramp | Rainfall runoff | Sedimentation trap | Monsoon drain | |
| | | 3 | Engine room | Steam condensate, turbine cooling water | Monsoon drain, recycled tank | Monsoon drain | |
| | | 4 | Lab | Cleaning water | Process drain | Monsoon drain | |
| | | 5 | Wash room | Toilet water, cleaning water | Septic tank | Collected by licensed contractor. | |
| 7.8.2 | <p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p> | <p>SOU24 estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime</p> | | | | | <p>Choose an item.</p> |

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Darby Plantation dated April 2014). The buffer zones established are as follows:

| | <i>River width</i> | <i>Buffer zone</i> |
|---|--------------------|--------------------|
| 1 | > 40 meters | 50 meters |
| 2 | 20 - 40 meters | 40 meters |
| 3 | 10 - 20 meters | 20 meters |
| 4 | 5 - 10 meters | 10 meters |
| 5 | < 5 meters | 5 meters |

The signboards were displayed accordingly at the site where applicable. The guideline was issued by the GSQM Unit with latest revision dated on 13/6/2011.

Water analysis report for surface water/river carried out every quarter as per SOP, Water Quality Monitoring, issue:1 dated 1/6/2016. Result of analysis summarized as per below:

| Estate | Date of monitoring | Remarks |
|---------------|--------------------|-------------|
| Layang Estate | 11/11/2022 | IE1398/2022 |
| Kulai Estate | 1/12/2022 | PL737/2022 |

A few parameters recorded were not complied with class IIA/IIB of NWQS and also pesticides residue in water analysis. Internal CAR was issued, and proper investigation of root cause and corrective action have been implemented

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| | | <p>A few parameters recorded were not complied with class IIA/IIB of NWQS. Internal CAR was issued, and proper investigation of root cause and corrective action have been implemented.</p> <p>Samples are taken by the mill management for detection of any pollution arising from the mill and estate activities. As required under compliance schedule, clause 19 water samples from the upstream and downstream of Sg Sayong are taken for analysis for detection of any contamination /quality effect to the water courses. Among others management plan taken;</p> <ul style="list-style-type: none"> a) Regular inspection at buffer/HCV areas b) Monitor water from surrounding areas c) Track, measure and report all activities around river d) Train and educate workers. | | | | | | | | | | | | | | | | | |
|-----------|--|--|-------|--------------------------------|-------|-------|-----|-----------|-----|----|------|-----|------|-----|--------|-----|-----------|----|----------|
| 7.8.3 | <p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p> | <p>Based on "<i>Jadual Pematuhar</i>" (license no 006385 valid till 30/06/2023) Hadapan POM disposed effluent on land application in Layang Estate (Hadapan Division). Sighted quarterly report has been submitted to DOE by quarterly basis. Summary of BOD₃ for 2nd and 3rd quarter of 2022 summarized as per below:</p> <table border="1" data-bbox="1137 1042 1928 1385"> <thead> <tr> <th>Month</th> <th>BOD₃ result (mg/l)</th> <th>Limit</th> </tr> </thead> <tbody> <tr> <td>April</td> <td>119</td> <td rowspan="7">2500 mg/l</td> </tr> <tr> <td>May</td> <td>63</td> </tr> <tr> <td>June</td> <td>133</td> </tr> <tr> <td>July</td> <td>114</td> </tr> <tr> <td>August</td> <td>245</td> </tr> <tr> <td>September</td> <td>63</td> </tr> </tbody> </table> | Month | BOD ₃ result (mg/l) | Limit | April | 119 | 2500 mg/l | May | 63 | June | 133 | July | 114 | August | 245 | September | 63 | Complied |
| Month | BOD ₃ result (mg/l) | Limit | | | | | | | | | | | | | | | | | |
| April | 119 | 2500 mg/l | | | | | | | | | | | | | | | | | |
| May | 63 | | | | | | | | | | | | | | | | | | |
| June | 133 | | | | | | | | | | | | | | | | | | |
| July | 114 | | | | | | | | | | | | | | | | | | |
| August | 245 | | | | | | | | | | | | | | | | | | |
| September | 63 | | | | | | | | | | | | | | | | | | |

