

**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 11, Main Block, Plantation Tower, Oasis Ara Damansara, 50490 Kuala Lumpur, Malaysia
Certification Unit: Strategic Operating Unit (SOU 10) - Bukit Puteri Palm Oil Mill Location of Certification Unit: Bukit Puteri Palm Oil Mill, 27200, Kuala Lipis, Pahang, Malaysia
Date of Final Report: 10 July 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 11, Main Block, Plantation Tower, Oasis Ara Damansara, 50490 Kuala Lumpur, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 10) - Bukit Puteri Palm Oil Mill		
Location / Address	Bukit Puteri Palm Oil Mill, 27200, Kuala Lipis, Pahang, Malaysia		
Website	https://simeedarbyplantation.com/		
Management Representative	Shylaja Devi Vasudevan Nair	E-mail	shylaja.vasudevan@simeedarbyplantation.com
Telephone	+03-78484000	Facsimile	+03-78484363

2. Certification Information			
Certificate Number	RSPO 745403	Certificate Start Date	07/07/2021
Date of First Certification	07/07/2011	Certificate Expiry Date	06/07/2026
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory, and contractual requirements. 		
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 type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	20 tonne/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)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 745405	MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn. Bhd.	26/11/2027
MSPO 745404	MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		26/11/2027
MSPO 745406	MSPO Supply Chain Certification Standard 2018		24/10/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Bukit Puteri Palm Oil Mill	Bukit Puteri Palm Oil Mill, 27200, Kuala Lipis, Pahang, Malaysia	4°12'07.50"N	101°51'46.10"E
Bukit Puteri Estate	Bukit Puteri Estate, 27200, Kuala Lipis, Pahang, Malaysia	4°11'41.20"N	101°53'22.80"E

Note: Address has been updated with additional of Site Name

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Puteri Estate	3,660.82	21.36	160.33	3,842.51	95.27
Total	3,660.82	21.36	160.33	3,842.51	95.27

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Bukit Puteri Estate	473.73	2,317.23	212.32	657.54	3,187.09	473.73
Total (ha)	473.73	2,317.23	212.32	657.54	3,187.09	473.73

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7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jul 2022 – June 2023)	Actual (Apr 2022 – Mar 2023)		Forecast (Jul 2023 – Jun 2024)
		Previous license period (Apr 2022 – Jun 2022)	Current license period (Jul 2022 – Mar 2023)	
Bukit Puteri Estate	69,287.00	8,990.41	26,127.08	53,680.72
Total	69,287.00	*35,117.49		53,680.72

Note: *the forecast yield was verified and confirmed based on Sime Darby 2023 recruitment planning which will reduce harvester to area ratio and increase harvesting rounding, 2022 rain fall pattern and consideration of prime age of the OP.

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jul 2022 – Jun 2023)	Actual (Apr 2022 – Mar 2023)		Forecast (Jul 2023 – Jun 2024)
		Previous license period (Apr 2022 – Jun 2022)	Current license period (Jul 2022 – Mar 2023)	
Kerdau Estate		-	90.87	
Mentakab Estate		-	109.98	
Sg Mai Estate		-	85.46	
Total		286.31		

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Jul 2022 – Jun 2023)	Actual (Apr 2022 – Mar 2023)		Forecast (Jul 2023 – Jun 2024)
		Previous license period (Apr 2022 – Jun 2022)	Current license period (Jul 2022 – Mar 2023)	
Supplier A		398.83	1,021.33	
Supplier B		3,456.37	12,630.65	
Supplier C		56.89	488.83	
Supplier D		907.44	3,416.50	
Supplier E		12.45	41.34	
Supplier F		206.25	1,202.53	
Supplier G		8.68	20.70	
Supplier H		23.81	46.00	
Total		23,938.60		

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Apr 2022	3,070.12	1,614.78	4,684.90
2	May 2022	2,892.87	1,528.83	4,421.70
3	June 2022	3,027.42	1,927.11	4,954.53
4	July 2022	2,839.37	1,779.86	4,619.23
5	Aug 2022	3,230.91	2,021.35	5,252.26
6	Sept 2022	2,891.91	2,081.01	4,972.92
7	Oct 2022	3,500.65	2,384.46	5,885.11
8	Nov 2022	3,659.59	2,156.82	5,816.41
9	Dec 2022	3,617.08	2,036.86	5,653.94
10	Jan 2023	2,414.88	1,804.76	4,219.64
11	Feb 2023	2,151.05	2,209.46	4,360.51
12	Mar 2023	2,107.95	2,393.30	4,501.25
	TOTAL	35,403.80	23,938.60	59,342.40

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10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Jul 2022 – Jun 2023)	Actual (Apr 2022 – Mar 2023)		Forecast (Jul 2023 – Jun 2024)
	Previous license period (Apr 2022 – Jun 2022)	Current license period (Jul 2022 – Mar 2023)	
FFB	FFB		FFB
69,287.00 mt	8,990.41 mt	26,413.39 mt	53,680.72 mt
	TOTAL	*35,403.80	
CPO (OER:20.97%)	CPO (OER:21.30%)		CPO (OER:20.5%)
14,529.48 mt	1,962.00 mt	5,580.74 mt	11,004.55 mt
	TOTAL	*7,542.74	
PK (KER:4.82%)	PK (KER:4.26%)		PK (KER:4.30%)
3,339.63 mt	388.71 mt	1,120.85 mt	2,308.27 mt
	TOTAL	*1,509.56 mt	

Note: Low FFB processed and production resulting to low CPO and PK production due to low crop received supplying estate (Shortage of harvester, Increase of harvesting round, and interference of rainfall pattern). The forecast yield was verified and confirmed based on Sime Darby 2023 recruitment planning which will reduce harvester to area ratio and increase harvesting rounding, 2022 rain fall pattern and consideration of prime age of the OP for FFB sent to the Mill.

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Apr 2022	660.69	133.24
2	May 2022	635.27	124.68
3	June 2022	666.03	130.78
4	July 2022	618.98	104.49
5	Aug 2022	668.15	137.64
6	Sept 2022	609.04	117.41
7	Oct 2022	755.09	135.83
8	Nov 2022	792.67	160.29
9	Dec 2022	751.99	178.68
10	Jan 2023	509.06	117.60
11	Feb 2023	437.53	76.79
12	Mar 2023	438.24	92.13
	TOTAL	7,542.74	1,509.56

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11. Summary of Actual Volume sold					
Current License period (Jul 2022 – Mar 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	0.00	0	0	2,202.89	2,202.89
PK (MT)	1,269.70	0	0	0.00	1,269.70
Credits	-	-	-	-	-
Previous License period (Apr 2022 – June 2022)					
CPO (MT)	312.40	0.00	0.00	1,013.05	1,325.45
PK (MT)	601.68	0.00	0.00	0.00	601.68
Credits	-	-	-	-	-

Note: The total PK sold was 1,871.38MT. However as per the actual production, there is only 1,509.56MT PK. Nonconformity has been raised as per 3.3. Details of non-conformities with reference number 2331174-202304-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	Buyer A	TR-077a1c26-b393 TR-f55dfbb6-9404	312.40	-
2	Buyer B	TR-af54c741-01e5 TR-923a3648-1f3a TR-0e278976-ce9b TR-1a453ecc-e338 TR-701a71ba-de2d TR-7c359553-e941 TR-2e31b963-9af3 TR-2c04c5f4-8937 TR-679589d3-309b TR-af25a1f2-f66a TR-cb0ecd6e-4ef4 TR-e31f3985-c55c TR-b8f6cbec-0b9f TR-2e65649a-a979 TR-7062cdcb-edb7 TR-c22a90f0-83b1 TR-30ab919e-99fb TR-bdc7116e-248a	-	1,871.38
TOTAL			312.40	1,871.38

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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)
N/A	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	Buyer C	3,215.94	0.00
TOTAL		3,215.94	0.00

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
N/A	N/A	N/A	N/A
TOTAL			N/A

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

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)
N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A		N/A	N/A	N/A	N/A	N/A

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

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)
	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A	N/A	N/A	N/A
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.
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)
Website: www.bsigroup.com

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **04/04/2023-07/04/2023**. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **31/05/2023**. The audit programs are included in Section 2.3.

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

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

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

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

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

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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 (RC 2)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Bukit Puteri Palm Oil Mill	✓	✓	✓	✓	✓
Bukit Puteri Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: April 4, 2024 - April 7, 2024

Total Number of Mandays: 9.5 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Nor Halis Abu Zar (NHA)	Team Leader	<p>Education: Bachelor of Science, Plantation Technology and Management, graduated from Universiti Teknologi Mara in 2012.</p> <p>Work Experience: He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day-to-day plantation operations. In his career at Kulim Plantation. He had accumulated more than 6 years of sustainability implementation experience. He is a qualified Lead Auditor for MS 2530:2013 and has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p>Training attended: He has completed ISO IMS 9001 and 14001 Lead Auditor Course MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor Course, CQI and IRCA Certified ISO 45001 Lead Auditor Course, ISO 9001:2015 Lead Auditor Course, MSPO SCCS Auditor and SMETA Requirement Training and RSPO Independent Smallholder (IHS) Auditor Training.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English</p> <p>Aspect covered in this audit: Economic management plan, mill best practices, estate best practices, natural and biodiversity conservation, Waste management, GHG, HCV, and RSPO supply chain requirements.</p>
Mohamed Zainal Hidhir Abidin (MHZ)	Team Member	<p>Education: Bachelor Degree in Chemical Engineering, National University of Malaysia</p> <p>Work Experience: He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. Other than that, have experience as Auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO since 2012</p>

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		<p>Training attended: He has completed ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014, Endorsed RSPO SCCS Lead Auditor Course, SMETA Auditor training, RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher training.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit: Policy and commitment, Social requirements, contract agreement, human rights, workers’ welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue and RSPO supply chain requirements.</p>
Vijay Kanna Pakirisamy (VKP)	Team Member	<p>Education: Holds a Bachelor’s Degree in Agribusiness Science Management with Honours, University Utara Malaysia.</p> <p>Work Experience: He has 10 years’ experience in Oil Palm Estate Management in leading Oil Palm Companies such as KL Kepong Bhd, IOI Plantations and United Plantations. The last position held was Senior Assistant Manager. His experience includes the day-to-day estate operations and ensures the implementation of RSPO, ISCC and MSPO certification. He has been a sustainable palm oil auditor since 2019.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, Endorsed MSPO Lead Auditor Course, HCV & HCS Introductory Training g and SMETA Requirements Training, RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher training.</p> <p>Language proficiency: Fluent in English, Bahasa Malaysia, Tamil.</p> <p>Aspect covered in this audit: Occupation Health Safety requirement, HIRARC, Environment responsibility, training, environment impact assessment and management plan.</p>

Accompanying Persons:

Name	Role
Valence Shem	Qualifying Reviewer

2.3 Assessment Plan

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

Date	Time	Subjects	NHA	MHZ	VKP	VSH
Monday 03/04/2023	-	Audit Team Travel from Kuala Lumpur to Star Well Hotel, Kuala Lipis	√	√	√	√
Tuesday, 04/04/2023	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 	√	√	√	-

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Bukit Puteri 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.	√	√	√	-
	12.30 – 13.30	Lunch/ Break	√	√	√	-
	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, 05/04/2023 Bukit Puteri Estate and Bukit Puteri POM	09.00 – 12.30	Continue: 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.)	√	√	√	-
	10.00 – 12.00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)				
	12.30 – 13.30	Lunch/ Break	√	√	√	
	13.30 – 16.30	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. 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.	√	√	√	-
	16.30 – 17.00	Interim Closing briefing.	√	√	√	-

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Date	Time	Subjects	NHA	MHZ	VKP	VSH
Thursday 06/04/2023 Bukit Puteri POM	09.00 - 12.30	Continue: 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. RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	√	√	-
	12.30 - 13.30	Lunch/ Break	√	√	√	-
	13.30 - 16.30	Continue: Lab, weighbridge, and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	√	√	-
	16.30 - 17.00	Interim Closing briefing.	√	√	√	-
Friday 07/04/2023 Bukit Puteri POM	09.00 - 12.00	Continue with unfinished elements: RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	-	-	-
	12.00 - 12.15	Audit Team Discussion and report preparation	√	√	√	-
	12.15 - 13.00	Closing Meeting	√	√	√	-
	-	Audit Team Travel back to Kuala Lumpur	√	√	√	√

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Major NC Close Out

Date	Time	Subjects	NHA
Tuesday 30/05/2023	-	Auditor Travelling	√
Wednesday 31/05/2023 08.30 – 11.30 SOU 10 Bukit Puteri POM & 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 – 12.00	<ul style="list-style-type: none"> Verification on previous Major NC: <ol style="list-style-type: none"> 2331174-202304-M1 2331174-202304-M2 Site observation, workers interview (individual and group session) if necessary Document review – implemented evidence 	√
	12.00 – 12.30	Closing Meeting	√
	12.30	Auditor travelling	√

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>Generally, all estates and mills excepted stated below or in the TBP are 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, 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 and on 01/10/2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently Sime Darby Plantation Berhad have no control in the management. As per reply from Deputy Director of Compliance, RSPO Secretariat on 26/01/2022, for RSPO membership date before 1st July 2018, the new TBP is before 30th June 2023. Since SDP TBP is within June 2023, no approval is required from RSPO Secretariat. This is confirm with the representative from Sime Darby as per email dated 11/05/2023 and during audit.</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>

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<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 (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Yes. 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. 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 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>Complied</p>
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>Although there lapses has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as these 2 assets were disposed.</p>	<p>Complied</p>
<p>Un-Certified Units or Holdings</p>		

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<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p>	<p>There were 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 awaiting to receive land titles at the Indonesia management units</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification</p> <ol style="list-style-type: none"> 1. NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyplantation-berhad-nbpol-poliamba-limited 2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-a-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 	<p>Complied</p>

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	<p>9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-j-estate</p> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-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>As per Internal Audit conducted in 27 – 28/06/2022, 01 – 06/08/2022 and 23/10/2022, all issues of are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C.</p> <p>It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about</p>	<p>Complied</p>

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	land conflict has been lodge by stakeholders as at the day of audit.	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	<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>As per Internal Audit conducted in 27 – 28/06/2022, 01 – 06/08/2022 and 23/10/2022, no labor dispute issues were reported.</p> <p>It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about labour dispute has been lodge by stakeholders as at the day of audit.</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>	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	<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>As per Internal Audit conducted in 27 – 28/06/2022, 01 – 06/08/2022 and 23/10/2022, the legal compliance is being addressed through measures consistent with the requirements of RSPO P&C.</p> <p>It has been further verified through email from HQ on List Of legal Register that has been submitted to all units under Sime Darby Plantation Berhad. RSPO complaint tracker, Internet (Media) which there is no complaint about labour dispute has been lodge by stakeholders as at the day of audit.</p>	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	<p>Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue are mainly awaiting for Land Titles. The last audit was conducted 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.</p>	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	<p>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.</p>	Complied

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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
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3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	Not applicable.	Not Applicable

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 -2 Estate		1.531667	100.643889	4.922	Certified	Not Applicable	23-Nov-10	19-20 July 2021
		Manggala -3 Estate		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
Teluk Siak	Indonesia	Teluk Siak Estate	Siak District - Riau	0.585833	101.616944	3,321.20	Certified	Not Applicable	11-Oct-11	19-20 July 2021
		Pinang Sebatang Estate		0.543056	101.575000	3,799.21	Certified	Not Applicable	11-Oct-11	19-20 July 2021
		Aneka Persada Estate		0.626389	101.655833	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	4.708333	97.840556	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	4.696944	97.837222	3,460.06	Certified	Not Applicable	3-May-13	19-20 July 2021
		Blang Simpo -2 Estate		4.685000	97.817500	2,677.83	Certified	Not Applicable	3-May-13	19-20 July 2021
		Tamiang (PT PPP) Estate		4.306667	98.026944	1,451.99	Certified	Not Applicable	3-May-13	19-20 July 2021
		Batang Ara (PT PSK) Estate		4.290000	98.013333	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	103.588889	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
		Nusa Lestari Estate		0.185278	103.568056	3,456.74	Certified	Not Applicable	11-Oct-11	19-20 July 2021
		Nusa Perkasa Estate		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
		Rotan Semelur Estate		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
		Sungai Pinang Estate		-2.986944	103.406944	Land legalisation process for 308.35 ha (Div 1 Bukit Pinang & Div 3 Sungai Pinang) is still in process.	Not Certified	Plan on June 2023		19-20 July 2021
		Bukit Pinang Estate		-2.987222	103.405556	3,138.58	Certified	Not Applicable	11-Sep-12	19-20 July 2021
		Bukit Pinang Estate		-2.987222	103.405556	Land legalisation process for 308.35 ha (Div 1 Bukit Pinang & Div 3 Sungai	Not Certified	Plan on June 2023		19-20 July 2021

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						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 Estate		-1.794167	103.799444	Total Areas of Divison 1 and 2 (1,796.19 ha) HGU still in process.	Not Certified	Plan on June 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
Rantau Panjang	Indonesia	Rantau Panjang Estate	Musi Banyuasin District - South Sumatera	-2.922222	103.745278	2,679.74	Certified	Not Applicable	16-Mar-12	19-20 July 2021
		Bumi Ayu Estate		-2.896944	103.676944	2,960.98	Certified	Not Applicable	16-Mar-12	19-20 July 2021
		Karang Ringin Napal Estate		-2.859722	103.646944	4,359.74	Certified	Not Applicable	16-Mar-12	19-20 July 2021
		Mangun Jaya Estate		-2.853056	103.571111	139.45	Certified	Not Applicable	16-Mar-12	19-20 July 2021
		Sungai Jernih Estate		-2.979833	103.803500	851.57 ha under legalization process (proses Kadastral)	Not Certified	Plan on June 2023		19-20 July 2021
Angsana	Indonesia	Angsana Mill	Tanah Bumbu District – South Kalimantan	-3.613611	115.610556	15,151.19	Certified	Not Applicable	6-Jul-11	19-20 July 2021
Angsana	Indonesia	Angsana Estate	Tanah Bumbu District – South Kalimantan	-3.532222	115.669722	3,250.06	Certified	Not Applicable	6-Jul-11	19-20 July 2021
		Gunung Sari Estate		-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

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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
		Pantai bonati Estate		-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 Kemas Estate		-3.530000	116.183333	3,511.36	Certified	Not Applicable	5-Jul-11	19-20 July 2021
		Laut Timur Estate		-3.596944	116.205000	3,207.28	Certified	Not Applicable	5-Jul-11	19-20 July 2021
		Pantai Timur Estate		-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
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
		Matalok Estate		-2.445556	116.111944	3,082.00	Certified	Not Applicable	30-Dec-11	19-20 July 2021
		Selabak Estate (PT SAA)		-2.442222	116.208056	3,757.67	Certified	Not Applicable	16-Mar-12	19-20 July 2021
		Randi Estate (PT SAA)		-2.438889	116.208611	2,882.98	Certified	Not Applicable	16-Mar-12	19-20 July 2021
		Sangkoh Estate (PT SAA)		-2.470556	116.237500	3,789.34	Certified	Not Applicable	16-Mar-12	19-20 July 2021
		Lanting Estate (PT LMR)		-2.463611	116.283611	3,249.27	Certified	Not Applicable	16-Mar-12	19-20 July 2021

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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
		Sekayu Estate		-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
		Bakau Estate		-2.420556	116.328333	5,342.14	Certified	Not Applicable	16-Mar-12	19-20 July 2021
		Sungai Cengal Estate		-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
		Binturung Estate		-2.440833	116.442222	4,072.01	Certified	Not Applicable	16-Mar-12	19-20 July 2021
		Rampa Estate		-2.452500	116.436389	3,656.20	Certified	Not Applicable	16-Mar-12	19-20 July 2021
		Sesulung Estate		-2.494444	116.510556	4,578.46	Certified	Not Applicable	16-Mar-12	19-20 July 2021
Sekunyir	Indonesia	Sekunyir Mill	Seruyan and West Kotawaringin District – Central Kalimantan	-2.444722	112.006944	7,734.59	Certified	Not Applicable	23-Nov-10	19-20 July 2021
Sekunyir	Indonesia	Sekunyir Estate	Seruyan and West Kotawaringin District – Central Kalimantan	-2.446667	112.008889	3,555.19	Certified	Not Applicable	23-Nov-10	19-20 July 2021
		Seruyan Estate		-2.407778	112.068056	4,179.40	Certified	Not Applicable	23-Nov-10	19-20 July 2021
Sukamandang	Indonesia	Sukamandang Mill	Seruyan and East Kotawaringin District – Central Kalimantan	-2.057778	112.316944	14,779.92	Certified	Not Applicable	5-Jul-11	19-20 July 2021
Sukamandang	Indonesia	Sukamandang Estate		-2.065556	112.313333	3,936.56	Certified	Not Applicable	5-Jul-11	19-20 July 2021

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		Sapiri Estate	Seruyan and East Kotawaringin District – Central Kalimantan	-2.023889	112.347778	3,530.90	Certified	Not Applicable	5-Jul-11	19-20 July 2021
		Baras Danum Estate		-2.080000	112.381111	3,664.60	Certified	Not Applicable	5-Jul-11	19-20 July 2021
		Kuala Kuayan Estate		-2.079444	112.352778	3,647.86	Certified	Not Applicable	5-Jul-11	19-20 July 2021
Pematang	Indonesia	Pematang Mill	Seruyan and East Kotawaringin District – Central Kalimantan	-2.148333	112.292778	16,601.66	Certified	Not Applicable	5-Jul-11	19-20 July 2021
Pematang	Indonesia	Pematang Estate	Seruyan and East Kotawaringin District – Central Kalimantan	-2.158056	112.290556	3,857.91	Certified	Not Applicable	5-Jul-11	19-20 July 2021
		Kawan Batu Estate		-2.161111	112.385278	4,400.00	Certified	Not Applicable	5-Jul-11	19-20 July 2021
		Hatantiring Estate		-2.116111	112.293333	3,811.00	Certified	Not Applicable	5-Jul-11	19-20 July 2021
		Batang Garing Estate		-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
		Awatan Estate		-2.215278	110.681944	3,476.79	Certified	Not Applicable	3-Jul-14	19-20 July 2021
		Pelanjau Estate (PT BAL)		-2.227778	110.621944	1,002.79	Certified	Not Applicable	3-Jul-19	19-20 July 2021
		Karya Palma Estate		-2.170592	110.726528	Pending confirmation from BPN on HGU document	Not Certified	Plan on June 2023		19-20 July 2021
		Beturus Estate (PT BAL)		-2.174444	110.659722	HGU was obtained however BPN never release the HGU to the company	Not Certified	Plan on June 2023		19-20 July 2021

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Bukit Ajong	Indonesia	Bukit Ajong Mill	Sanggau District –West Kalimantan	0.269444	110.482778	11,498.82	Certified	Not Applicable	18-Oct-10	19-20 July 2021
Bukit Ajong	Indonesia	West Estate	Sanggau District –West Kalimantan	0.271667	110.405833	4,562.34	Certified	Not Applicable	18-Oct-10	19-20 July 2021
		East Estate		0.256111	110.502500	2,665.48	Certified	Not Applicable	18-Oct-10	19-20 July 2021
		East/Sei Mawang Estate		0.155224	110.532656	Land legalization process for East Estate for 6,123.7 ha under process	Not Certified	Plan on June 2023		19-20 July 2021
Sg. Dingin	Malaysia	Sungai Dingin Oil Mill	Karangan, Kedah	5.394734	100.710604	19,517.17	Certified	Not Applicable	12-Aug-10	19-20 July 2021
Sg. Dingin	Malaysia	Anak Kulim Estate	Karangan, Kedah	5.301731	100.589053	1,523.35	Certified	Not Applicable	12-Aug-10	19-20 July 2021
		Sungai Dingin Estate		5.374539	100.723497	4,244.03	Certified	Not Applicable	12-Aug-10	19-20 July 2021
		Somme Estate		5.247043	100.624650	941.56	Certified	Not Applicable	12-Aug-10	19-20 July 2021
		Bukit Selarong Estate		5.505948	100.608351	3,896.17	Certified	Not Applicable	12-Aug-10	19-20 July 2021
		Padang Buluh Estate		5.673433	100.543599	4,008.47	Certified	Not Applicable	12-Aug-10	19-20 July 2021
		Bukit Hijau Estate		5.600325	100.717128	2,725.00	Certified	Not Applicable	12-Aug-10	19-20 July 2021
		Jentayu Estate		5.772915	100.587191	2,178.59	Certified	Not Applicable	12-Aug-10	19-20 July 2021
Chersonese	Malaysia	Chersonese Oil Mill	Kuala Kurau, Perak	4.978457	100.461902	11,099.36	Certified	Not Applicable	5-Oct-11	19-20 July 2021
Chersonese	Malaysia	Chersonese Estate	Kuala Kurau, Perak	4.987886	100.456169	3,293.72	Certified	Not Applicable	5-Oct-11	19-20 July 2021
		Kalumpong Estate		4.957656	100.566418	2,716.80	Certified	Not Applicable	5-Oct-11	19-20 July 2021
		Tali Ayer Estate		5.081477	100.523402	3,756.10	Certified	Not Applicable	5-Oct-11	19-20 July 2021
		Holyrood Estate		5.139587	100.712109	1,332.74	Certified	Not Applicable	5-Oct-11	19-20 July 2021
Elphil	Malaysia	Elphil Oil Mill	Sg Siput, Perak	4.890787	101.092768	6,814.60	Certified	Not Applicable	18-Jun-11	19-20 July 2021
Elphil	Malaysia	Kamuning Estate	Sg Siput, Perak	4.850552	101.031803	3,888.43	Certified	Not Applicable	18-Jun-11	19-20 July 2021

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		Elphil Estate		4.848728	101.102094	1,865.43	Certified	Not Applicable	18-Jun-11	19-20 July 2021
		Kinta Kellas Estate		4.459869	101.087714	1,060.74	Certified	Not Applicable	18-Jun-11	19-20 July 2021
Flemington	Malaysia	Flemington Oil Mill	Teluk Intan, Perak	3.928662	100.856590	11,226.23	Certified	Not Applicable	5-Oct-11	19-20 July 2021
Flemington	Malaysia	Flemington Estate	Teluk Intan, Perak	3.901745	100.905976	1,906.84	Certified	Not Applicable	5-Oct-11	19-20 July 2021
		Bagan Datoh Estate		3.987867	100.815889	3,781.86	Certified	Not Applicable	5-Oct-11	19-20 July 2021
		Sabak Bernam Estate		3.754999	101.014455	2,511.79	Certified	Not Applicable	5-Oct-11	19-20 July 2021
		Sg. Samak Estate		3.774142	101.158366	3,025.74	Certified	Not Applicable	5-Oct-11	19-20 July 2021
Seri Intan/Selaba	Malaysia	Seri Intan Oil Mill	Teluk Intan, Perak	3.969097	100.985458	14,474.29	Certified	Not Applicable	3-Mar-11	19-20 July 2021
Seri Intan/Selaba	Malaysia	Selaba Oil Mill	Teluk Intan, Perak	3.989699	101.081201	1,549.75	Certified	Not Applicable	3-Mar-11	19-20 July 2021
Seri Intan/Selaba	Malaysia	Seri Intan (+ Selaba) Estate	Teluk Intan, Perak	3.962735	101.016490	4,013.16	Certified	Not Applicable	3-Mar-11	19-20 July 2021
		Sabrang Estate		4.011192	100.960478	3,945.23	Certified	Not Applicable	3-Mar-11	19-20 July 2021
		Sogomana Estate		4.387616	100.701262	2,214.08	Certified	Not Applicable	3-Mar-11	19-20 July 2021
		Sg. Wangi Estate		4.280812	100.743135	2,226.66	Certified	Not Applicable	3-Mar-11	19-20 July 2021
		Bikam Estate		4.017065	101.317302	2,075.16	Certified	Not Applicable	3-Mar-11	19-20 July 2021
		Cluny (+ Bedford) Estate		3.857921	101.434059	1,549.75	Certified	Not Applicable	3-Mar-11	19-20 July 2021
Tennamaram	Malaysia	Tennamaram Oil Mill	Bestari Jaya, Selangor	3.396501	101.418491	10,706.26	Certified	Not Applicable	3-Mar-11	19-20 July 2021
Tennamaram	Malaysia	Tennamaram Estate	Bestari Jaya, Selangor	3.413960	101.416127	1,981.60	Certified	Not Applicable	3-Mar-11	19-20 July 2021
		Sungai Buluh Estate		3.318358	101.327095	5,152.22	Certified	Not Applicable	3-Mar-11	19-20 July 2021
		Bukit Talang Estate		3.401577	101.303102	3,572.44	Certified	Not Applicable	3-Mar-11	19-20 July 2021
Bkt Kerayong	Malaysia	Bukit Kerayong Oil Mill	Kapar, Selangor	3.188046	101.372775	6,346.90	Certified	Not Applicable	15-Apr-11	19-20 July 2021
Bkt Kerayong	Malaysia	Bukit Kerayong Estate	Kapar, Selangor	3.165246	101.371079	2,699.28	Certified	Not Applicable	15-Apr-11	19-20 July 2021

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		Bukit Cheraka Estate		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
		Sepang Estate	Sepang, Selangor	2.692067	101.723500	2,092.28	Certified	Not Applicable	19-May-10	19-20 July 2021
		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
Kerdu	Malaysia	Kerdu Oil Mill	Temerloh, Pahang	3.569692	102.278807	13,781.50	Certified	Not Applicable	7-Jul-11	19-20 July 2021
Kerdu	Malaysia	Kerdu Estate	Temerloh, Pahang	3.582726	102.314266	5,683.04	Certified	Not Applicable	7-Jul-11	19-20 July 2021
		Mentakab Estate		3.488212	102.243800	3,266.49	Certified	Not Applicable	7-Jul-11	19-20 July 2021
		Chenor Estate		3.784343	102.615444	2,834.98	Certified	Not Applicable	7-Jul-11	19-20 July 2021
		Sg Mai Estate		3.847749	102.341727	1,996.99	Certified	Not Applicable	7-Jul-11	19-20 July 2021
Jabor	Malaysia	Jabor Oil Mill	Kuantan, Pahang	3.960000	103.310000	2,332.92	Certified	Not Applicable	7-Jul-11	19-20 July 2021
Jabor	Malaysia	Jabor Estate	Kuantan, Pahang	3.958168	103.299484	2,332.92	Certified	Not Applicable	7-Jul-11	19-20 July 2021
Labu	Malaysia	Labu Oil Mill	Nilai, Negeri Sembilan	2.750730	101.805038	4,529.72	Certified	Not Applicable	30-Dec-11	19-20 July 2021
Labu	Malaysia	Labu Estate	Nilai, Negeri Sembilan	2.737380	101.816051	4,529.72	Certified	Not Applicable	30-Dec-11	19-20 July 2021
Tanah Merah	Malaysia	Tanah Merah Oil Mill	Port Dickson, Negeri Sembilan	2.654368	101.792488	6,203.87	Certified	Not Applicable	19-May-10	19-20 July 2021
Tanah Merah	Malaysia	Tanah Merah Estate	Port Dickson, Negeri Sembilan	2.634776	101.798120	4,341.73	Certified	Not Applicable	19-May-10	19-20 July 2021
		Bukit Pelandok Estate		2.690570	101.773393	1,862.14	Certified	Not Applicable	19-May-10	19-20 July 2021

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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
		Sengkang Estate		2.447583	101.962703	2,831.51	Certified	Not Applicable	18-Feb-14	19-20 July 2021
		Bradwall Estate		2.564010	101.938966	3,828.34	Certified	Not Applicable	18-Feb-14	19-20 July 2021
		PD Lukut Estate		2.535525	101.850486	1,523.79	Certified	Not Applicable	18-Feb-14	19-20 July 2021
		Tampin Linggi Estate		2.523442	101.995888	2,106.71	Certified	Not Applicable	18-Feb-14	19-20 July 2021
		Sg. Bahru Estate		2.439865	102.084904	1,427.31	Certified	Not Applicable	18-Feb-14	19-20 July 2021
		Salak Estate		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
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
		Sg. Senarut Estate + Sg Gemas Estate		2.556845	102.691147	2,958.38	Certified	Not Applicable	7-Jul-11	19-20 July 2021
		Kok Foh Estate		2.818025	102.516297	2,275.84	Certified	Not Applicable	7-Jul-11	19-20 July 2021
		Bukit Pilah Estate		2.718295	102.527980	3,667.31	Certified	Not Applicable	7-Jul-11	19-20 July 2021
		St. Helier Estate		2.779462	102.374345	1,992.65	Certified	Not Applicable	7-Jul-11	19-20 July 2021
		Sungai Sabaling Estate		2.844046	102.474445	1,321.35	Certified	Not Applicable	7-Jul-11	19-20 July 2021
		Pertang Estate		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
		Tangkah Estate		2.292917	102.602549	2,537.78	Certified	Not Applicable	20-May-10	19-20 July 2021
		Kemuning Estate		2.431024	102.297339	2,671.05	Certified	Not Applicable	20-May-10	19-20 July 2021
		Serkam Estate		2.250557	102.394318	2,114.23	Certified	Not Applicable	20-May-10	19-20 July 2021