| 7.8.4 | <p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p> | <p>The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis with the latest recording detailed sampled (water usage m3/per mt of fresh fruit bunches (FFB) below;</p> <table border="1" data-bbox="1272 518 1624 1214"> <thead> <tr> <th></th> <th>Month</th> <th>2022</th> </tr> </thead> <tbody> <tr><td>1</td><td>Jan</td><td>1.09</td></tr> <tr><td>2</td><td>Feb</td><td>0.98</td></tr> <tr><td>3</td><td>Mac</td><td>0.88</td></tr> <tr><td>4</td><td>April</td><td>1.04</td></tr> <tr><td>5</td><td>May</td><td>1.21</td></tr> <tr><td>6</td><td>June</td><td>0.93</td></tr> <tr><td>7</td><td>July</td><td>1.03</td></tr> <tr><td>8</td><td>Aug</td><td>1.03</td></tr> <tr><td>9</td><td>Sept</td><td>0.54</td></tr> <tr><td>10</td><td>Oct</td><td>0.98</td></tr> <tr><td>11</td><td>Nov</td><td>-</td></tr> <tr><td>12</td><td>Dec</td><td>-</td></tr> <tr><td></td><td>Average</td><td>0.89</td></tr> </tbody> </table> <p>A slightly noted, in factors</p> <p>higher water usage probably due to the proportionate reduction volume of FFB being processed. There were variations of performance. Probable are linked to rainy days, significant boiler water rinsing/discharging for maintenance etc.</p> | | Month | 2022 | 1 | Jan | 1.09 | 2 | Feb | 0.98 | 3 | Mac | 0.88 | 4 | April | 1.04 | 5 | May | 1.21 | 6 | June | 0.93 | 7 | July | 1.03 | 8 | Aug | 1.03 | 9 | Sept | 0.54 | 10 | Oct | 0.98 | 11 | Nov | - | 12 | Dec | - | | Average | 0.89 | Complied |
|--|--|---|----------|-------|------|---|-----|------|---|-----|------|---|-----|------|---|-------|------|---|-----|------|---|------|------|---|------|------|---|-----|------|---|------|------|----|-----|------|----|-----|---|----|-----|---|--|---------|------|----------|
| | Month | 2022 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Jan | 1.09 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Feb | 0.98 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Mac | 0.88 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | April | 1.04 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | May | 1.21 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | June | 0.93 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | July | 1.03 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | Aug | 1.03 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | Sept | 0.54 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 | Oct | 0.98 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11 | Nov | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12 | Dec | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Average | 0.89 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.9.1 | <p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p> | <p>For the estates, the plan to optimise the usage of diesel is documented in the Energy Management Plan 2022. Among the action plans implemented are by doing regular maintenance of</p> | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|--|--|---|----------|
| | | <p>diesel-powered machinery and educational programme for the operators on fuel saving. The fossil fuel consumption is recorded as part of monitoring. For FY 2022, to date data recorded at 1.99 litre/mt of FFB compared to FY 2021 at 2.24 litre/mt of FFB.</p> <p>For the mill, the utilisation of fibre and shell as biofuel for boiler operation is consistently implemented to generate electricity through turbines. This helps to reduce the dependency to fossil fuel.</p> <p>Summary of</p> | |
| <p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p> | | | |
| 7.10.1 | <p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p> | <p>Main sources of GHG emission identified were methane (CH) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>The emission value is recorded and calculated through the utilisation of RSPO’s Palm GHG Calculator ver. 4. Detail of GHG calculation can be found under appendix B.</p> | Complied |
| 7.10.2 | <p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p> | <p>Not applicable since no new development by the certification unit.</p> | Complied |
| 7.10.3 | <p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p> | <p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e.</p> | Complied |

(SM/5.2/EAI) and (SM/5.2/EIE) which covers estate and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:

| | Environmental receptors | Source |
|---|-------------------------|---|
| 1 | Air | Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping). |
| 2 | Water | Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down |
| 3 | land | Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics. |

West Mill has conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit.

The mill was also equipped with a Continuous Emission Monitoring System (CEMS).

- a) The audit team has verified the condition of the CEMS during the audit.
- b) The system was found to be in functional condition.

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| | | <p>c) Data from the stack is connected online to DOE's office. Boiler smoke emission data are within the DOE limit.</p> <p>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent.</p> | |
| Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area | | | |
| 7.11.1 | <p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p> | <p>Guided by SDPB ARM, preparation of replanting using fire is not allowed. Based on site visit at replanting fields of the sampled estates, there was no trace of burning observed. Palm trunks were chipped and windrowed.</p> | Complied |
| 7.11.2 | <p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p> | <p>There was no land preparation by burning ever since SDPB practice zero burning as per the policy in:</p> <ul style="list-style-type: none"> a) EQMS-SOP-Section B2 - Under felling/clearing & land preparation b) Carbon Policy <p>The use of fire for waste disposal and for preparing land for oil palm cultivation or replanting was not practiced in the estate. The Group policy of "Zero open burning" has been enforced since July 2008. The operating units adhered to the policy of "Zero open burning" for any replanting. Furthermore, Sime Darby Plantation assigned 1 person based in HQ being in charge to detect any open fire in the Company's' fields using the Hotspot Dashboard. This is the measures taken by the organization to pledge towards zero open burning.</p> | Complied |
| 7.11.3 | <p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p> | <p>Both the estate and the mill in SOU 2 held engagement with the adjacent stakeholders via briefing sessions as stated in ERP procedure <i>Kertas Kerja Program Simulasi Kebakaran</i> dated 12/9/2019 and Fire Prevention and Control Measure. Therein containing</p> | Complied |

| | | | |
|--|---|--|-----------------|
| | | <ul style="list-style-type: none"> a) Objective b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill <p>All stakeholders being briefed in the respective stakeholders meetings in a brief agenda relating to fire prevention and issues relating to environmental.</p> | |
| <p>Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p> | | | |
| <p>7.12.1</p> | <p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p> | <p>There is no land clearing after November 2005. Nonetheless, In-House High Conservation Value (HCV) Assessment was carried out for SOU 24 Hadapan by PSQM Department In-House HCV Assessor i.e. Siti Norralakman Yahya, Nur Aida Ab. Gani, Norsyamimi Saifulizam and Briony Octovia Homer Mum on 16 – 20th December 2013 and re-verification visit on 13th December 2020 (New addendum). The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2). Hence, the requirement under this indicator does not apply</p> | <p>Complied</p> |
| <p>7.12.2</p> | <p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <ul style="list-style-type: none"> a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid. b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations. | <p>The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU 24 estates. Hence, the current HCV assessment of the estates remains valid. The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU24 estates. Hence, the requirement under this indicator does not apply.</p> | <p>Complied</p> |

| | | | |
|--------|---|--|----------------|
| | <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance -</p> | | |
| 7.12.3 | <i>Indicator is not applicable in Malaysia context</i> | | Not Applicable |
| 7.12.4 | <p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -</p> | The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU24 estates. Hence, the requirement under this indicator does not apply. | Not Applicable |
| 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. - Minor compliance -</p> | The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU24 estates. Hence, the requirement under this indicator does not apply | Not Applicable |
| 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</p> | <p>The HCV re-assessment was carried out by PSQM team on 16th – 20th December 2013 and re-verification visit on 13th December 2020 (New addendum). The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <p>a) Overview of HCV assessment</p> | Complied |

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| | <p>for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p> | <p>b) Description of assessment area</p> <ul style="list-style-type: none"> - Landscape context - biodiversity & conservation values - ecosystem service / social & cultural values <p>c) HCV criteria & application to agriculture</p> <ul style="list-style-type: none"> - Visual observation & supporting information - Wildlife in plantation - decision on HCV status <p>d) HCV management / Monitoring.</p> <p>A programme to regularly educate the workforce about the status of RTE species is in place and carried out on annual basis. Latest training was carried out in Layang Estate on 7/12/2022 and Kulai Estate on 6/12/22.</p> <p>The report is given in details to provide the existence of HCV, complete with photo and description The conservation and management of such identified areas are also detailed therein. The HCV areas presence as identified by the estates within SOU24 are as per below;</p> <table border="1" data-bbox="1137 976 1921 1378"> <thead> <tr> <th>Estates</th> <th>Assessed areas</th> <th>Area (Ha)</th> <th>HCV classification</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>SPE</td> <td>> 25° slope</td> <td>27.61</td> <td>HCV 4</td> <td>Promote soil conservation and prevent erosion</td> </tr> <tr> <td>KLE</td> <td>Water catchment</td> <td>0.77</td> <td>HCV 4</td> <td>Provide basic service (water resources) for critical situations</td> </tr> </tbody> </table> | Estates | Assessed areas | Area (Ha) | HCV classification | Remarks | SPE | > 25° slope | 27.61 | HCV 4 | Promote soil conservation and prevent erosion | KLE | Water catchment | 0.77 | HCV 4 | Provide basic service (water resources) for critical situations | |
|---------|--|--|--------------------|---|-----------|--------------------|---------|-----|-------------|-------|-------|---|-----|-----------------|------|-------|---|--|
| Estates | Assessed areas | Area (Ha) | HCV classification | Remarks | | | | | | | | | | | | | | |
| SPE | > 25° slope | 27.61 | HCV 4 | Promote soil conservation and prevent erosion | | | | | | | | | | | | | | |
| KLE | Water catchment | 0.77 | HCV 4 | Provide basic service (water resources) for critical situations | | | | | | | | | | | | | | |

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| | | LYE | Palm Oil Mill pond | 6.02 | HCV 4 | Provide basic service (water resources) for critical situations | | |
| | | CRE | Water catchment | 7.19 | HCV 4 | Provide basic service (water resources) for critical situations | | |
| | | <p>All areas were sighted and verified. HCV of all above are re-categorized areas from the normal buffer zone category. Hectare for the re-categorized areas has not affected the others category including the planted areas. All the HCVs were maintained by site specific operating units. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, catchment and were documented. Map verification and site visit confirmed that the estate are surrounded by river/straits and villages. The HCVs, conservation areas/environmentally sensitive areas e.g. bund along the stretches of river/straits which passes bordering through the estate had been identified and being monitored.</p> | | | | | | |
| 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 CU management has established a standard monitoring document. Details provided include the following information:</p> <ul style="list-style-type: none"> a) Area b) Field no and GPS coordinate c) Observation <ul style="list-style-type: none"> - Encroachment /sign of trespassing - Wildlife issues/conflicts/sighting - Pollution /erosion issues | | | | | | Non-compliance |

d) Maintenance of signage / fence

The monitoring being made by the AP during the security rounds in the estate complex. The field staff/Assistant also played a role in providing information during their daily rounds in the fields. Records furnished by the APs were sighted and verified.