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Diamond Jubilee	Malaysia	Diamond Jubilee Palm Oil Mill	Jasin, Melaka	2.324247	102.482843	7,356.19	Certified	Not Applicable	5-Oct-11	19-20 July 2021
Diamond Jubilee	Malaysia	Diamond Jubilee Estate	Jasin, Melaka	2.307499	102.439884	2,836.19	Certified	Not Applicable	5-Oct-11	19-20 July 2021
		Bukit Asahan Estate		2.417485	102.550615	3,072.18	Certified	Not Applicable	5-Oct-11	19-20 July 2021
		Welch Estate		2.459303	102.656758	1,447.82	Certified	Not Applicable	5-Oct-11	19-20 July 2021
Pagoh	Malaysia	Pagoh Oil Mill	Muar, Johor	2.077708	102.719062	7,418.59	Certified	Not Applicable	28-Jan-14	19-20 July 2021
Pagoh	Malaysia	Pagoh Estate	Muar, Johor	2.078652	102.700463	2,325.93	Certified	Not Applicable	28-Jan-14	19-20 July 2021
		Lanadron Estate		2.199715	102.744380	1,964.44	Certified	Not Applicable	28-Jan-14	19-20 July 2021
		Pengkalan Bukit Estate		2.126414	102.772148	3,128.22	Certified	Not Applicable	28-Jan-14	19-20 July 2021
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
		Sg. Simpang Kiri Estate		2.117737	102.990732	2,371.66	Certified	Not Applicable	18-Nov-10	19-20 July 2021
		North Labis Estate		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
		Kempas Klebang Estate		2.217905	103.160775	2,473.06	Certified	Not Applicable	19-May-10	19-20 July 2021
		Bukit Paloh Estate		2.155149	103.180279	3,390.90	Certified	Not Applicable	19-May-10	19-20 July 2021
		Yong Peng Estate		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
Bukit Benut	Malaysia	Bukit Benut Estate	Kluang, Johor	1.910217	103.336262	2,799.78	Certified	Not Applicable	5-Oct-11	19-20 July 2021
		Lambak Elaeis Estate		1.965476	103.319840	3,740.16	Certified	Not Applicable	5-Oct-11	19-20 July 2021
		CEP Nyior Estate		2.090638	103.248932	1,955.19	Certified	Not Applicable	5-Oct-11	19-20 July 2021

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Ulu Remis	Malaysia	Ulu Remis Oil Mill	Layang-layang, Johor	1.834433	103.462750	17,115.58	Certified	Not Applicable	11-Apr-11	19-20 July 2021
Ulu Remis	Malaysia	Ulu Remis Estate	Layang-layang, Johor	1.842329	103.479604	2,598.25	Certified	Not Applicable	11-Apr-11	19-20 July 2021
		Cenas Estate		1.926143	103.580014	1,974.06	Certified	Not Applicable	11-Apr-11	19-20 July 2021
		Bukit Badak Estate		1.873353	103.506986	3,234.25	Certified	Not Applicable	11-Apr-11	19-20 July 2021
		Tun Dr. Ismail Estate		1.832710	103.359779	4,271.44	Certified	Not Applicable	11-Apr-11	19-20 July 2021
		Pekan Estate		1.846603	103.583208	3,258.70	Certified	Not Applicable	11-Apr-11	19-20 July 2021
		Sembrong Estate		1.878696	103.459400	1,778.88	Certified	Not Applicable	11-Apr-11	19-20 July 2021
Hadapan	Malaysia	Hadapan Oil Mill	Layang-layang, Johor	1.762310	103.448013	11,371.82	Certified	Not Applicable	29-Mar-11	19-20 July 2021
Hadapan	Malaysia	Sri Pulai Estate	Layang-layang, Johor	1.617621	103.493465	2,049.87	Certified	Not Applicable	29-Mar-11	19-20 July 2021
		Kulai Estate		1.661084	103.570639	3,023.42	Certified	Not Applicable	29-Mar-11	19-20 July 2021
		Layang Estate		1.788781	103.451095	3,258.90	Certified	Not Applicable	29-Mar-11	19-20 July 2021
		CEP Renggam Estate		1.874883	103.377487	3,039.63	Certified	Not Applicable	29-Mar-11	19-20 July 2021
Sandakan Bay	Malaysia	Sandakan Bay Oil Mill	Sandakan, Sabah	5.640834	118.166631	16,764.34	Certified	Not Applicable	1-Oct-08	19-20 July 2021
Sandakan Bay	Malaysia	Tun Tan Siew Sin Estate	Sandakan, Sabah	5.649754	118.188772	3,125.60	Certified	Not Applicable	1-Oct-08	19-20 July 2021
		Tunku Estate		5.695778	118.205194	3,199.05	Certified	Not Applicable	1-Oct-08	19-20 July 2021
		Tigowis Estate		5.745396	118.216785	2,074.02	Certified	Not Applicable	1-Oct-08	19-20 July 2021
		Sentosa Estate		5.599561	118.178923	3,545.54	Certified	Not Applicable	1-Oct-08	19-20 July 2021
		Segaliud Estate		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
		Sapong Estate		5.045466	115.930091	3,149.45	Certified	Not Applicable	21-Jan-11	19-20 July 2021

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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
		Sungang Estate		4.658950	118.121355	3,407.98	Certified	Not Applicable	16-Jan-09	19-20 July 2021
		Tingkeyu Estate		4.716962	118.077638	1,881.08	Certified	Not Applicable	16-Jan-09	19-20 July 2021
		Jeleta Bumi Estate		4.709414	117.977971	3,099.44	Certified	Not Applicable	16-Jan-09	19-20 July 2021
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
		Mostyn Estate		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
		Imam Estate		4.341017	117.894636	3,773.56	Certified	Not Applicable	16-Jan-09	19-20 July 2021
		Tiger Estate		4.409715	117.840613	2,497.86	Certified	Not Applicable	16-Jan-09	19-20 July 2021
		Table Estate		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
		Rasan Estate		3.405057	113.635653	3,454.00	Certified	Not Applicable	30-Dec-11	19-20 July 2021
		Belian Estate		3.369111	113.560310	2,847.00	Certified	Not Applicable	30-Dec-11	19-20 July 2021
		Kelida Estate		3.364892	113.624465	2,460.00	Certified	Not Applicable	30-Dec-11	19-20 July 2021
		Lavang (Special) Estate		3.400634	113.593633	included under Lavang Estate Ha	Certified	Not Applicable	30-Dec-11	19-20 July 2021
		Pekaka Estate		3.481090	113.641821	2,626.14	Certified	Not Applicable	30-Dec-11	19-20 July 2021
		Ruai Estate		3.449198	113.624477	2,460.96	Certified	Not Applicable	30-Dec-11	19-20 July 2021

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		Dulang Estate		3.460195	113.677984	2,548.00	Certified	Not Applicable	30-Dec-11	19-20 July 2021
		Charquest Estate		3.490618	113.602270	1,448.71	Certified	Not Applicable	30-Dec-11	19-20 July 2021
		Paroh Estate		3.463913	113.734106	2,627.90	Certified	Not Applicable	30-Dec-11	19-20 July 2021
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
		Samudera Estate		3.502793	113.412122	3,308.60	Certified	Not Applicable	30-Dec-11	19-20 July 2021
		Semarak Estate		3.373453	113.375595	2,248.68	Certified	Not Applicable	30-Dec-11	19-20 July 2021
		Bayu Estate		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
		Sahua Estate		3.462224	113.366926	2,644.00	Certified	Not Applicable	30-Dec-11	19-20 July 2021
		Takau Estate		3.387069	113.329626	2,107.00	Certified	Not Applicable	30-Dec-11	19-20 July 2021
		Damai Estate		3.440639	113.400749	2,287.04	Certified	Not Applicable	30-Dec-11	19-20 July 2021
Guadalcanal Plains Palm Oil Limited (GPPOL)	Solomon Islands	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)	Solomon Islands	Tetere Estate	Guadalcanal Province, Solomon Islands	9.449012	160.218796	2947.79	Certified	Not Applicable	18-Mar-11	19-20 July 2021
		Ngalimbiu Estate		9.463400	160.146900	2498.65	Certified	Not Applicable	18-Mar-11	19-20 July 2021
		Mbalisuna Estate		9.447400	160.255700	2868.47	Certified	Not Applicable	18-Mar-11	19-20 July 2021
		Smallholders – West Zone (83)		9.450278	160.140000	245.50	Certified	Not Applicable	18-Mar-11	19-20 July 2021
		Smallholders – Central Zone (53)		9.460000	160.210000	181.71	Certified	Not Applicable	18-Mar-11	19-20 July 2021

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		Smallholders – MBA East Zone (59)		9.468056	160.253889	180.80	Certified	Not Applicable	18-Mar-11	19-20 July 2021
		Smallholders – MBE East Zone (37)		9.484167	160.322222	102.77	Certified	Not Applicable	18-Mar-11	19-20 July 2021
Milne Bay Estates (MBE)	Papua New Guinea (PNG)	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)	PNG	Giligili Estate	Milne Bay Province, Papua New Guinea	-10.300139	150.358361	1095.47	Certified	Not Applicable	15-Feb-13	19-20 July 2021
		Hagita Estate		-10.310944	150.281028	2450.02	Certified	Not Applicable	15-Feb-13	19-20 July 2021
		Waigani Estate		-10.309389	150.259639	2341.13	Certified	Not Applicable	15-Feb-13	19-20 July 2021
		Sagarai Estate		-10.432861	150.190917	2864.55	Certified	Not Applicable	15-Feb-13	19-20 July 2021
		Padipadi Estate		-10.405083	150.024361	4517.67	Certified	Not Applicable	15-Feb-13	19-20 July 2021
		Mariawatte Estate		-10.405083	149.892333	1680.14	Certified	Not Applicable	15-Feb-13	19-20 July 2021
		Smallholders - East Gurney Estate (259)		From - 10.327639 to -10.290528	From 150.284944 to 150.389556	450.59	Certified	Not Applicable	15-Feb-13	19-20 July 2021
		Smallholders - West Gurney Estate (231)		From - 10.307500 to -10.408056	From 150.284944 to 150.664944	479.13	Certified	Not Applicable	15-Feb-13	19-20 July 2021
		Smallholders - East Sagarai Estate (156)		From - 10.431250 to -10.290530	From 150.269220 to 150.300220	283.93	Certified	Not Applicable	15-Feb-13	19-20 July 2021
Smallholders - West Sagarai Estate (212)	From - 10.450830 to -10.405810	From 150.047890 to 150.047890	345.96	Certified	Not Applicable	15-Feb-13	19-20 July 2021			

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Poliamba (POL)	PNG	Poliamba Oil Mill	New Ireland Province, Papua New Guinea	-2.874720	151.276390	10720.53	Certified	Not Applicable	19-Mar-12	19-20 July 2021
Poliamba (POL)	PNG	Kara Estate	New Ireland Province, Papua New Guinea	From - 2.706390 to -2.811000	From 151.028330 to 151.184970	1032.10	Certified	Not Applicable	19-Mar-12	19-20 July 2021
		Nalik Estate		From - 2.870550 to -2.932500	From 151.214990 to 151.429720	2666.75	Certified	Not Applicable	19-Mar-12	19-20 July 2021
		West Coast Estate		From - 2.813720 to -2.98220	From 151.214990 to 151.292970	627.60	Certified	Not Applicable	19-Mar-12	19-20 July 2021
		Noatsi Estate		From - 2.960550 to -3.109720	From 151.456390 to 151.705280	2064.10	Certified	Not Applicable	19-Mar-12	19-20 July 2021
		Madak Estate		From - 3.143060 to -3.259720	From 151.755830 to 152.041100	1517.11	Certified	Not Applicable	19-Mar-12	19-20 July 2021
		Smallholders -North Division (615)		From - 2.683880 to -2.880000	From 150.950000 to 150.256600	1022.12	Certified	Not Applicable	19-Mar-12	19-20 July 2021
		Smallholders- South Division (866)		From - 2.871100 to -3.188060	From 151.286110 to 151.835500	1257.21	Certified	Not Applicable	19-Mar-12	19-20 July 2021
		Smallholders -West Division (309)		from - 2.809440 to -2.992770	From 151.028330 to 151.345280	533.54	Certified	Not Applicable	19-Mar-12	19-20 July 2021
Ramu Agricultural Industries Ltd (RAIL)	PNG	Gusap Mill	Morobe Province, Papua New Guinea	-6.088989	145.006104	14606.08	Certified	Not Applicable	5-Aug-10	19-20 July 2021

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Ramu Agricultural Industries Ltd (RAIL)	PNG	Gusap East (Gusap) Estate	Morobe Province, Papua New Guinea	-6.088556	146.00600	2856.45	Certified	Not Applicable	5-Aug-10	19-20 July 2021
		Gusap West (Paddox) Estate		-6.049400	145.99390	3019.09	Certified	Not Applicable	5-Aug-10	19-20 July 2021
		Surinam Estate		-5.900300	145.783600	2154.14	Certified	Not Applicable	5-Aug-10	19-20 July 2021
		Dumpu Estate		-5.855700	145.730400	2254.36	Certified	Not Applicable	5-Aug-10	19-20 July 2021
		Ngaru Estate		-6.139300	146.623100	854.33	Certified	Not Applicable	5-Aug-10	19-20 July 2021
		J Estate (Jephcott) Estate		-6.056200	145.933000	2824.01	Certified	Not Applicable	5-Aug-10	19-20 July 2021
		Smallholders - Madang VOPs (71)		-5.462500	145.344600	360.00	Certified	Not Applicable	5-Aug-10	19-20 July 2021
		Smallholders - Morobe VOPs (253)		-6.762000	146.130400	283.70	Certified	Not Applicable	5-Aug-10	19-20 July 2021
Higaturu Oil Palm (HOP)	PNG	Sangara Oil Mill	Oro Bay Province, Papua New Guinea	-8.743400	148.198700		Certified	Not Applicable	1-Feb-13	19-20 July 2021
Higaturu Oil Palm (HOP)	PNG	Mamba Oil Mill	Oro Bay Province, Papua New Guinea	-8.854700	147.707000		Certified	Not Applicable	1-Feb-13	19-20 July 2021
Higaturu Oil Palm (HOP)	PNG	Embi Estate	Oro Bay Province, Papua New Guinea	-8.850600	148.429200	1737.78	Certified	Not Applicable	1-Feb-13	19-20 July 2021
		Ambogo Estate		-8.712500	148.233600	2040.00	Certified	Not Applicable	1-Feb-13	19-20 July 2021
		Sangara Estate		-8.742800	148.181700	1780.00	Certified	Not Applicable	1-Feb-13	19-20 July 2021
		Sumbiripa Estate		-8.751700	148.963100	2545.00	Certified	Not Applicable	1-Feb-13	19-20 July 2021
		Mamba Estate		-8.848100	147.715000	4013.10	Certified	Not Applicable	1-Feb-13	19-20 July 2021
		Sambogo Estate		-8.799700	148.340000	2637.85	Certified	Not Applicable	1-Feb-13	19-20 July 2021
		Scheme Smallholder Sorovi Division (2019)		-8.758600	148.312800	3940.21	Certified	Not Applicable	1-Feb-13	19-20 July 2021

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		Scheme Smallholder Saiho Division (842)		-8.847500	148.050800	1493.06	Certified	Not Applicable	1-Feb-13	19-20 July 2021
		Scheme Smallholder Aeka Division (911)		-8.673900	148.017800	1474.23	Certified	Not Applicable	1-Feb-13	19-20 July 2021
		Scheme Smallholder Igora Division (1367)		-8.717500	148.135000	2940.15	Certified	Not Applicable	1-Feb-13	19-20 July 2021
		Scheme Smallholder Ilimo Division (671)		-8.893600	147.857800	1063.66	Certified	Not Applicable	1-Feb-13	19-20 July 2021
West New Britain (WNB)	PNG	Mosa Oil Mill	Kimbe, West New Britain, Papua New Guinea	5.622481	150.245278		Certified	Not Applicable	10-Sep-08	19-20 July 2021
		Kumbango Oil Mill		5.591944	150.211944		Certified	Not Applicable	10-Sep-08	19-20 July 2021
		Kapiura Mill		5.623611	150.684167		Certified	Not Applicable	10-Sep-08	19-20 July 2021
		Numundo Mill		5.233333	150.033611		Certified	Not Applicable	10-Sep-08	19-20 July 2021
		Waraston Mill		5.483889	150.086667		Certified	Not Applicable	10-Sep-08	19-20 July 2021
West New Britain (WNB)	PNG	Bebere Estate	Kimbe, West New Britain, Papua New Guinea	5.614081	150.251000	2226.71	Certified	Not Applicable	10-Sep-08	19-20 July 2021
		Kumbango Estate		5.605300	150.196950	2610.80	Certified	Not Applicable	10-Sep-08	19-20 July 2021
		Togulo Estate		5.667369	150.186389	1509.20	Certified	Not Applicable	10-Sep-08	19-20 July 2021
		Dami Estate		5.514181	150.452058	1507.00	Certified	Not Applicable	10-Sep-08	19-20 July 2021
		Waisisi Estate		5.512966	150.454435	1090.00	Certified	Not Applicable	10-Sep-08	19-20 July 2021
		Kautu Estate		5.521269	150.055125	4280.60	Certified	Not Applicable	10-Sep-08	19-20 July 2021
		Karaisu Estate		5.520800	150.752600	2387.64	Certified	Not Applicable	10-Sep-08	19-20 July 2021
		Moroa Estate		5.520962	150.752590	848.16	Certified	Not Applicable	10-Sep-08	19-20 July 2021
		Bilomi Estate		5.617497	150.677997	2011.70	Certified	Not Applicable	10-Sep-08	19-20 July 2021
		Loata Estate		5.653739	150.666787	562.00	Certified	Not Applicable	10-Sep-08	19-20 July 2021