| | Action steps | Action Plan | Date | PIC |
|---|---|---|----------|-----|
| 1 | Inspection of HCV | Continuous inspection and recommendation To liase with related agency | On-going | EM |
| 2 | Protection or conservation & monitoring of biodiversity area. | To continuously collaborate with R& D to monitor the status & health of trees | On-going | EM |
| 3 | Protection & conservation of mangrove forests area. | To erect signs indicating mangrove forest near coastal areas. To erect signs indicating mangrove forest as HCV areas for conservation. | On-going | EM |
| 5 | Rehabilitation & habitat enhancement | To participate in tree planting divers tree species to enhance the surrounding biodiversity. | On-going | EM |
| 6 | Interface with animals | Raise awareness of HCV/RTE to employees Employees are taught not to disturbed/hunt wildlife. Liaison with <i>Jabatan Perhilitan</i> on wildlife encounter/discovery | On-going | EM |

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| | | | | | | | | |
|--------|---|--|----------------|-------------------------|---|----------|----|--|
| | | <table border="1"> <tr> <td data-bbox="1153 363 1191 566">7</td> <td data-bbox="1191 363 1384 566">Education and awareness</td> <td data-bbox="1384 363 1713 566">Educate employees on importance of biodiversity. Encourage research on specific biodiversity To erect signage No fishing/no hunting/no swimming</td> <td data-bbox="1713 363 1809 566">On-going</td> <td data-bbox="1809 363 1908 566">EM</td> </tr> </table> <p>*EM – Estate management</p> <p>Based on site visit at Hadapan Division, P04A (water catchment - HCV 4); Visual observation at stagnant water near to HCV 4 area, unknown brownish colored liquid was seen overflowed to the catchment area. Latest HCV monitoring record on 8/12/22 has shown that no evidence of pollution (Can you spot any rubbish or oil or other pollution? and rated as no). No further investigation was made to ensure that brownish colored liquid comply with surface water quality under NQWS Class IIA/B and not updated in the management plan. Thus, a minor NC was issued.</p> | 7 | Education and awareness | Educate employees on importance of biodiversity. Encourage research on specific biodiversity To erect signage No fishing/no hunting/no swimming | On-going | EM | |
| 7 | Education and awareness | Educate employees on importance of biodiversity. Encourage research on specific biodiversity To erect signage No fishing/no hunting/no swimming | On-going | EM | | | | |
| 7.12.8 | <p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p> | <p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 24 estates. Hence, the requirement under this indicator does not apply.</p> | Not Applicable | | | | | |

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Appendix B: GHG Reporting Executive Summary

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

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

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

| Emission per product | tCO ₂ e/tProduct |
|----------------------|-----------------------------|
| CPO | 1.17 |
| PK | 1.17 |

| Extraction | % |
|------------|-------|
| OER | 16.30 |
| KER | 4.08 |

| Production | t/yr |
|--------------|------------|
| FFB Process | 214,649.01 |
| CPO Produced | 34,984.57 |
| PKO Produced | 8,757.39 |

| Land Use | Ha |
|-----------------------------|------------------|
| OP Planted Area | 27,168.92 |
| OP Planted on peat | 205.60 |
| Conservation (forested) | 0 |
| Conservation (non-forested) | 0 |
| Total | 27,374.52 |

Summary of Field Emission and Sink

| | Own Crop* | | Group | | 3 rd Party | | Total | |
|--|--------------------|--------------------------|--------------------|--------------------------|-----------------------|--------------------------|--------------------|--------------------------|
| | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB |
| Emission | | | | | | | | |
| Land Conversion | 94,059.89 | 0.59 | 9,688.32 | 0.63 | 0 | 0 | 103,748.21 | 1.22 |
| CO ₂ Emission from fertilizer | 11,924.58 | 0.08 | 1,210.21 | 0.08 | 0 | 0 | 13,134.79 | 0.16 |
| NO ₂ Emission | 8,190.47 | 0.05 | 664.62 | 0.04 | 0 | 0 | 8,855.09 | 0.09 |
| Fuel Consumption | 462.52 | 0 | 29.55 | 0 | 0 | 0 | 492.07 | 0 |
| Peat Oxidation | 11,118.57 | 0.07 | 0 | 0 | 0 | 0 | 11,118.57 | 0.07 |
| Sink | | | | | | | | |
| Crop Sequestration | -86,390.87 | -0.54 | -9,168.39 | -0.6 | 0 | 0 | -95,559.27 | -1.14 |
| Conservation Sequestration | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 39,481.16 | 0.25 | 2,424.30 | 0.16 | 8,280.71 | 0 | 50,186.16 | 0.41 |

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

| | tCO ₂ e | tCO ₂ e/tFFB |
|------------------------------|--------------------|-------------------------|
| Emission | | |
| POME | 0.00 | 0 |
| Fuel Consumption | 72.87 | 0 |
| Grid Electricity Utilization | 756.20 | 0 |
| Credit | | |
| Export of Grid Electricity | 0 | 0 |
| Sales of PKS | 0 | 0 |
| Sales of EFB | 0 | 0 |
| Total | 829.07 | 0 |

Summary of Kernel Crusher Emission and Credit (if applicable)

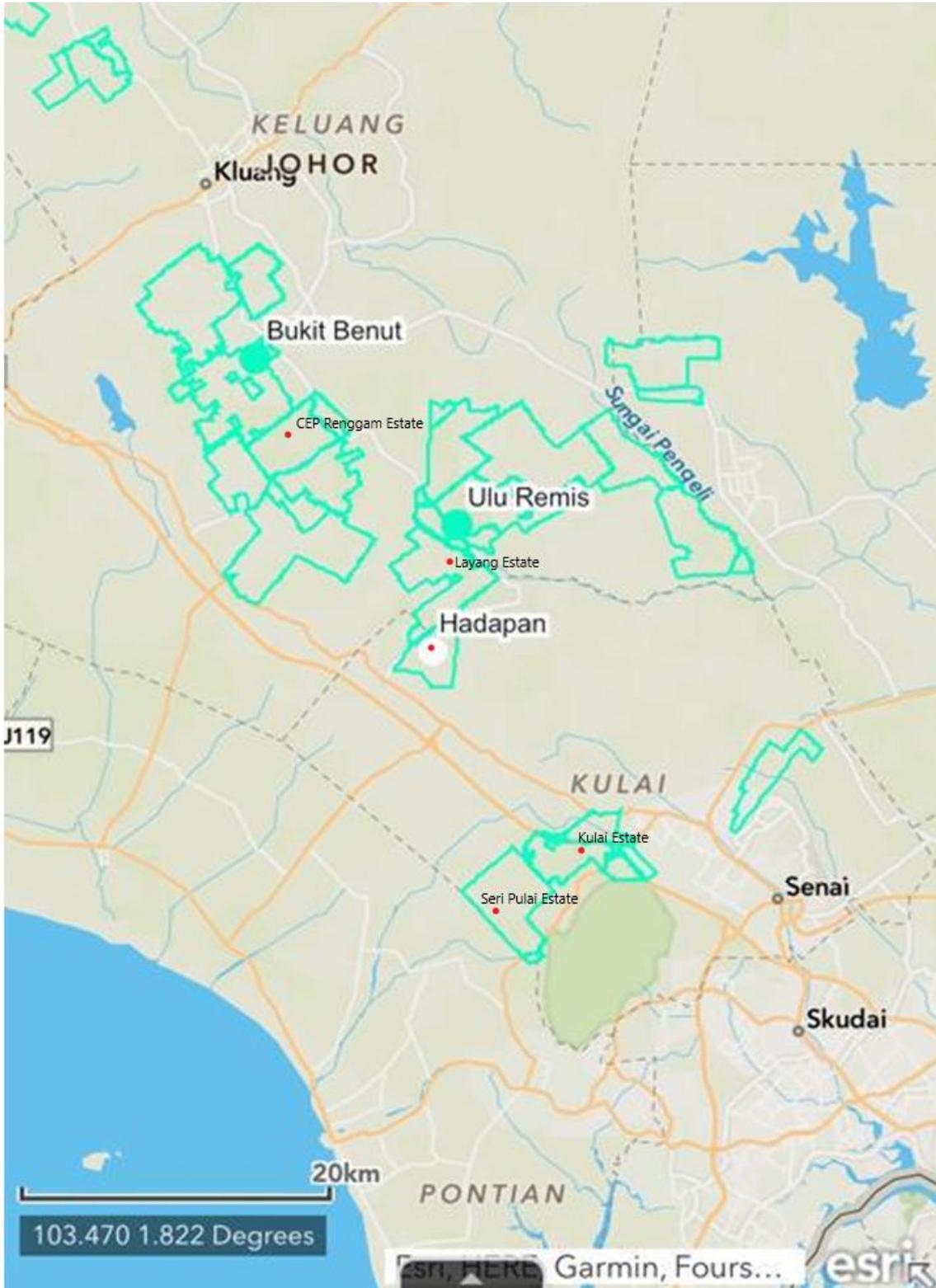
| Emissions | tCO ₂ e |
|--------------------------------|--------------------|
| PK from own mill | 0 |
| PK from other source | 0 |
| Fuel Consumptions | 0 |
| Total Crusher emissions | 0 |

*This mill has no kernel crusher operation.