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	Haella Estate	5.521269	150.048760	4220.30	Certified	Not Applicable	10-Sep-08	19-20 July 2021
	Garu Estate	5.512894	149.992978	3709.60	Certified	Not Applicable	10-Sep-08	19-20 July 2021
	Daliavu Estate	5.569761	150.022617	2484.10	Certified	Not Applicable	10-Sep-08	19-20 July 2021
	Sapuri Estate	5.569761	149.992978	2180.90	Certified	Not Applicable	10-Sep-08	19-20 July 2021
	Malilimi Estate	5.657400	150.441497	3837.00	Certified	Not Applicable	10-Sep-08	19-20 July 2021
	Rigula Estate	5.619300	150.792100	3720.00	Certified	Not Applicable	10-Sep-08	19-20 July 2021
	Nomundo Estate	5.499700	150.086600	2645.17	Certified	Not Applicable	10-Sep-08	19-20 July 2021
	Navarai / Karato ME /KDC EU Estate	5.359989	150.035939	1103.77	Certified	Not Applicable	10-Sep-08	19-20 July 2021
	Volupai / Lotomgam / Natupi / Goruru Estate	5.264997	150.009500	1992.59	Certified	Not Applicable	10-Sep-08	19-20 July 2021
	Lolokoru Estate	5.114500	150.058797	2453.10	Certified	Not Applicable	10-Sep-08	19-20 July 2021
	Ove Estate	5.580100	149.694400	3541.00	Certified	Not Applicable	10-Sep-08	19-20 July 2021
	Tamare Estate	5.625800	149.735300	1362.70	Certified	Not Applicable	10-Sep-08	19-20 July 2021
	Smallholders LSS Mosa (1822)	5.594119	150.226439	5008.53	Certified	Not Applicable	10-Sep-08	19-20 July 2021
	Smallholders VOP East (1817)	5.469011	150.452478	5324.37	Certified	Not Applicable	10-Sep-08	19-20 July 2021
	Smallholders VOP Central (1964)	5.593700	150.310900	5756.57	Certified	Not Applicable	10-Sep-08	19-20 July 2021
	Smallholders VOP West (1279)	5.280369	150.006219	2804.10	Certified	Not Applicable	10-Sep-08	19-20 July 2021
	Smallholders LSS Kapiura (551)	5.556645	150.850221	551.00	Certified	Not Applicable	10-Sep-08	19-20 July 2021

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		Smallholders VOP Kapiura (850)		5.548892	150.868508	847.00	Certified	Not Applicable	10-Sep-08	19-20 July 2021
		Smallholders Kaulong/Akami/Pushiki /Repamira/Sakapei (20)		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.	PNG	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.	PNG	Munum Estate	Markham Farms	-6.542150	146.816230	1734.57	Certified	Not Applicable	27-Mar-20	19-20 July 2021
		Maralumi Estate		-6.542150	146.674450	2427.15	Certified	Not Applicable	27-Mar-20	19-20 July 2021
		Erap Estate		-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 two (2) Critical; one (1) Minor nonconformities and zero (0) Opportunity For Improvement raised. The Strategic Operating Unit (SOU) 10 - Bukit Puteri Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2331174-202304-M1	Issued Date	06/04/2023
Due Date	05/07/2023	Closure Date	31/05/2023
Indicator & Category (Critical / Minor)	3.8.12 (Major)		
Statement of Nonconformity:	The mill has delivered mass Balance sales from a negative stock.		
Requirement Reference:	Record Keeping i) 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. b) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e., product can be sold before it is in stock.		
Objective Evidence:	Noncompliance on the implementation of Supply Chain Records and Transactions were verified as below. Based on the verification of the Mill’s PK Production and PK Sales registered in RSPO PalmTrace for the period under review (Apr 2022 to Mar 2023), it was found that the mill has sold PK from a negative stock for 6 consecutive months, Aug 2022 – Dec 2022. As of to date (Mar 2023), the mass balance record still recorded negative balance. (- 176.01 mt)		
Corrections:	Mill management to liaise with GSD and Global Trading team to ensure accurate mass balance accounting and consistency of the remaining balance at the mill and Global Trading for selling purpose.		
Root Cause Analysis:	Inaccurate mass balance accounting for the mill and lack of monitoring mechanism together to avoid overselling of CSPK together with Global Trading team.		
Corrective Actions:	1. GSD team will provide an in-house training on 2 & 3 May 2023 regarding RSPO Supply Chain Certification and mill will send executive-in-charge of SCCS to attend the training with training evaluation. 2. Mill Management & Global Trading team to establish frequent communication on the mass balance accounting/ balance of certified volume on monthly basis.		

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Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> In house training with training evaluation has been conducted on 2-3/05/2023. Refer RSPO MSPO Supply Chain Certification In House Training by Group Sustainability. Training given by Pn Aminah Ang. Sighted evidence of mill representative, Mr Muhammad Izzat Farhan. Frequent communication between mill management and Global Training team has been conducted via email on monthly basis. Refer correspondence email between mill and Global Trading dated 23/05/2023 and 10/02/2023. Month record template on CPO and PK produced has been established and sent to Global Trading before 7th every month. Verification on PK record found last despatch was on Dec 2022 and until date of the audit, there is no PK Despatch due to mill have to positive back their stock. Refer latest Mass Balance record dated May 2023. Interview with Mill management confirmed that correction and corrective action has been implemented. <p>Based on the above evidence, the major Non-Conformity is closed effectively on 31/05/2023. Continuous implementation will be further verified in the next assessment.</p>
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Non-conformity			
NCR Ref #	2331174-202304-M2	Issued Date	06/04/2023
Due Date	05/07/2023	Closure Date	31/05/2023
Indicator & Category (Critical / Minor)	6.7.3 (Critical)		
Statement of Nonconformity:	Appropriate PPE and Sanitation Facility was not used.		
Requirement Reference:	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash, and put on their personal clothing.		
Objective Evidence:	<ol style="list-style-type: none"> During the site visit to the spraying operation at Bukit Puteri Estate, it was verified that the sprayers did not wear appropriate PPE (Safety Goggles) while in operation. This was not in accordance with the HIRARC – Spraying dated 15/01/2022 of Bukit Puteri Estate. Interview with the sprayers indicated that they do not sanitise themselves prior to returning home from spraying activities. They acknowledged that they only use the facility to wash the PPEs and return home to sanitise themselves. 		
Corrections:	<ol style="list-style-type: none"> The Estate immediately supplies anti fogged goggle to all sprayers and ensure they are being worn during spraying. Briefing is to be done to mandore to make sure that all sprayers wear full PPEs during spraying. To conduct awareness briefing to sprayers in order to explain the importance to sanitize themselves before going back home and appoint mandore to record whether workers have sanitized themselves after spraying before returning home and report immediately to estate management if otherwise. 		

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Root Cause Analysis:	<ol style="list-style-type: none"> 1. Lack of monitoring by mandore/ estate management of appropriate PPE usage by sprayers during the spraying operation. PPE checklist is available, however is ineffective as mandore/staff/assistant did not fully utilize it. Further checking with sprayers that the google provided by Estate management will fog when worn during operation. 2. Lack of monitoring by Estate management to ensure that the facility is used and no mechanism to ensure that the SOP is adhered to. Estate management has spoken to sprayers and the sprayers claimed that they are more comfortable showering at home rather than at the facility provided, and no monitoring is implemented.
Corrective Actions:	<ol style="list-style-type: none"> 1. Staff to do spot check on the compliance on PPE usage and mandore to ensure that PPE checklist is fulfilled on daily basis (Spraying Operation) during muster call. 2. To conduct refresher training on the importance of PPE usage during chemical handling with training evaluation. 3. To appoint staff-in-charge to monitor the overall records of showering facility usage periodically.
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1. Checking on PPE by staff has been conducted. Refer latest record BPE PPE Checklist dated 29/05/2023, 25/05/2023, 24/05/2023, 23/05/2023 and 20/05/2023 as per spraying operation. Refer Muster chit on checking the spraying activity. 2. Refresher training with training evaluation has been conducted. Refer Refresher Training To Sprayers dated 05/04/2023 and 09/05/2023 and Briefing Regarding The Importance Of Emergency Washroom And Training On How To Use dated 05/04/2023 and 09/05/2023. Training evaluation has been done. Refer Training Need Analysis dated 09/05/2023. 3. Appointment letter to staff in charge sighted to Mr Zaini Bin Ramli dated 02/05/2023 with reference "Surat Perlantikan Staff Bertanggungjawab Pematuhan Mandi Selepas Kerja Racun". Interview with person in charge found have good understanding on their task responsibilities. 4. Inspection on Sprayers PPE at Bukit Puteri estate found all PPE was wearing accordingly. PPE used was Safety goggles, Respirator, Apron, Wellington boots, and nitrile gloves. Interview with sprayers found they have good awareness on using shower facility before back to their house. Checking on shower facility found all equipped and function accordingly. 5. Site visit at estate found all correction and corrective action has been implemented. 6. Interview to sample workers and person in charge found the awareness on it was in order. <p>Based on the above evidence, the major Non-Conformity is closed effectively on 31/05/2023. Continuous implementation will be further verified in the next assessment.</p>

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Non-conformity			
NCR Ref #	2331174-202304-N1	Issued Date	06/04/2023
Due Date	Next Assessment (ASA2_3)	Closure Date	TBC
Indicator & Category (Critical / Minor)	3.3.2 (Minor)		
Statement of Nonconformity:	Mechanism to check consistent implementation of procedures were not effectively demonstrated.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<p>Bukit Puteri Estate</p> <p>Site visit carried out at house# E25 (division B), damage complaint recorded in OPP against actual condition for main and room doorknob broken and bathroom water tub/container leaking were verified. Risk category rated as "low" however based on Appendix C; Recommended timeline for repair completion it should be rated as high for the main door broken and water tank leakage issue.</p> <p>For house# A8, in the OPP tracker/summary, damage complaint made on 24/1/23 for broken ceiling, electrical plug point and no water supply for kitchen sink. Repair work completed on 18/2/23 and updated in OPP tracker/summary. Based on interview with house# A8 owner has confirmed that repair work has yet to be completed. Status reported in OPP tracker/summary was found to be inconsistent with the actual status as to date.</p> <p>Bukit Puteri POM</p> <p>During site at house# J101, it was found that outlet pipe blocked due to modification of new V-drain and causing stagnant water at the parameter drain. Based on latest (housing complex/nest/community hall weekly inspections (PIOA) dated 25/3/23, this was not reflected in the inspection sheet.</p> <p>Reference:</p> <ul style="list-style-type: none"> i) Workers Housing Management Procedure version 1, dated 30/6/2022, Appendix C; Recommended timeline for repair completion ii) 'OilPalmPal' Digital Housing Complaint System (OPP DHCS). 		
Corrections:	<p>Bukit Puteri Estate</p> <p>Estate Management to update remark in the OPP for house# E25 (division B) repair on the categorization of risk category. The handyman was instructed to repair immediately and repairs were completed on 5th April 2023 and additionally to update the OPP system on the work completion.</p> <p>Bukit Puteri POM</p> <p>Mill management has found of the cause of the stagnant water and will repair the drain for all houses and connect back to the new V-drain. Mill management has already tendered out to repair the drain on 20 March 2023 and closing date for tendering is on 11 April 2023. Mill will proceed for tender evaluation and get top management approval before appoint vendor to do the repair work. Mill estimate by end July 2023 the repair work will finish.</p>		
Root Cause Analysis:	Bukit Puteri Estate		

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	<p>During inspection the water leakage in bathroom container where the storage of water still available in overhead water tank and the door can be lock using door lock from inside. For the above reason the inspection was rated as low based on inspector justification on site. Estate overlooked to put comments in remark column in the OPP system to record the real conditions to explain why the case is rated as low. Miscommunication where handyman reported that the repair was completed to Estate Management. There is multiple complaint in one report. Part of the work were completed where some of the complaint is still pending for repair. Closure of report is made with communication with handyman alone rather than confirming with the occupants on work completion.</p> <p>Bukit Puteri POM</p> <p>Ineffective housing inspection by Assistant Manager (Person-in-charge of Accommodation) resulting in the issue is unable to be detected beforehand. Estate Management modified the V-drain in early 2023 to construct new drainage at their housing, effecting Mill workers’ drainage system. Ineffective complaint mechanism as workers did not report the issue in either Social Dialogue or OPP. All issues that have been raised as non-conformities has been identified due to lack of competencies of the PIC and ineffectiveness of the training.</p>
<p>Corrective Actions:</p>	<p>Bukit Puteri Estate</p> <ol style="list-style-type: none"> 1. Estate management representative has to follow the procedures and to report more precisely on the risk category and work completion in the remark column in the OPP system. 2. To brief workers to report separately for each breakdown in on OPP system and to brief house owners to follow up with divisional executive if the repair pending more than a week. 3. The house owner to sign and verify work done once work completed. <p>Bukit Puteri POM</p> <ol style="list-style-type: none"> 1. Mill management to communicate with workers’ representative (WR) during Social Dialogue to strengthen reporting of housing related issues to the management. 2. Mill management to improve housing inspection quality by attaching picture periodically as evidence of housing compound condition. 3. To fully utilized the training evaluation form which will be fill up by the participant and approved by the trainer.
<p>Assessment Conclusion:</p>	<p>The CAP submitted found adequate to address the non-conformity. The effectiveness of CAP implementation will be assessed during next assessment.</p>

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

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

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2186018-202204-M1	Issued Date	8/4/2022
Due Date	5/7/2022	Closure Date	5/7/2022
Indicator & Category (Critical / Minor)	2.1.1 (Major)		
Statement of Nonconformity:	Bukit Puteri Palm Oil Mill has not established evidence of compliance to Regulation 5 of Environmental Quality (Clean Air) Regulations 2014 as sighted one unit Fume Hood at Laboratory and another unit in ETP Mini Laboratory not having Written Notification to Department of Environment.		
Requirement Reference:	The Unit of Certification complies with legal requirements		
Objective Evidence:	<ul style="list-style-type: none"> No Written Notification to DOE under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014 for one unit of Fume Hood located in Laboratory of Bukit Puteri Palm Oil Mill. Sampled in ETP Mini Laboratory of Bukit Puteri Palm Oil Mill another unit of Fume Hood also not having Written Notification to DOE under Regulation 5 of Environmental Quality (Clean Air) Regulations 2014. 		
Corrections:	<ul style="list-style-type: none"> Appointment of consultant to complete the DOE submission Appointment of Site Safety & Sustainability Officer with job description revision November 2021 		
Root Cause Analysis:	The recommendation from NRA report and water quality analysis report were missed out due to change of person in-charge of monitoring including legal compliance.		
Corrective Actions:	Appointment of consultant to complete the DOE submission Appointment of Site Safety & Sustainability Officer with job description revision November 2021		
Assessment Conclusion:	Corrective action plan (CAP) has been accepted after 2nd submission on 1/6/2022. Verification of documented CAP evidence submitted for remote verification on 5/7/2022 for both correction and corrective action were conducted off-site found the following: <ul style="list-style-type: none"> Purchase Order (PO) for appointment of consultant to complete the DOE submission dated 2/6/2022 Letter by consultant for application to DOE dated 30/6/2022 Appointment of Site Safety & Sustainability Officer with job description to monitor compliance. 		

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	Evidence of correction and corrective actions taken were verified and confirmed to be effective to address noncompliance. Hence, Major NC was closed on 5/7/2022.
Effectiveness Closure (for previous audit closed Critical NC):	Sime Darby SOU 10 Bukit Puteri POM Certification Units has ensured legal compliance is in place. Refer Legal Other Requirement Register (LORR) Summary of Compliance updated January 2023. Refer Appointment letter to person in charge dated January 2023 to Assistant Manager Mill and Estate, that stated on monitor LORR and legal requirements. The system purposely to track changes to the laws and regulations. Bukit Puteri POM have appointed DOE’s environmental auditor to conduct 3 rd party audit of the mill in accordance with the Compliance Schedule (License Number: 004160). The 3 rd party audit has been done biannually and the reports were available for verification. Thus, Major NC remain closed.