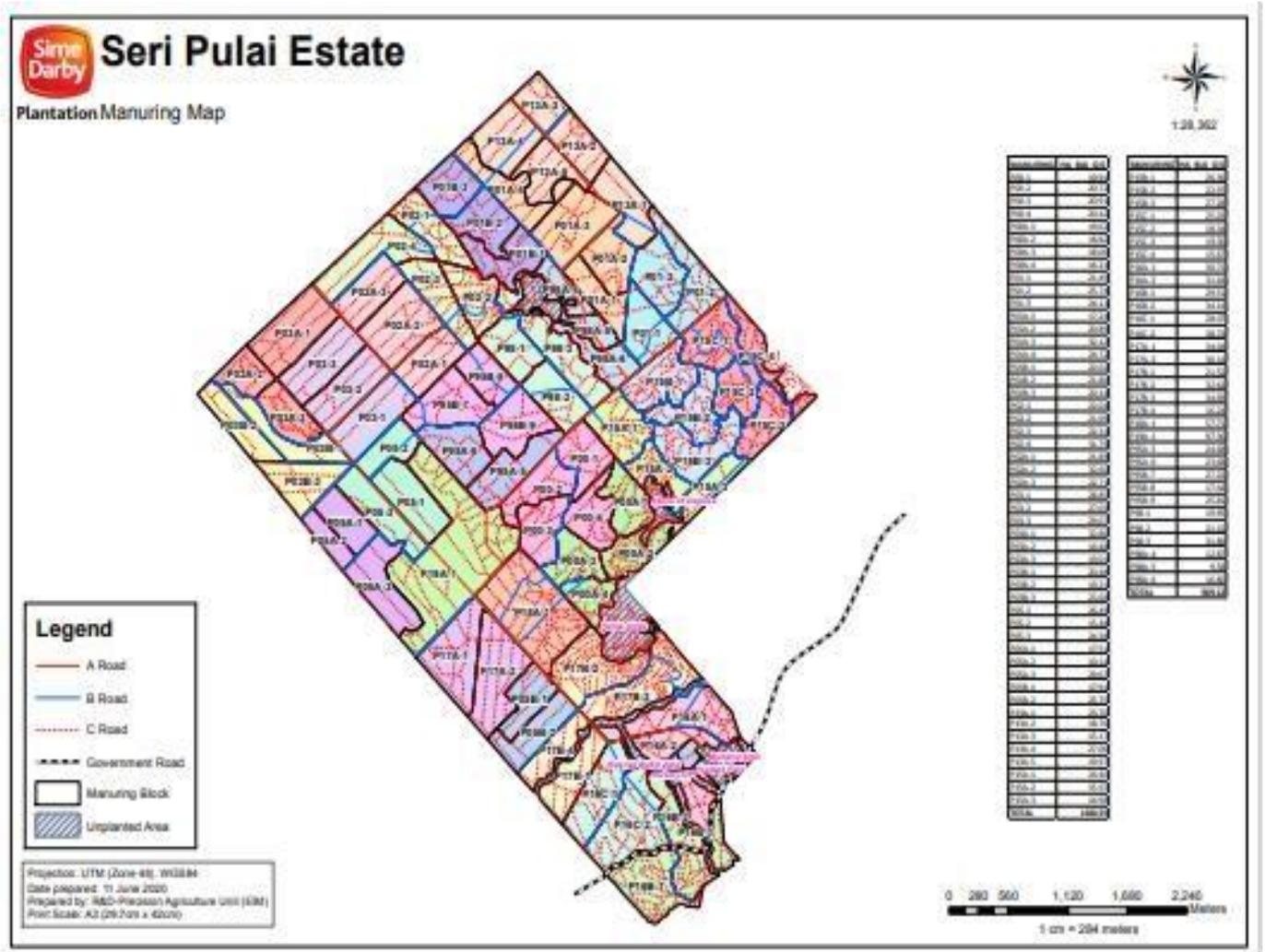
| Palm Oil Mill Effluent (POME) Treatment: | |
|---|-----|
| Divert to Compost (%) | 0 |
| Divert to anaerobic diversion (%) | 100 |

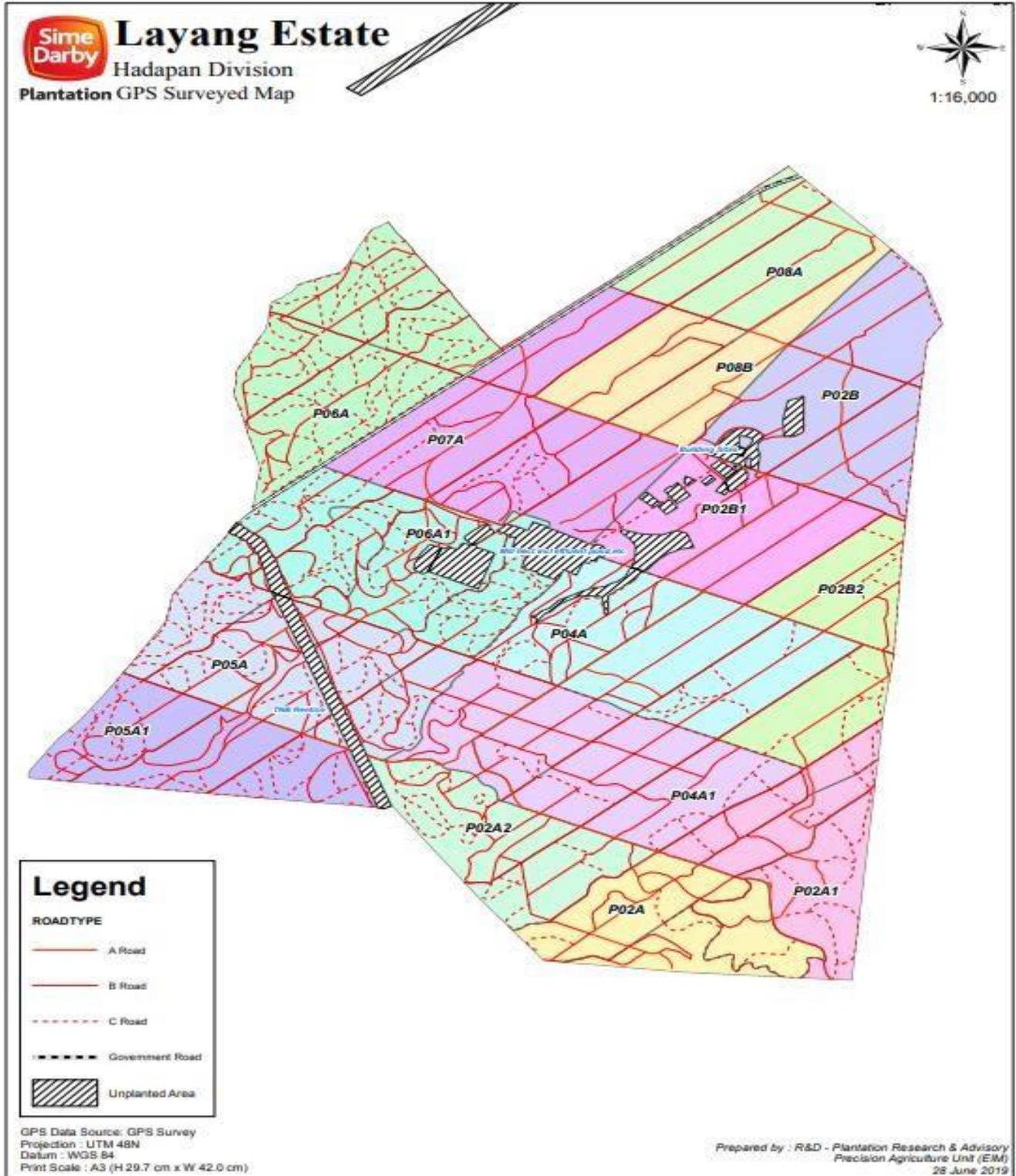
| POME Diverted to Anaerobic Digestion: | |
|--|----|
| Divert to anaerobic pond (%) | 5 |
| Divert to methane captured (flaring) (%) | 3 |
| Divert to methane captured (energy generation) (%) | 92 |