Non-conformity			
NCR Ref #	2186018-202204-N1	Issued Date	08/04/2022
Due Date	04/04/2023	Closure Date	06/04/2023
Indicator & Category (Critical / Minor)	3.3.3 (Minor)		
Statement of Nonconformity:	Records of monitoring and actions taken to address issues were insufficiently available.		
Requirement Reference:	Records of monitoring and any actions taken are maintained and available.		
Objective Evidence:	<ol style="list-style-type: none"> 1. Records action taken to address Noise Risk Assessment issue recommendation insufficiently available. Noise Risk Assessment was received on 18/02/2022. The report states that the employer has to take action to control exposure within 30 days upon receiving the assessment report. As of to date the action plan and status of compliance has not been derived by the management. - Verified that there was no action plan for the Audiometric Test to be conducted as of yet. 2. Records action taken to address Water Quality issue insufficiently available: Water Quality for Domestic use is monitored on a monthly basis at the mill. The Water Analysis Test Report (Test Report Number: IE251/2022), Sampled on 17/02/2022 and Report issued on 01/03/2022. As per the SOP, Sime Darby Plantation; Plantation Quality Management System; Sustainable Plantation Management System; SOP for Water Quality Monitoring; Date: 01/06/2016; 5.5 Evaluation of Laboratory Test Results, the mill is required to raise a Corrective/Preventive Action Report for Non-Conforming Water Analysis Results and the resampling has to be done within 7 days. The Mill has not raised a Corrective/Preventive Action Report for Non-Conforming Water Analysis Results and the resampling has not been done as of to date. 		
Corrections:	<p>Estate has requested quotation for Audiometric Test from three (3) vendors i.e Specialist Mobile Safety Supplies Sdn. Bhd, Best Hearing Aid Centre and Clinic Sulaiman via email on 15/04/2022. Training for targeted employees who exposed to excessive noise is included in OSH training Matrix for FY 2022.</p> <p>Mill will prepare Corrective/Preventive Action Report for any Non-Conforming of latest Water Analysis Result expected to be received by month-end from R&D. Immediately carry out water resampling and send to the R&D for analysis within 7 days.</p>		

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Root Cause Analysis:	The recommendation from NRA report and water quality analysis report were missed out due to change of person in-charge of monitoring.
Corrective Actions:	The SOU 10 has appointed Site Safety and Sustainability Officer (SSSO) to monitor SOP and legal compliance for both estate and mill.
Assessment Conclusion:	<ol style="list-style-type: none"> 1. SOU 10 has appointed Site Safety Officer and Sustainability Officer (SSSO) to monitor the implementation of SOPs and legal compliance at the certification unit. The appointment letter was available for verification. The sites have also appointed PIC to monitor the compliances at the site level. Sighted the identified and assigned suitable employees to monitor compliance by management En. Mohd Hazizul Bin Mohammad Nor (Assistant Engineer) – Quality Management Systems Representative dated 04/01/2021 at Bukit Puteri POM. 2. The compliance of procedures and legal requirements were sampled and verified. There were no lapses in implementation of procedures or legal compliance identified during this assessment. <ul style="list-style-type: none"> – An audiometric testing was done on 25/07/2022 for 80 mill employees, conducted by Hitec Environmental Science Technologists Plt. – Water Quality Monitoring was conducted in compliance to Sime Darby Plantation; Plantation Quality Management System; Sustainable Plantation Management System; SOP for Water Quality Monitoring. <p>Based on the verification done it was justified that the implementation of the correction and corrective action plans by the management have effectively address the raised minor non-conformity. Hence the minor non-conformity is closed on 06/04/2023</p>
Effectiveness Closure (for previous audit closed Critical NC):	N/A

Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement: 2186018-202204-I1 3.3.2: Bukit Puteri Palm Oil Mill to make further arrangement by appointing registered DOE's Environmental Auditor for conducting second 3rd party audit of current DOE's License no. 004160 before 30/06/2022.</p> <p>Verification / Follow-up actions: Bukit Puteri POM have appointed DOE's environmental auditor to conduct 3rd party audit of the mill in accordance with the Compliance Schedule (License Number: 004160). The 3rd party audit has been done biannually and the reports were available for verification.</p>
OFI 2	<p>OFI Statement: 2186018-202204-I2 7.2.6: The pesticides washroom and Emergency Shower area, to be further upgraded as planned in CAPEX FY 2022 Bukit Puteri Estate to upgrade the facility of Chemical Pre-Mixing Area to improve mitigation of potential chemicals run off to drain and surrounding environment.</p> <p>Verification / Follow-up actions:</p>

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	During the assessment, it was verified that the washroom and emergency shower were adequately established. The washroom had well working showers which were sufficient for chemical applicators to sanitise themselves. Emergency showers were also available and verified to be functional. The chemical premix area was well banded to avoid any potential chemical runoff. The access water was channelled to a sump that can be recollected after for reuse.
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3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2020.01	Major	6.2.2	19/9/2020	2/10/2020
2045335-202104-M1	Major	7.8.2	16/4/2021	Closed on 15/07/2021
2045335-202104-M2	Major	7.10.3	16/4/2021	Closed on 15/07/2021
2045335-202104-M3	Major	3.6.1	16/4/2021	Closed on 15/07/2021
2045335-202104-M4	Major	6.7.3	16/4/2021	Closed on 15/07/2021
2045335-202104-M5	Major	6.2.3	16/4/2021	Closed on 15/07/2021
2045335-202104-N1	Minor	2.1.3	16/4/2021	Closed on 04/04/2022
2045335-202104-N2	Minor	7.12.7	16/4/2021	Closed on 04/04/2022
2045335-202104-N3	Minor	7.11.3	16/4/2021	Closed on 04/04/2022
2045335-202104-N4	Minor	2.2.2	16/4/2021	Closed on 04/04/2022
2186018-202204-M1	Major	2.1.1	8/4/2022	Closed on 05/07/2022
2186018-202204-N1	Minor	3.3.3	8/4/2022	Closed on 06/04/2023
2331174-202304-M1	Major	3.8.12	6/4/2023	Closed on 31/05/2023
2331174-202304-M2	Major	6.7.3	6/4/2023	Closed on 31/05/2023
2331174-202304-N1	Minor	3.3.2	6/4/2023	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 Strategic Operating Unit (SOU) 10 - Bukit Puteri Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

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

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.

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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)
Contractor	XXX Oil Palm Plantations Sdn Bhd ZZZ Palms Sdn Bhd	Face to face
Union	NUPW Representatives (Bukit Puteri POM and Estate)	Face to face
Contractors	ABC Enterprise	Phone interview
Internal	Gender committee, local and foreign workers representative	Face to face
External/NGO	Pahang State NUPW, Termerloh	Phone interview

Stakeholders comment	
1	<p>Feedbacks: NUPW Representatives (Bukit Puteri POM and Estate) Interview with the representative attended, informed they were elected by the workers through online election in WhatsApp application. They informed always give good cooperation and participate any meeting conduct by management to discuss any issues related to workers. All issues reported were acted by the management and resolved accordingly. The representative informed she will attend monthly meetings at NUPW Temerloh Office to discuss any update related to collective agreement. The were made aware on the status of latest Collective Agreement (CA) under MAPA/NUPW is still pending and any revision to the latest rates will be based on the latest Minimum Wages Order 2022 @ RM 1500/</p> <p>Audit Team verification and response: Management always given full cooperation to union and support their activities without any interfered. Management always give freedom to workers to join any associations. No further issue.</p>
2	<p>Feedbacks: OCP Suppliers (XXX Oil Palm Plantations Sdn Bhd and ZZZ Palms Sdn Bhd) During interview sessions with contractors informed they signed contract agreement with Sime Darby Plantation Berhad prior to provide services. The terms and conditions being briefed by estate management prior to signed the contract included the payment term. During the briefing, the contractors agreed VCOBC and Integrity Pledges are signed prior the agreement signed. Payment made promptly after invoicing issued by the contractors and meet payment terms timeline. They informed, estate and mill management monitor their performance by monthly which includes due diligence consist of employment contract, pays lip and other related applicable requirement.</p> <p>Audit Team verification and response: Reviewed due diligence document is available together with VCOBC and Vendor Integrity Pledges form signed by both parties. No issues of late payment based on the records verified.</p>
3	<p>Feedbacks: Foreign workers representative They did not pay any recruitment fee for getting a job in Sime Darby Plantation. They have been briefed on the terms and conditions and working environment in the plantations while they were in home country. Their wages are paid according to Minimum Wage Order 2022 and Collective Agreement. During high peak of 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 Employee Workers Committee (EWC) to discuss workers matter including benefits and wages by voting among themselves without management interfere.</p>

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	<p>Audit Team verification and response: No issues on management continuously communicate with foreigner workers for better understanding on task offered.</p>
4	<p>Feedbacks: Local workers</p> <p>They apply work with estate and mill based on the vacancy information spread through WhatsApp/word of mouth. They have been briefed on the terms and conditions and working environment in the plantation during the interview before been offer with the job they acquired. Their wages are paid according to Minimum Wage Order 2022 and Collective Agreement. They interested to join as member of union, and they not been stop by management. During high peak of 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 estate and mill will all amenities, benefit and good salary offered. Unfortunately, number of local workers for estate vacancy applied below with manpower budget which still not enough to cover the operations job task. Therefore, management offered the job vacancy to foreigner. Management advertises the job vacancy in through WhatsApp/word of mouth to attract local worker continuously.</p>
5	<p>Feedbacks: Pahang State NUPW, Temerloh</p> <p>Current updates on the Collective Agreement (CA) based on the latest Minimum Wages Order 2022 is still pending under court decision. Pahang State NUPW continuously update and brief site NUPW representatives to explain the reason for the delay and arrears for those impacted under package as written under Article 6 – rates of pay for harvesting which involve price bonus, special gratuitous payment, and productivity incentive.</p> <p>Audit Team verification and response: Site NUPW representative made aware on the latest CA updates and will continue to explain to the rest of union members from time to time.</p>
6	<p>Feedbacks: Gender committee</p> <p>They informed that the management treated the female workers equally with male workers includes job opportunity and promotion of work based on work performance and capability. They also informed that no case of discrimination, sexual harassment and domestic violence reported. They are aware on the reporting channel if any case of sexual harassment and domestic violence occur in the estate and mill.</p> <p>Audit Team verification and response: Reviewed records of meeting minutes for Gender Committee verified the discussion been recorded. Onsite interview confirmed no discrimination and sexual harassment lodged by female workers and minutes.</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
Not applicable as the estate already underwent two cycles of replanting	N/A	N/A	N/A	N/A	N/A

Previous land owner / user comment

	Feedbacks: N/A
	Audit Team verification and response: N/A

3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Bukit Puteri Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Bukit Puteri Oil Mill is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: NOR HALIS ABU ZAR	Name: Shylaja Devi Vasudevan Nair
Company Name: BSI SERVICES MALAYSIA SDN BHD	Company Name: Sime Darby Plantation Bhd
Title: CLIENT MANAGER	Title: Head, Sustainability Compliance Unit, Group Sustainability Dept.
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 31/05/2023	Date: 10/07/2023

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>Based on the Estate Quality Management System; Sub-Section 5.5 Management Responsibility; Appendix 5.5.3.2 Procedure for External Communication; Version 1; Issue date: 1/1/2008, documents specified for mill and all estates within SOU 10 Certification Unit made available as per sample as following:</p> <ul style="list-style-type: none"> - Land titles/user rights - Occupational health and safety plans - Plans and impact assessments relating to environmental and social impacts - HCV documentation - Pollution prevention and reduction plans - Details of complaints and grievances - Continuous improvement plans - Public summary of certification assessment report - Group Sustainability Policy - Record of contributions to community development <p>All operating units have individual documents and records to demonstrate compliance to this indicator.</p> <p>Other publicly available documents such as policies, company statement and annual reports were made available in the website;</p>	Complied

		<p>http://www.simedarbyplantation.com/.</p> <p>For CSR related activities, information relating to social program on education, environment, community and health, etc, Yayasan Sime Darby as the Foundation has expanded its wings from offering scholarships to outstanding and deserving individuals to funding impactful conservation, outreach and development programmes. The Sime Darby Plantation Berhad website address http://www.yayasansimedarby.com/.</p> <p>Figures of gender distribution within all workers categorized by management, administrative staff and workers (both permanent casual workers, piece rate workers) were made available at estate and mill office with record titled 'SEMUA – EMPLOYEE MASTER LISTING'.</p>	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Information available in appropriate languages and accessible to relevant stakeholders through sample meeting latest conducted at each specific operating unit. For SOU10, stakeholder meeting was carried out on 31/3/2023. Stakeholder bulletin (complaint and grievance procedure, fire prevention and RSPO requirements) and social dialogue reinforcement were discussed in the meeting with internal stakeholders. Information (in bi-lingual English and Malay) can be seen in the strategic area within estate and mill compound</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Should there be any request for information that are specified in the RSPO P&C from any stakeholders, record of request can be maintained in few ways such as Communication Logbook, and filing of correspondence documents e.g., email printout, and letter. The operating units maintain records of all request and response. Engagement process via email/letter to stakeholders were also done together with feedback form if there is any issue to be reported or highlighted to the management. Based on record, there was no request for information by any stakeholders as to date.</p>	Complied

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1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.</p>	Complied
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>Both the estate and the mill continued to maintain the stakeholder’s information (address, contact number, nominated representatives) which included the contractors, vendors/suppliers, foreign recruitment agencies, embassy, government agencies, schools, local communities, CPO/PK customers, etc. The list of stakeholders has been established by the mill. The list was updated on for 2022 comprises of various parties, neighbouring communities, and Government Agencies.</p> <p>The subjects discussed during the meeting held on 5/6/2022 with the presence including stakeholders among others discussed on the following subjects:</p> <ul style="list-style-type: none"> a) Company Policies and SOP b) Issues relating to neighborhood and concerns c) Appointment of social liaison officer for each OU d) Explanation of 11 ILO indicators <p>There is no major course of concern of issues highlighted during the meeting</p>	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
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 Plantation Berhad has implemented Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business</p>	Complied

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		<p>processes. The policy was developed in Bahasa Malaysia and English. Training and updates related COBC have been given by representative from HQ level to executive (Managers and Assistant Managers) during monthly meeting with top management and updates via email as per verification during the audit.</p> <p>The latest Group Sustainability & Quality Policy Statement also includes the clause 'promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC) signed by Group Managing Director on 02/12/2019. Sime Darby has imposed the implementation of the COBC to all its contractors and vendors by signing the Vendors Integrity Pledge document. Copies of the signed pledges were kept by all the operating units and made available for verification. Besides, policies were briefed to stakeholders during the stakeholder meeting. COBC awareness briefing was done on 24/02/2023 at Bukit Puteri Estate.</p>	
<p>1.2.2</p>	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -</p>	<p>Sime Darby Plantation Berhad has established the Vendor Integrity Pledge (VIP) and Vender COBC as a due diligence for external parties engaged by Operating Units. Sighted sampled as below:</p> <ul style="list-style-type: none"> i. XXXX A Sdn Bhd (823875-U) ii. XXXX B Trading (IP0316449-W) iii. XXXX C (001254845-W) <p>At the operating unit level, the system to monitor is mainly by regular checking of the contractors' legal compliance and employees' welfare by the management. Apart from that, annual internal audit is also one of the methods to ensure whether the management is monitoring the compliance and implementation of the policy of the counterparties.</p>	<p>Complied</p>
<p>Principle 2: Operate legally and respect rights</p>			

Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.		
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	<p>Sime Darby Plantation Berhad SOU 10 Bukit Puteri POM Certification Unit continues to comply with all verified legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and HQ. The sampled mill and estates had obtained and renewed license and permits as required by the law. Among others the licenses/permit verified were:</p> <p><u>Bukit Puteri Estate:</u></p> <ol style="list-style-type: none"> 1. MPOB License #524186002000 valid from 01/11/2022 to 31/10/2023 2. Air Receiver #PMT110331 valid until 11/12/2023 3. Air Receiver Tank #PH PMT 81559 valid until 24/04/2023 4. Diesel Permit #KPDNHEP.PHG.RAUB.600-5/4/063 valid from 26/05/2022 to 25/05/2022. <p><u>Bukit Puteri POM:</u></p> <ol style="list-style-type: none"> 1. MPOB Licence #536632004000 valid from 01/03/2023 to 29/02/2024 2. Jadual Pematuhan DOE Licence #004160 with reference file JAS.CHQ 600-3/1/2/32(44) valid from 01/07/2022 to 30/06/2023. 3. Deaerator Header S.S #PH PMT 82648 valid until 11/12/2023 4. Back Pressure Vessel #PH PMT 785 valid until 11/02/2023 5. Electricity permits #2022/03034 Serial No: 57160 valid from 20/09/202 to 19/09/2023 6. Competence person CePSWaM #CePSWaM/2215234 to Assistant Engineer NRIC 8907XX-XX-XXXX valid until 18/04/2023. 7. Competence person CePPOME #CePPOME/00260 to Assistant Engineer NRIC 880809-XX-XXXX.

Complied

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		8. Written Notification On Installation Of Exhaust / Vent Under Regulations 5 Of The Environmental Quality (Clean Air) Regulation 2014 dated 07/09/2022	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations. - Minor compliance -	Sime Darby Plantation Berhad SOU 10 Bukit Puteri POM Certification Units has ensured legal compliance is in place. Refer Legal Other Requirement Register (LORR) Summary of Compliance updated January 2023. Refer Appointment letter to person in charge dated January 2023 to Assistant Manager Mill and Estate, that stated on monitor LORR and legal requirements. The system purposely to track changes to the laws and regulations. Among the latest updated laws were: <ul style="list-style-type: none"> • Minimum wages order 2022 • Employees’ Social Security (Amendment) Act 2022 • Employment Insurance System (EIS) (Amendment) Act 2022 • Employment (Amendment) Act 2022 	Complied
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 -	Legal or authorised boundaries are clearly demarcated and visibly maintained as per verification during site visit. Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of sample estate to indicate the legal boundaries are through construction of trenches and parameter road. This was confirmed through the field visit at Bukit Puteri Estate found practiced was clearly visible. Boundary and monthly patrolling record was verified. Bukit Puteri Estate Sighted boundary at P98A neighbouring Felda Sungai Koyan and P09A neighbouring with Smallholders. Verified that there is no planting beyond these legal or authorised boundaries.	Complied
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			

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2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>A list of contracted parties maintained by all operating units within SOU 10 in their respective List of Stakeholders Information FY 2023 which consists of stakeholders among Local Community Heads, Neighbours, Local Authorities, Vendors (Contractors & Suppliers).</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>Contracts contain specific clauses on meeting applicable legal requirements available in the Vendor Integrity Pledge records for sampled contractors as per below:</p> <p><u>Bukit Puteri POM</u></p> <p>a. Contractor: XXXX AA (M) Sdn Bhd; Agreement on the Transportation of Crude Palm Oil (CPO) for Sime Darby Plantation Berhad’s Peninsular Malaysia Oil Mills. Contract valid for 3 years from 01/11/2020 – 31/10/2023</p> <p><u>Bukit Puteri Estate</u></p> <p>a. Contractor: XXXX BB Enterprise, FFB Transportation Service for Sime Darby Plantation Berhad’s estates; Dated: 22/02/2022, valid for 2 years from 01/01/2022 to 31/12/2023.</p> <p>b. Contractor: XXXX CC Enterprise, Land Preparation Works for Oil Palm to Oil Palm Replanting; Vendor Integrity Pledge (VIP) available for verification dated 30/06/2022.</p> <p>c. Contractor: XXXX DD, Earthworks; RSPO Declaration - Dated 03/01/2022.</p> <p>Evidence of due diligence of all contracted third parties recorded under checklist of contractor and vendor for 2023. The certification unit conducted regular compliance inspection on the contractors. Based on the evaluation report dated 27/03/2023 done on the contractors of Bukit Puteri Estate, it was stated that there were 100% compliance on the contractors’ due diligence. *There were no active contractors at the mill at the time of the assessment.</p>	Complied

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2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>The contract documents and Vendor Integrity Pledge (VIP) records sighted in the indicator 2.2.2 above also contain clauses disallowing child, forced and trafficked labour. No young workers are employed by contractors and vendors.</p>	Complied
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>Bukit Puteri Estate receives certified FFB from its own supply base estate, Bukit Puteri Estate and non-certified FFB from Outsider Crop Producers (OCP), which includes estates and collection centres. The mill has obtained the required information as per indicator for all FFB suppliers. All records were available and verified during the assessment. Samples as below.</p> <ol style="list-style-type: none"> 1. FFB Collection Centres: CX TXXXX EXXXXXXXX SXX BXX; MPOB License Number: 5388XXXXXXXX; License Expiry Date: 30/04/2023. 2. NXXX AXXXX BXX KXXXXX; MPOB License Number: 6174XXXXXXXX; License Expiry Date: 31/05/2023. 3. PXXXXX PXXXX SXX BXX; MPOB License Number: 5356XXXXXXXX; License Expiry Date: 31/01/2024. 4. AXXXXX OXX PXXX PXXXXXXXXXX SXX BXX; MPOB License Number: 5025XXXXXXXX; License Expiry Date: 31/07/2023. 	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>As per 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, Sime Darby Plantation has submitted the indicator 2.3.2 Case Register to RSPO as per communication email dated 11/11/2022 and acknowledge and registered into the system by RSPO Secretariat as per communication email dated 24/11/2022. Sime Darby Plantation targeted to fulfil the</p>	Complied

		requirement by November 2023 as per Stepwise Plan for Compliance to Indicator 2.3.2 established.	
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>A business plan for 5 years has been documented. SOU 10 certification unit has established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. Annual business plan in the form of annual budget and the projection for 5 years (2023-2027) were prepared as guidance for future planning.</p> <p>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. In the 5 years business plan include items as follows:</p> <ul style="list-style-type: none"> a) Palm oil mill <ul style="list-style-type: none"> i. Mill intake – FFB input ii. Production of CPO iii. Production of PK iv. Total Palm Oil Extraction v. Total Palm Kernel Extraction vi. Mill cost b) Oil Palm Estate <ul style="list-style-type: none"> i. Total crop projection and yield potential ii. Activity direct cost <ul style="list-style-type: none"> a. Mature upkeep b. Manuring c. Harvesting and collection 	Complied

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		<ul style="list-style-type: none"> d. Transportation e. Nursery iii. Estate administration <ul style="list-style-type: none"> a. Admin Cost iv. Labour overhead v. Road and bridges vi. Cost of production. <p>The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2027) and well documented upon request.</p>																						
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>An annual replanting programme for incoming 5 years has been documented. Refer SOU 10 Replanting programme 2023 - 2027. Replanting planned for the palm older than 25 years, non-performance field (yield) and Ganoderma infected palm.</p> <p>Long range replanting program for SOU 10 for the next 5 years as follows:</p> <table border="1"> <thead> <tr> <th colspan="2"></th> <th colspan="5">Replanting (Ha)</th> </tr> <tr> <th colspan="2">Estate</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>Bukit Puteri Estate</td> <td></td> <td>160.59</td> <td>163.24</td> <td>212.67</td> <td>181.70</td> <td>99.93</td> </tr> </tbody> </table>			Replanting (Ha)					Estate		2023	2024	2025	2026	2027	Bukit Puteri Estate		160.59	163.24	212.67	181.70	99.93	Complied
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3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>Procedure of Management Review Meeting was addressed in the Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia, Document No: SD/SDP/GSD/SCCS/0522/01 dated 01/06/2022 Section 20.0 Management Review. Management review was conducted on annually basis by Operating Unit as per SOP</p>	Complied																					

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		<p>established. Latest management review meeting was conducted at each operating unit as follows:</p> <table border="1" data-bbox="1137 434 1921 587"> <thead> <tr> <th>Operating Unit</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Bukit Puteri POM</td> <td>03/04/2022</td> </tr> <tr> <td>Bukit Puteri Estate</td> <td>17/03/2023</td> </tr> </tbody> </table> <p>The minutes of meeting were verified. The topic discussed in the meeting were:</p> <ol style="list-style-type: none"> 1. Introduction 2. Matters Arising 3. Review on status / issue of input and output 4. Sustainability management 5. Changes that could affect the management system 6. Recommendation for improvement 7. Other matters 8. Conclusion 	Operating Unit	Date	Bukit Puteri POM	03/04/2022	Bukit Puteri Estate	17/03/2023	
Operating Unit	Date								
Bukit Puteri POM	03/04/2022								
Bukit Puteri Estate	17/03/2023								
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>									
<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -</p>	<p>Bukit Puteri Estate Social Improvement Plan (CAPEX) i) 10,000-gallon poly tank c/w 50 ft tower at Division B ii) Multi-purpose court in Division A and B</p> <p>The action plan for continuous improvement has been established and implemented for the year 2023 that considered on Social, Environment and Opportunities for the units of certification. Among the plan tabulated in the table below:</p>	<p>Complied</p>						

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Social	
Objective	Action Plan
To review social impacts and to implement plans to mitigate the negative impacts and promote the positive ones	<ol style="list-style-type: none"> 1. Organize stakeholders meeting. 2. Organize Gender committee meeting. 3. Meeting with Union.
To ensure compliance to SOP and legal requirements regarding social	<ol style="list-style-type: none"> 1. Appoint PIC on social. 2. Monitors pay and agreement for workers. 3. Attend workers complaint and grievances. 4. Organize awareness briefing to all employees.
To addressed social issue discussed	<ol style="list-style-type: none"> 1. To control population, od stray dogs and liaise with authority if the population beyond control. 2. Management give advance RM500 to workers before Hari raya.
Addressed issue raised during 2023 stakeholders meeting	<ol style="list-style-type: none"> 1. Liaise with Yayasan Sime Darby on donation to school. 2. Will give information on criminal issue happen surrounding the estate area to Police if any.

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			<p>3. Provide assistance to Fire Department Koyan on requested logistic assistance if any fire occur in the estate due to BOMBA truck cannot enter the field.</p>									
		<p>Waste</p> <table border="1"> <thead> <tr> <th data-bbox="1151 616 1393 663">Waste Generation</th> <th data-bbox="1393 616 1944 663">Action Plan</th> </tr> </thead> <tbody> <tr> <td data-bbox="1151 663 1393 903">Scheduled waste</td> <td data-bbox="1393 663 1944 903"> <ol style="list-style-type: none"> 1. Comply with Schedule waste regulation. 2. Update inventory of SW in E-Swiss on monthly basis. 3. Ensure storage of SW not exceed 180 days. 4. Ensure each SW have labels. </td> </tr> <tr> <td data-bbox="1151 903 1393 1086">Industrial waste</td> <td data-bbox="1393 903 1944 1086"> <ol style="list-style-type: none"> 1. Liaise with Procurement Department for tendering process to appoint vendor to collect scrap metals. 2. Ensure the contractor to dispose the debris after work completion. </td> </tr> <tr> <td data-bbox="1151 1086 1393 1386">Domestic waste</td> <td data-bbox="1393 1086 1944 1386"> <ol style="list-style-type: none"> 1. Identify landfill at least 500m distances from nearest waterways, river. 2. Allocate sufficient amount of dustbin at office and housing compound. 3. Collect waste at estate compound at least 3 times a week. 4. Arrange licenced contractors to de sludge septic tank periodically. </td> </tr> </tbody> </table>			Waste Generation	Action Plan	Scheduled waste	<ol style="list-style-type: none"> 1. Comply with Schedule waste regulation. 2. Update inventory of SW in E-Swiss on monthly basis. 3. Ensure storage of SW not exceed 180 days. 4. Ensure each SW have labels. 	Industrial waste	<ol style="list-style-type: none"> 1. Liaise with Procurement Department for tendering process to appoint vendor to collect scrap metals. 2. Ensure the contractor to dispose the debris after work completion. 	Domestic waste	<ol style="list-style-type: none"> 1. Identify landfill at least 500m distances from nearest waterways, river. 2. Allocate sufficient amount of dustbin at office and housing compound. 3. Collect waste at estate compound at least 3 times a week. 4. Arrange licenced contractors to de sludge septic tank periodically.
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3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p>	<p>RSPO metrics template submitted was verified its data to be consistent and reflective of raw data sources for both Bukit Puteri POM and Bukit Puteri Estate.</p>	Complied												

	- Minor Compliance -		
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Standard Operating Procedures (SOPs) for the estate and mill has been established. Sime Darby SOP issued dated 02/01/2008 and Agricultural Reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units under SOU 10 as a guidance document to conduct estate operation. The estate also holds the Safety Work Procedure. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc.</p> <p>Palm Mill holds two SOPs: Sustainable Plantation Management System (SPMS) version 1 dated 1/11/2008 and Mill Quality Management System version 1 dated 1/11/2008 as a guidance document to operate the mill.</p> <p>For Health, Safety and Environment, both mill and estates, Sime Darby has issued Health, Safety and Environment (HSE) Management System and Standard Operating Procedures. Sime Darby continuously updated the SOP established. Among the updated SOP FY 2022 as follows:</p> <ol style="list-style-type: none"> 1. UM HSE Management System Manual, UM/HSE/MS/01 2. First Aid in Workplace Procedure, UM/HSE/OCP/01 3. Safety Harvesting Procedure, UM/HSE/OCP/02 4. Personal Protective Equipment Procedure, UM/HSE/OCP/03 5. Chemical Safety Management Procedure, UM/HSE/OCP/04 6. Permit to Work (PTW) Procedure, UM/HSE/OCP/05 7. OSH Risk Management Procedure, UM/HSE/SE/01 	Complied

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<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p>	<p>A mechanism on checking the consistency of estate and mill implementation of their procedures were in place. Among the mechanism such as Mill/Plantation Advisor Visit, Performance Monitoring Visit, SORA/SCRA visit, Agronomist visit and Internal Audit.</p> <p>Mechanism to check consistent implementation of procedures were not effectively demonstrated as per the following evidence.</p> <p><u>Bukit Puteri Estate</u></p> <p>Site visit carried out at house# E25 (division B), damage complaint recorded in OPP against actual condition for main and room doorknob broken and bathroom water tub/container leaking were verified. Risk category rated as "low" however based on Appendix C; Recommended timeline for repair completion it should be rated as high for the main door broken and water tank leakage issue.</p> <p>For house# A8, in the OPP tracker/summary, damage complaint made on 24/1/23 for broken ceiling, electrical plug point and no water supply for kitchen sink. Repair work completed on 18/2/23 and updated in OPP tracker/summary. Based on interview with house# A8 owner has confirmed that repair work has yet to be completed. Status reported in OPP tracker/summary was found to be inconsistent with the actual status as to date.</p> <p><u>Bukit Puteri POM</u></p> <p>During site at house# J101, it was found that outlet pipe blocked due to modification of new V-drain and causing stagnant water at the parameter drain. Based on latest (housing complex/nest/community hall weekly inspections (PIOA) dated 25/3/23, this was not reflected in the inspection sheet.</p> <p>Reference:</p>	<p>Non-compliance</p>
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		<p>i) Workers Housing Management Procedure version 1, dated 30/6/2022, Appendix C; Recommended timeline for repair completion</p> <p>ii) 'Oil PalmPal' Digital Housing Complaint System (OPP DHCS).</p> <p>Thus, a minor non-conformity was raised</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>The operating units maintain all the records of monitoring and actions taken for all issues raised during the visit. Reviewed the monitoring records as follows:</p> <p><u>Bukit Puteri POM</u></p> <ol style="list-style-type: none"> 1. Internal Audit Report: 07/02/2023 2. Structured Oil Recovery Assessment: 25 – 28/10/2022 3. HSE Fly-by & Validation (HSE UM & RSQM Checklist and Reporting: 30/03/2023 <p><u>Bukit Puteri Estate</u></p> <ol style="list-style-type: none"> 1. Internal Audit Report dated 07/02/2023. 2. PPE Checklist 3. Contractor Due Diligence Monitoring Checklist 4. Work Site Inspection dated 09/12/2022. 	Complied
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>Environmental Aspect Impact (EAI) SOU 10 Bukit Puteri Estate and Bukit Puteri POM has been prepared FY 2023 dated 02/03/2023. Reference number EAI/2023/03/05. Among the activities listed and verified were:</p> <p><u>Bukit Puteri Estate</u></p> <ol style="list-style-type: none"> 1. Welding 	Complied

		<p>2. Tractor / vehicle in the estate 3. Storage and disposal of Schedule waste</p> <p><u>Bukit Puteri POM</u></p> <p>1. Boiler 2. Vehicle entering 3. POME</p> <p>Environmental Impact Evaluation Form (EIE) SOU 10 Bukit Puteri Estate and Bukit Puteri POM has been prepared dated 08/01/2022. Reference number EAI/2022/ENT. Among the activities listed and verified were:</p> <p><u>Bukit Puteri Estate</u></p> <p>1. Store Cleaning 2. Maintenance Equipment 3. Grinding</p> <p><u>Bukit Puteri POM</u></p> <p>1. Steriliser 2. Chemical handling 3. Laboratory</p> <p>No new planting in all estates within SOU 10. Social impact assessment (SIA) was carried out on 17 – 18/09/2015 for SOU 10 Bukit Puteri POM and Bukit Puteri Estate by Social & Environment Projects Unit, Sustainability Compliance Unit, Group Sustainability Management formerly known as PSQM Department. The methodology of the assessment was through field interview with stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, officers from government authorities and internal workers. For existing operations, the operating unit of SOU 10 has</p>	
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		<p>documented the continual improvement plan for social in the Social Management Plan. Identified main social aspects and impacts from SIA considered in the plan including the following categories:</p> <ul style="list-style-type: none"> - Workers’ Housing Condition/Living Improvement - Workers’ Working Condition - External stakeholders feedbacks <p>Improvements conducted by individual operating units within SOU 10 including housing improvement programs, minimum wages achievement monitoring and community contribution programs.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Bukit Puteri estate and Bukit Puteri POM has established Environment Management Plan 2023. The monitoring of the plan has been developed with participation of affected stakeholders. The assessment has involved the affected stakeholders such as contractors, officers from government authorities and internal workers. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community, education, safety, and health, living condition, infrastructure and amenities and stakeholder engagement were assessed accordingly.</p> <p>SOU 10 Bukit Puteri has a separate Social Impact Assessment (SIA) and Environmental Impact Assessment reports. It mentioned the objectives, category, action, frequency, person in charge and monitoring period.</p> <p>Among others as summarized below:</p> <p>a) To ensure compliance to SOP and legal requirement regarding social (appointment of person in charge/committee to handle social matters, communication on policies/SOP on social to relevant stakeholders, monitoring of pay and agreement of workers and contractor’s workers and to maintain housing and facilities provided</p>	Complied

		<p>to workers). based on inputs received from external stakeholders during stakeholder meetings, union meetings, EWC meetings, and Gender Committee</p> <p>b) To contribute to local communities development based on inputs received from external stakeholders during stakeholder meetings, union meetings, EWC meetings, and Gender Committee meetings.</p> <p>c) Among the issues considered with the stakeholders include: There is no new planting in SOU 10 (Bukit Puteri POM Certification Unit). Methodology of assessment is based on interview at workstation for harvesters, sprayers, union representatives, gender committee, contractor, supplier, local community, neighbouring estate, government & School. The secondary data collection – document review/file checking also been made. Main aspects/concerns identified by the assessor: Housing condition/living improvement and Working condition</p>	
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>The management plan established base on operation with significant impact to the environment. The management plan was reviewed annually. The management plan stated the environmental issue, mitigation actions, monitoring plan and person responsible for monitoring implementation.</p> <p>The Social Impact Assessment Management Plan available for each unit were made available and having information i.e., issues, management plan, PIC, and time frame. The inputs gathered from the meeting minutes as per the following;</p> <p>a) Gender Committee (once every 2 months), NUPW @ Union meeting (at least once a year)</p> <p>b) Safety Meeting (quarterly)</p> <p>c) Complaint & Request from internal & external stakeholders</p>	Complied