Appendix C: Location Map of Certification Unit and Supply bases

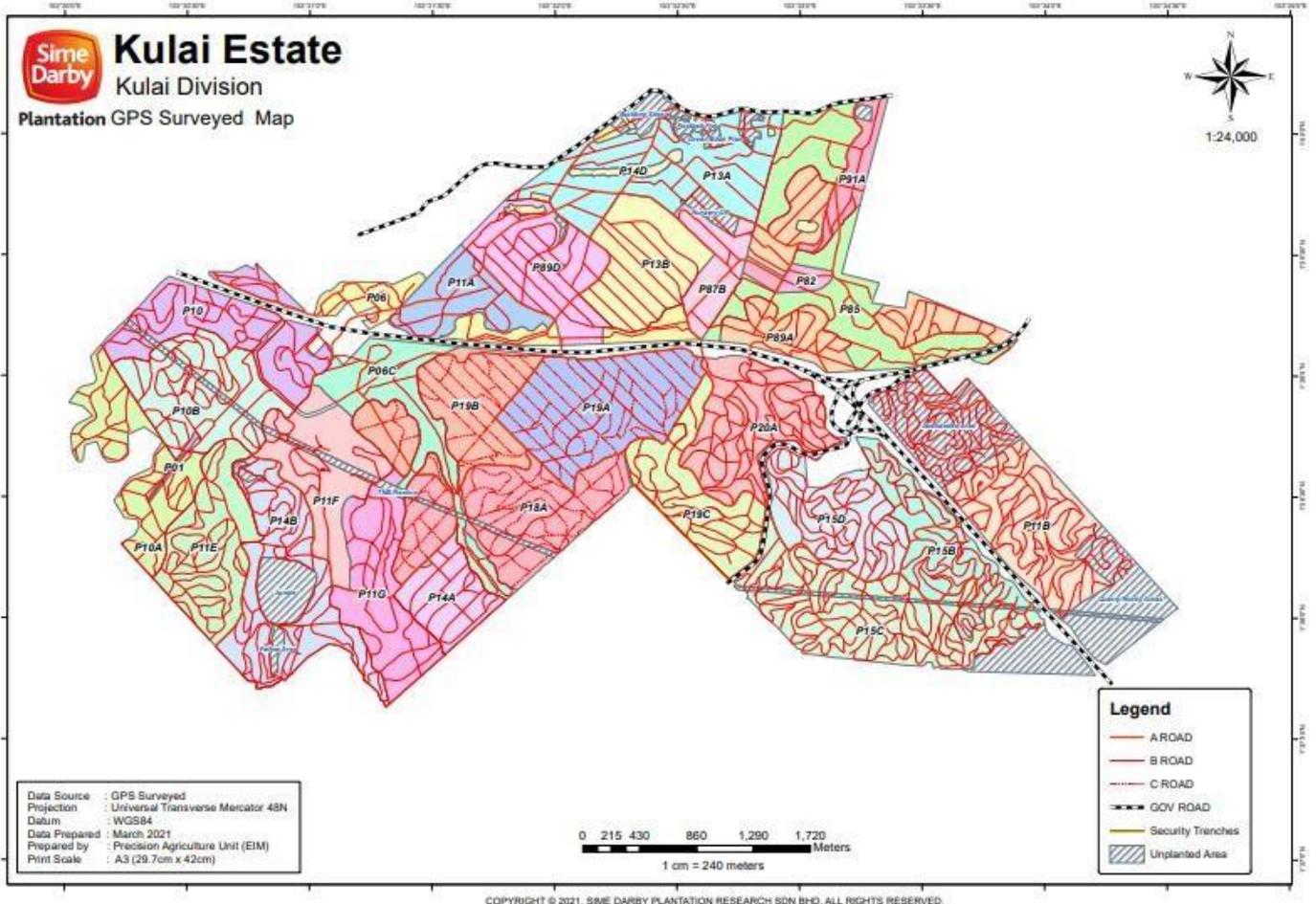


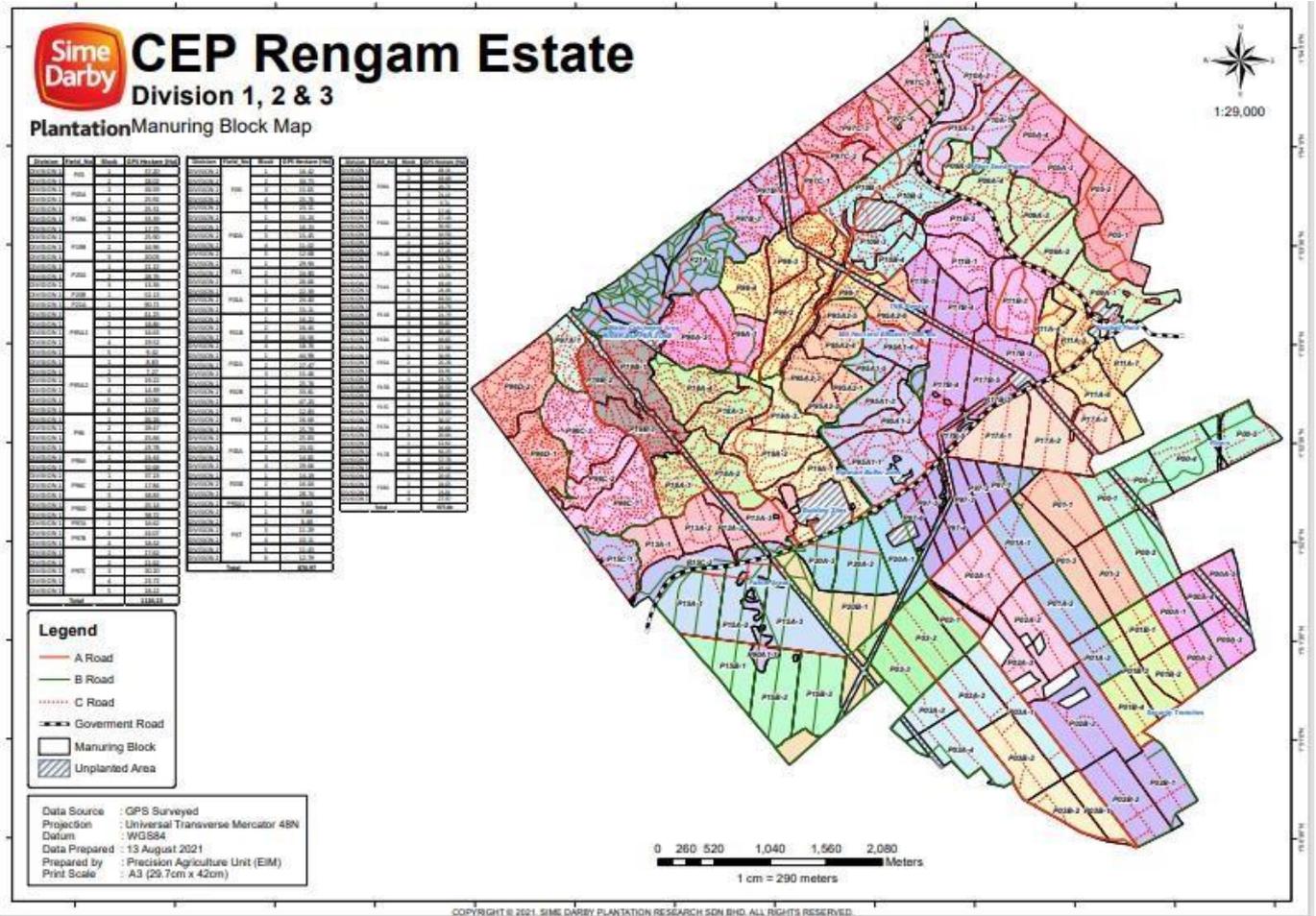
Appendix D: Estate Field Map





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Appendix F: List of Abbreviations

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