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		<p>d) and muster briefing). e) Stakeholders meeting (annual meeting) f) Social dialog (every fortnight), EWC (Employee Welfare Committee – quarterly)</p> <p>The inputs will be used to monitor the performance of the established plan and to review and update the plan in a participatory way. For effective monitoring purposes, SDTS @ Social Dialog Tracking System is used to keep track all open issues highlighted during social dialog. As at 4/4/23, only 6 pending issues were recorded in SDTS, and status is in progress with target completion by 30/4/2023. OPP/OilPalmPal @ Digital Housing Complaint System, 7 open house complaints recorded with target completion by 2nd week of April 2023.</p>	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>The Human Resource Department in HQ has established Hiring of Local Workers procedure (Doc. No.: 01-12-19) dated 01/12/2019 and Migrant Worker Responsible Recruitment Procedure dated 20/08/2021 to explain the recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried out by recruitment agents in Malaysia and origin countries to assist in the recruitment drive and manage local processing of documents.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Application form, employment interview assessment form, medical check-up report and employment contract was sighted for new recruited employees. The latest recruitment of workers (local) in Bukit Puteri Estate was on 17/01/2023. All related personal and induction records were kept for reference (identity card, PDPA declaration, briefing. Interviewed with the clerk confirmed that if there is any job vacancy available, they will publish job vacancy advertisement/flyer at the places nearby the villages.</p>	Complied

Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.		
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad have established OSH Risk Management Procedure UM/HSE/SP/01 effective date 09 March 2021. Risk were identified and assessed in accordance to the established HIRARC an also incompliance to legal requirements as stated below.</p> <p><u>Bukit Puteri Palm Oil Mill</u></p> <ol style="list-style-type: none"> 1. HIRARC was available to address all the risks and hazards associated to the operations in the estate. The HIRARC was reviewed on 09/03/2022. 2. Chemical Health Risk Assessment was conducted in the mill in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000. CHRA Report Reference Number: HQ/14/ASS/00/00001-2020/8; CHRA Assessor: Mohamad Khairil Azhar Bin Mohd Salim; DOSH Reg Number: HQ/14/ASS/00/358; Date of Assessment: 10/06/2020. 3. Medical Surveillance Programme has been performed successfully for the year 2022 for the mill workers exposed to hazardous chemicals and fumes. A total of 9 workers have been examined on 29 - 30/03/2022 at Klinik Sulaiman. The results indicated that there were 1 worker recommended for medical removal protection due to manganese exposure. The worker was removed from manganese related job from 26/04/2022 – 26/07/2022. A retest was conducted on 26/07/2022 at Klinik Sulaiman and the workers was declared fit to work. 4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. Noise Risk Assessment (NRA) has been conducted by Hitec Iesh Holding (M) Sdn Bhd on 04/07/2020 and 02/02/2021. NRA

Complied

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		<p>Report (Report Number: HQ/11/PEB/00/118-OM) available for verification. The recommendation stated by the assessor have been affectively addressed as verified.</p> <p>5. An audiometric testing was done on 25/07/2022 for 80 mill employees deemed to be exposed to excessive noise in the mill. The test was conducted by Hitec Environmental Science Technologists Plt. The report indicated that 13 workers had Standard threshold shift. The workers with STS have been sent for a retest on 02/08/2022. The results were obtained and indicated that STS was confirmed. The mill has reported the cases via JKKP7 to DOSH.</p> <p><u>Bukit Puteri Estates</u></p> <p>1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Harvesting, Spraying, Manuring and Office Operations. Verification done on the documentations and operations indicated that all the risk controls were adhered to.</p> <p>2. Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The Chemical Health Risk Assessment Report (Ref. Number: HQ/14/ASS/00/00001-202-/13) conducted by Azhar Hazardous Chemical Consultancy (DOSHS Registration: HQ/14/ASS/00/358) on 10 June 2020 was available for verification.</p> <p>3. Medical Surveillance were conducted in the estate based on the recommendation of the CHRA for workers exposed to hazardous chemicals. Results of annual medical surveillance were available in the estates for verification as follows.</p>	
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		<p>The medical surveillance programme for the year 2022 has been performed on 17/03/2022 at Klinik Chung for 50 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work.</p> <p>4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA Report were available for verification at all the sampled sites. The recommendation stated by the assessor have been affectively addressed as verified.</p> <p>Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the estates. The assessment was conducted on 24/09/2021 by SH Safety Consultancy Sdn Bhd. The assessment report (Ref. No: PH/04/04/556) was available for verification.</p> <p>5. Audiometric Testing was done in the estates based on the recommendation provided in the Noise Risk Assessment in compliance with OSHA 1994 – OSH (NOISE Exposure) Regulations 2019. it was done on for 80 workers deemed to be exposed to excessive noise in the estate. The results indicated that 19 workers had hearing loss, 8 workers with hearing impairment and 13 workers with standard threshold sift. Retest has been conducted for the workers with STS on 03/04/2023.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>Annual Health and Safety Plan available for the estate and mill are mostly implemented through Annual Training Program 2022 and monitored via inspections to address the identified health and safety risks. The emphasis is on safe work by providing,</p> <ul style="list-style-type: none"> ▪ Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk. 	Complied

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		<ul style="list-style-type: none"> ▪ Awareness and understanding of workplace hazards and how to identify, report, and control them. ▪ Specialized training when their work involves unique hazards. <p>Besides formal classroom training, other means include on-the-job training and worksite demonstrations to effectively convey safety concepts, ensuring understanding of hazards and their controls, and promoting good work practices.</p> <p>The safety performance of each Operating Unit is monitored via:</p> <ul style="list-style-type: none"> • Internal Audit conducted by the Sustainability Department. • Work Site Inspection (WSI) by site OSH Committee. • Direct involvement of supervisor and rounds by Asst Manager. • Safety incidents reporting via Rapid4. • Health / medical surveillance. • Chemical exposure monitoring, and • Audiometric Monitoring • Daily Monitoring Checklist such as PPE Checklist <p>The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken.</p>	
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units visited has conducted training need analysis for all employee, management, and contractors. The need analysis was conducted based on the job designation and training required by the job type.</p> <p>Trainings was identified for management, employee and contractors and programmed throughout FY 2023. The training identified covers the safety and health, environmental and social aspect.</p>	<p>Complied</p>

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		<p>Means implemented by SOU 10 certification units were to assess understanding of participants include:</p> <ul style="list-style-type: none"> • Participants completing post-training evaluation/feedback form and give suggestions. • Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended. <p>Random interviews with workers showed that they understood what RSPO is, the several subsidiaries' policies, what does their work/job SOP states and the consequences if deviated, the need to put on PPE and demonstrate donning PPE and when it should be changed, the use of fire extinguishers, understanding workplace hazards, risks and needed control measures, Covid-19 Safe Practices. etc.</p>																			
<p>3.7.2</p>	<p>Records of training are maintained. - Minor Compliance -</p>	<p>The operating units maintained the training records conducted. Reviewed the training records as follows:</p> <p><u>Bukit Puteri POM</u></p> <table border="1" data-bbox="1151 906 1928 1383"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Hearing Conservation Training</td> <td>12/08/2022</td> </tr> <tr> <td>Safety Harness Training</td> <td>15/07/2022</td> </tr> <tr> <td>Accident & Incident Investigation Training</td> <td>11/10/2022</td> </tr> <tr> <td>Sexual Harassment, Intimidation, and Isolation training</td> <td>14/10/2022</td> </tr> <tr> <td>Confined Space Training</td> <td>19/09/2022</td> </tr> <tr> <td>Grievance Channel Briefing</td> <td>01/04/2022</td> </tr> <tr> <td>HIRARC Training</td> <td>14/09/2-22</td> </tr> <tr> <td>PPE Training</td> <td>15/07/2022</td> </tr> </tbody> </table>	Training	Date	Hearing Conservation Training	12/08/2022	Safety Harness Training	15/07/2022	Accident & Incident Investigation Training	11/10/2022	Sexual Harassment, Intimidation, and Isolation training	14/10/2022	Confined Space Training	19/09/2022	Grievance Channel Briefing	01/04/2022	HIRARC Training	14/09/2-22	PPE Training	15/07/2022	<p>Complied</p>
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<p>3.7.3</p>	<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>Training conducted from time to time to all personnel critical in SCCS effective implementation. Latest training was conducted by Regional Sustainability & Quality Management (RSQM) personnel, attended Bukit Puteri Mill Manager, Assistant Mill Manager, Lab Supervisor, Lab Despatch Operator, Weighbridge Clerk and Auxiliary Police. Refer Training record dated 17/03/2023.</p>	<p>Complied</p>																				
<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>																							
<p>3.8.1</p>	<p>Identity Preserved Module 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</p>	<p>Bukit Puteri POM is under mass balance module. Thus, this indicator is not applicable.</p>	<p>Not Applicable</p>																				

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	<p>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>						
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>	Bukit Puteri POM received and processed both RSPO certified and uncertified FFB from plantations/estates, outgrowers and FFB Traders and claim only the volume of oil palm products produced from processing of the certified FFB as MB certified.	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>	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. The actual tonnage produced from last audit date is reported in the summary in Table 7 and Table 10.	Complied				
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows:</p> <table border="1"> <tr> <td>Member Name</td> <td>Bukit Puteri Oil Mill</td> </tr> <tr> <td>Member ID</td> <td>RSPO_PO1000000192</td> </tr> </table>	Member Name	Bukit Puteri Oil Mill	Member ID	RSPO_PO1000000192	Complied
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		RSPO Membership Number	1-0008-04-000-00 (Sime Darby Plantation Berhad)	
		Type of Business	Oil mill	
		Issued On	15/10/2022	
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>Documented Procedures were made available for verification and the requirements have been adhered to as follows:</p> <ul style="list-style-type: none"> a) Refer Sustainable Supply chain and Traceability Procedure dated 01/06/2022 with reference number SD/SDP/GSD/SCCS/0522/01. b) Complete and up to date records and reports in relation to RSPO SCCS were maintained and available for verification. Among the records available were Mass Balance Sheet, Internal Audit Reports, and SCCS Training records. c) Mill have identified and appointed the Mill Manager as the PIC for RSPO Supply Chain Certification Standard requirements as stated in Sustainable Supply chain and Traceability Procedure dated 01/06/2022 Section 4.0 Responsibilities. <p>Procedures for receiving and processing certified and non-certified FFBs were addressed in the Sustainable Supply chain and Traceability Procedure dated 01/06/2022 Section 7.0 Receiving FFB at the Mill.</p>	Complied	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: 	<p>The procedure to conduct annual internal audit is addressed in the Sustainable Supply chain and Traceability Procedure dated 01/06/2022. Refer section 18.0 Internal Audit.</p> <p>Refer latest SCCS Internal Audit dated 07/02/2023. Based on the internal audit report and checklist, the elements of RSPO supply chain were adequately covered including the RSPO Market</p>	Complied	

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	<p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Communications and Claims elements. There was no non-conformity raised from the internal audit. Should there be any non-conformity, corrective action shall be established to rectify the lapse found. The status of the non-conformity shall also be discussed in the management review meeting.</p>	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>Bukit Puteri POM maintain the daily records of all certified and uncertified FFB received and documented in daily processing records. The records include the FFB suppliers, weight, and vehicle transportation details. The mill has maintained records of FFB received such as Delivery Notes and Weighbridge operator. Sample of FFB delivery records:</p> <p>Incoming FFB Certified Supply Base Company: Sime Darby</p> <ul style="list-style-type: none"> • Estate: Bukit Puteri Estate • Certified No: RSPO 746403 • Date: 31/03/2023 • Ticket Number: 151978 • Vehicle Number: L8-BPE4 • Field / Block: P 2013A • FFB Weight: 2.11 MT 	<p>Complied</p>

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		<p>Non-Certified 3rd Party FFB</p> <ul style="list-style-type: none"> • Company: Cx Txxx Enterprise Sdn Bhd • Estate: Cx Txxx ENT Estate • Date: 31/03/2023 • Ticket Number: 151974 • Vehicle Number: CDW 3692 • FFB Weight: 4.44 <p>Non-Certified 3rd Party FFB</p> <ul style="list-style-type: none"> • Company: Pxxxx Pxxx Sdn Bhd • Estate: Pxxxx Pxxx Estate • Date: 21/02/2023 • Ticket Number: 150853 • Vehicle Number: JKK 1775 • FFB Weight: 2.17 <p>Mechanism to handle non-conforming FFB and documents has been detailed up in the Procedure Sustainable Supply chain and Traceability Procedure dated 01/06/2022 Section 11.0.</p>	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <p>a) The name and address of the buyer;</p>	<p>Bukit Puteri POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</p> <p>CPO - MB</p> <p>a) The name and address of the buyer; BUYERXXXXXX</p> <p>b) The name and address of the seller; Bukit Puteri POM</p> <p>c) The loading or shipment / delivery date; 22/03/2023</p> <p>d) The date on which the documents were issued; 22/03/2023</p>	Complied

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	<ul style="list-style-type: none"> b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<ul style="list-style-type: none"> e) RSPO Certificate Number: RSPO 746403 f) A description of the product: CPO MB g) The quantity of the products delivered; 38.05 Mt h) Any related transport documentation; NDG 4087 i) A unique identification number: 005847 <p>PK - MB</p> <ul style="list-style-type: none"> a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; Bukit Puteri POM c) The loading or shipment / delivery date; 28/12/2022 d) The date on which the documents were issued; 28/12/2022 e) RSPO Certificate Number: RSPO 746403 f) A description of the product: PK MB g) The quantity of the products delivered; 28.27 Mt h) Any related transport documentation; KEN5788 i) A unique identification number: 005769 	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes 	<p>Bukit Puteri POM has established Standard Operating Procedure related Outsourcing Activities. Refer Sustainable Supply chain and Traceability Procedure dated 01/06/2022 with reference number SD/SDP/GSD/SCCS/0522/01 Section 13.0.</p> <ul style="list-style-type: none"> i. Stated in the SOP, CPO mill cannot outsource processing activities like refining or crushing. Outsourcing activities for Bukit Puteri POM was for CPO and PK transportation. ii. Sighted the contract agreement between Sime Darby Plantation Berhad and contractor; <ul style="list-style-type: none"> a) Bukit Puteri POM has legal ownership of all input material to be included in the outsourced process. Refer listing of FFB 	Complied

	<ul style="list-style-type: none"> b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance. 	<p>Supplier Certified and Non-Certified. The contract agreement and details like MPOB licence were kept in the file.</p> <ul style="list-style-type: none"> b) Refer Contract Agreement between Sime Darby Plantation Berhad and XXXX EE (M) Sdn. Bhd. – Agreement on the Transportation of Crude Palm Oil (CPO) for Sime Darby Plantation Berhad’s Peninsular Malaysia Oil Mills; Initial term: 3 years commencing from 1/11/2020 and expiring on 31/10/2023 c) The mill trades CSPO and CSPK with its buyers among refineries and/or oleo-chemical plants. Based on agreements, transporter has no ownership of transported products and owned by buyer. <p>The contract agreements specified that all transporters are required to fulfil and comply with applicable legal requirements. Refer Section 8.0 Obligation, Undertakings and Covenants Of The Transporter.</p>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Names and contact details of transporters used for the physical handling of RSPO certified oil palm products were recorded and registered in the mill supplier database system. The independent third parties involve in Mill operation is only transportation services for CPO and PK.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	There is no new contractors used for the handling of certified CPO and PK. As per stated in the procedure Section 13.5 “The Mill shall inform in advance the outsourced contractors if audit is deemed necessary by Certification Bodies (CB) and ensure that the contractors engaged provide relevant access for the CBs to their respective operations, system, and any and all information, when this is announced in advance.”	Complied

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<p>3.8.12</p>	<p>Record keeping</p> <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock. 	<p>Record Keeping</p> <ul style="list-style-type: none"> i) All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible. ii) The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 in Sustainable Supply Chain and Traceability Procedure (2022); Document ID: SD/SDP/GSD/SCCS/0522/01. iii) NA as the mill is using MB model iv) For Mass Balance Module, The mill has delivered mass Balance sales from a negative stock. Based on the verification of the Mill’s PK Production and PK Sales registered in RSPO PalmTrace for the period under review (Apr 2022 to Mar 2023), it was found that the mill has sold PK from a negative stock for 6 consecutive months, Aug 2022 – Dec 2022. As of to date (Mar 2023), the mass balance record still recorded negative balance. (- 176.01 mt) Hence, a major non-conformity was raised. 	<p>Non-compliance</p>									
<p>3.8.13</p>	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Verified OER and KER as below.</p> <table border="1" data-bbox="1153 1225 1944 1372"> <thead> <tr> <th>Month</th> <th>OER</th> <th>KER</th> </tr> </thead> <tbody> <tr> <td>Apr-22</td> <td>21.52</td> <td>4.34</td> </tr> <tr> <td>May-22</td> <td>21.96</td> <td>4.31</td> </tr> </tbody> </table>	Month	OER	KER	Apr-22	21.52	4.34	May-22	21.96	4.31	<p>Complied</p>
Month	OER	KER										
Apr-22	21.52	4.34										
May-22	21.96	4.31										

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		<table border="1"> <tr><td>Jun-22</td><td>22.00</td><td>4.32</td></tr> <tr><td>Jul-22</td><td>21.80</td><td>3.68</td></tr> <tr><td>Aug-22</td><td>20.68</td><td>4.26</td></tr> <tr><td>Sep-22</td><td>21.06</td><td>4.06</td></tr> <tr><td>Oct-22</td><td>21.57</td><td>3.88</td></tr> <tr><td>Nov-22</td><td>21.66</td><td>4.38</td></tr> <tr><td>Dec-22</td><td>20.79</td><td>4.94</td></tr> <tr><td>Jan-23</td><td>21.08</td><td>4.87</td></tr> <tr><td>Feb-23</td><td>20.34</td><td>3.57</td></tr> <tr><td>Mar-23</td><td>20.79</td><td>4.37</td></tr> </table>	Jun-22	22.00	4.32	Jul-22	21.80	3.68	Aug-22	20.68	4.26	Sep-22	21.06	4.06	Oct-22	21.57	3.88	Nov-22	21.66	4.38	Dec-22	20.79	4.94	Jan-23	21.08	4.87	Feb-23	20.34	3.57	Mar-23	20.79	4.37	
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3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Bukit Puteri POM derives the extraction rates based on the actual extraction rate produced in the mill. Therefore, the accuracy is continuously maintained.	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 using MB module.	Complied																														
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to 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>Registration of transactions</p> <p>i) The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Verified the registration of CPO Sale (Contract Number: S/CCE/2206/CPO0016; Date of</p>	Complied																														

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	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.	despatch: 14/06/2022; Palmtrace Announcement Date: 13/07/2022. ii) RSPO certified volumes sold under different scheme or as conventional were not registered in the RSPO PalmTrace.	
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not used. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	The Sime Darby Plantation Berhad website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil. The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications.	Complied
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.	The Sime Darby Plantation Berhad website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil. The website had not displayed the RSPO website and had not display any RSPO Trademark.	Complied
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications and selling of its oils are considered RSPO certified.	Complied

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4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	The Sime Darby Plantation Berhad website was reviewed and confirm the communications are mainly on the efforts and commitments of SDP towards production of sustainable palm oil. The website has published reports, statements, policies, procedures and performances of such implementation. The website did not specifically publish its product as RSPO certified product.	Complied
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.	No evidence of RSPO corporate logo used by Bukit Puteri POM and verified through document and site review (notice board, business card, shipping documentation, etc.	Complied
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.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. Verified the weighbridge tickets to buyer where claim of CSPO (Mass Balance) was stamped on the tickets.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that the product is CSPO (Mass Balance) with RSPO certificate number: RSPO 746403. Verified the documents found that the supply chain model and certificate number were stated on the ticket.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or	Not applicable since Bukit Puteri POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable

	<p>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>		
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	Oil palm content for CPO and PK is 100% RSPO MB certified. Non-certified FFB is come from external crop and since Bukit Puteri POM is using Mass Balance module, the non-certified volume is covered in the Mass Balance sheet.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Bukit Puteri POM only applies MB model and the conventional CPO are downgraded from MB whenever demanded. Non-certified FFB is come from external crop and since Bukit Puteri POM is using Mass Balance module, the non-certified volume is covered in the Mass Balance sheet.	Complied
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> Surrounded by the text: 'Certified sustainable palm oil'. The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. 	Bukit Puteri POM is producing crude palm product and does not involve in any labelling of end product.	Complied

	<ul style="list-style-type: none"> 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>No RSPO label and storytelling in product-related communications used as CPO and PK is semi-finished product. No messaging involved since Bukit Puteri POM is producing crude palm product and does not involve in any labelling of end product.</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.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and</p>	<p>Sime Darby Plantation Berhad has established Group Sustainability & Quality Policy Statement dated 02/12/2019 approved by Group</p>	<p>Complied</p>

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	<p>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>Managing Director where the company is respecting, upholding & no exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC) latest revised in 2020.</p> <p>Besides, Policy on the Protection of Human Rights Defenders (HRDs) was established with effective date on 25/03/2020. Sime Darby Plantation Berhad respect and safeguard human rights, notion of democracy and its institution. They recognize that Human Rights Defenders have the role and responsibility of upholding human rights and the need for them to be able to lodge complaints that may arise from their business activities and relationship with SDP.</p> <p>The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the estate. sighted as sample training was conducted by Bukit Puteri Estate on 3/3/2023 - Induction Course to Newly Joined workers, COBC Briefing, SD Policy Charter, Grievance Channel, Agreement Briefing, Sexual Harassment Briefing, PDPA and etc.</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Based on the interview of internal stakeholders among workers as well relevant external stakeholders, the estates within SOU 10 do not instigate violence or use any form of harassment in their operations</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 Plantation Berhad has developed Human Rights Charter last revised 2020 where they believe everyone has the responsibility to promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognise the important role Human Rights Defenders, whistle blowers, complainants and community spokespersons play by lodging complaints in confidence.</p>	Complied

<p>4.2.2</p>	<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 Plantation Berhad has implemented Grievances Response Standard Operating Procedure dated 18/07/2022. The complaints and grievances are open to effected parties including internal and external stakeholders. The time frame to deal with internal and external communications has been detailed in the Section 2.2. Flow chart procedure and 3.3 The time scale of investigation.</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.simedarby.com/operating-responsibly/whistleblowing</p> <p>The company has implemented "Suara Kami" as a platform for the workers to raise any issue. The workers in Bukit Puteri Estate were briefed on the complaint mechanism during morning muster on 29/3/2023. Besides, external stakeholders were briefed during the stakeholder meeting. Interviewed with the internal and external stakeholders confirmed that they have been briefed and understood on the complaint mechanism implemented by the company. The latest initiative introduced (Impact Worker Helpline) effective from 27/8/2021.</p>	<p>Complied</p>
<p>4.2.3</p>	<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 Berhad has implemented Grievances Response Standard Operating Procedure dated 18/07/2022.</p> <p>The complaints and grievances are open to effected parties including internal and external stakeholders. The time frame to deal with internal and external communications has been detailed in the Section 2.2. Flow chart procedure and 3.3 The time scale of investigation. The latest training was carried out on 29/3/2023.</p> <p>Grievance channels was stated in the employment contract (Item 21) as follows:-</p> <ul style="list-style-type: none"> • Union representative at operating unit. 	<p>Complied</p>

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		<ul style="list-style-type: none"> • Worker’s helpline at 0162991411 (via WhatsApp) and call toll free number 1800819741. • Suara Kami at 1800818771 or SMS 01130116031. • Whistleblowing channel at 1800223388 or +60192797553 (08.30 am – 17.30 pm) or email to whistleblowing@simedarbyplantation.com <p>Related grievance/request based on related records at respective OU:</p> <ul style="list-style-type: none"> - Bukit Puteri POM: Social Dialogue; Minutes of Meeting for Social Dialogue; Date: 15/3/2023, no complaint reported, two (2) requests recorded in the minute. - Bukit Puteri Estate: Social Dialogue; Minutes of Meeting for Social Dialogue; Date: 24/3/2023, no complaint reported, one (1) request recorded in the minute. <p>No grievance found and all requests found to be responded within short time by respective recipients mainly workers as verified during on-site consultation.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has implemented Grievances Response Standard Operating Procedure dated 18/07/2022 documented the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow</p>	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Contributions made as per sample as following:</p> <ul style="list-style-type: none"> i) SOU10 Sports Day ii) (Oil Extraction rate) OER Achiever event for 2022 achievement (appreciation day) 	Complied

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		<p>iii) Religious event initiated by gender committee (<i>Kem Solat dan Sambutan Hari Israk dan Mikraj</i>)</p> <p>iv) School donation for beautification project (SK Kampong Keledek)</p>	
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Copies of land titles were available and verified. Details of the respective land titles (sample) to demonstrate the right to use the land as shown below. Quit rents were paid accordingly. There was no evidence of any part of the land overlapping with customary landowners. There is total 7 land titles in Bukit Puteri Estate and the estate able to show legal ownership on the use of land. Sampled the land title as below:</p> <ol style="list-style-type: none"> 1. Land title No.: 238; Lot No.: PT 1277; 728.433 hectares 2. Land title No.: 30; Lot No.: PT 856; 809.37 hectares 	Complied
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>There was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.</p>	Complied
4.4.2a	<p>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.</p> <p>- Minor compliance -</p>	<p>There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.4.2b	<p>Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.</p> <p>- Minor compliance -</p>	<p>There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied

4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information.	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 was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information.	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 was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information.	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 was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information.	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 planting and issues of customary land occurs in all estates within SOU 10 that requires FPIC process and compensation since	Complied

		the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	
4.5.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	No new planting and issues of customary land occurs in all estates within SOU 10 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	No new planting and issues of customary land occurs in all estates within SOU 10 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	No new planting and issues of customary land occurs in all estates within SOU 10 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p>	No new planting and issues of customary land occurs in all estates within SOU 10 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied

	- Minor compliance -		
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 planting and issues of customary land occurs in all estates within SOU 10 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 10 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within SOU 10 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(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 -	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented,	Addressed in the SOP as mentioned in Indicator 4.6.1.	Complied

	monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -		
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	No new planting and issues of customary land occurs in all estates There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	No new planting and issues of customary land occurs in all estates There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information	Complied
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.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
4.7.2	(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 -	Addressed in the SOP as mentioned in Indicator 4.7.1.	Complied

4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>There was no community that had lost access and rights to land as well as no expansion of plantation by the certification unit.</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.</p> <p>- Minor compliance -</p>	<p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.</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 involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.</p>	Complied
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	<p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.</p>	Complied
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p>	<p>Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any</p>	Complied

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	- Minor compliance -	issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	
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. As the mill is using MB module, the mill received both certified and non-certified FFB. Nonetheless, with regards to non-certified FFB, the suppliers are only those from plantations and collection centres. The FFB supplier were listed in the Bukit Puteri POM FFB Supplier list.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Explanation of FFB pricing was done during the signing of contracts. Evidence of explanation has been given was kept and made available for verification. The latest session with OCP was carried out on 8/12/22.	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	The FFB pricing was stated in Section 8 of the contract, Pricing of FFB under Third Schedule. The calculation method of the pricing was basically influenced by MPOB market price. Verification of the contract agreements showed that all the FFB suppliers have agreed with the pricing through signing. Interview with OCP has confirmed on the pricing mechanism documented as per signed contract.	Complied
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the	No binding contract between the mill and out-growers which includes finance, loans/credit and repayment through FFB price reduction for	Not Applicable

	contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	replanting and/or other support mechanisms. Thus, this indicator is not applicable.							
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Verification of the terms and conditions of the sampled contracts showed that the contracts were fair, legal and made transparent to the contractors. The agreed timeframe of the contract was stated under Section 5 of the first schedule in the contract.	Complied						
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Payments are broken down as defined under the First Schedule/Attachment 1 of the agreed contract. The payments were handled at HQ level and based on verification of the payment vouchers; the payments were made on timely manner. Review of sample payment for PXXXXX PXXX Sdn Bhd (contract no. P/C/1222/FFB04077L) as per payment document reference C/ADVCH-015645 dated 28/03/2023. Clearing date was on 3/4/2023	Complied						
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Weighbridges were calibrated annually, and evidence of calibration certificates were available as below. <table border="1" data-bbox="1137 979 1928 1145"> <thead> <tr> <th>Weighbridge</th> <th>Date of stamping</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>MPK(E) 60,000 kg Mettler Toledo IND 246</td> <td>18/4/2022</td> <td>Calibration ref. C3- ATK-00019, serial no. C037051237</td> </tr> </tbody> </table>	Weighbridge	Date of stamping	Remarks	MPK(E) 60,000 kg Mettler Toledo IND 246	18/4/2022	Calibration ref. C3- ATK-00019, serial no. C037051237	Complied
Weighbridge	Date of stamping	Remarks							
MPK(E) 60,000 kg Mettler Toledo IND 246	18/4/2022	Calibration ref. C3- ATK-00019, serial no. C037051237							
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	N/A as no independent smallholders within the certification unit.	Not Applicable						

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5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	NA as no independent smallholders within the certification unit.	Not Applicable
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	There are no smallholders under the SOU 10 Bukit Puteri POM and Supply Base certification units. As the mill is using MB module, the mill received both certified and non-certified FFB. Nonetheless, with regards to non-certified FFB, the suppliers are only those from plantations and collection centres. The FFB supplier were listed in the Bukit Puteri POM FFB Supplier list.	Complied
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	There are no smallholders under the SOU 10 Bukit Puteri POM and Supply Base certification units. As the mill is using MB module, the mill received both certified and non-certified FFB. Nonetheless, with regards to non-certified FFB, the suppliers are only those from plantations and collection centres. The FFB supplier were listed in the Bukit Puteri POM FFB Supplier list.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There are no smallholders under the SOU 10 Bukit Puteri POM and Supply Base certification units. As the mill is using MB module, the mill received both certified and non-certified FFB. Nonetheless, with regards to non-certified FFB, the suppliers are only those from plantations and collection centres. The FFB supplier were listed in the Bukit Puteri POM FFB Supplier list.	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There are no smallholders under the SOU 10 Bukit Puteri POM and Supply Base certification units. As the mill is using MB module, the mill received both certified and non-certified FFB. Nonetheless, with regards to non-certified FFB, the suppliers are only those from plantations and collection centres. The FFB supplier were listed in the Bukit Puteri POM FFB Supplier list.	Complied

5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>There are no smallholders under the SOU 10 Bukit Puteri POM and Supply Base certification units. As the mill is using MB module, the mill received both certified and non-certified FFB. Nonetheless, with regards to non-certified FFB, the suppliers are only those from plantations and collection centres. The FFB supplier were listed in the Bukit Puteri POM FFB Supplier list.</p>	Complied
<p>Principle 6: Respect workers’ rights and conditions</p>			
<p>Criterion 6.1: Any form of discrimination is prohibited.</p>			
6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Bethad has developed Human Rights Charter to ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at work and providing a platform for workers’ voice and social dialogue. They respect the rights of workers and provide fair and favourable working conditions by Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation, or age. They will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy could be downloaded from https://www.simedarbyplantation.com/sustainability/human-rights-charter</p>	Complied
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Interviewed with the workers comprises of different gender and nationalities as well as the parolees confirmed that no discrimination has reported. The management treated all equally such as provided free accommodation and medical to all the workers, no charging of recruitment fees for the foreign workers and offered job based on</p>	Complied

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		<p>capability. The worker can request for job transfer if they found they unfit for the job assigned to them.</p> <p>Based on group interview with a group of workers consist of (gender committee, workers representatives and union representatives), all of them have not been discriminated against including charging of recruitment fees for foreign workers.</p>	
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has developed a Career Progression for Workers Level (both local and foreign workers), Doc. No.: SDP/HRUM/2020/SOP01 where the promotion of workers is based on the work performance, suitability, and the leadership quality of the worker. The recruitment of foreign workers is through Human Resource Department in HQ based the regulation requirements.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Interviewed with the female employees in Bukit Puteri Palm Oil Mill and Bukit Puteri Estate has confirmed that pregnancy testing is not conducted prior to work. There was no specific clause in the contract mentioning on the requirement for pregnancy testing. They still will be able to offer for work if they are pregnant.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly. Sime Darby Plantation Berhad has introduced the new Terms of Reference (TOR) for Gender Representatives and Gender Committee, dated March 2021 which supersede the previous Gender Committees Gender Committee Handbook, First Edition 2014. In this new TOR, a more definitive roles, and responsibilities as well as governance structure and programmes were added in.</p> <p>Gender Committee were established by the mill and estate management and verified at each operating unit. Meetings conducted once every 2 months or whenever necessary and for SOU gender</p>	Complied

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		representative carried out on monthly basis. Meetings conducted at respective units as below: SOU10 meeting: 21/2/23, 23/12/22, 12/10/22, 16/8/22. There was no sexual harassment case reported so far at all OU.	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Based on the sampled payslips, which consists of both genders, it was noted that workers were paid equally for the same job scope. They were paid according to the Minimum Wage Order 2022 without any form of discrimination. This was also evident through interview with sampled workers	Complied
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	Sime Darby Plantation Berhad 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). Upon the foreign workers arriving at 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.	Complied
6.2.2	(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. - Critical (Major) compliance -	Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. The terms are in compliance with the Employment Act 1955, Minimum Wages Order 2022, SOCSO Act 1969, EPF Act 1991, EIS Act 2017, and the MAPA/NUPW agreement. Payroll documents, namely the payslip, also give accurate information on compensation for all work done. This includes those who receive	Complied

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		<p>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 (SOCSCO, EPF, EIS) and Labour Office permits. None of the sampled workers had any family members performing work.</p> <ul style="list-style-type: none"> • Employment contracts template, "Employment Contract Extension for Foreign Worker (Peninsular – Indonesia/ Nepalese) – ECE1 • Check-roll records, Estate/mill daily attendance report, CKRRD005 • Employee Master List, SEMUA report. 	
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, evidence was available that Bukit Puteri POM and estate were able to demonstrate compliance with Employment Contracts 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCSCO, EPF, EIS) and non-statutory deductions (e.g. union/NUPW, water, electricity bills, etc) in accordance with Labour Office permits. Sampled during the audit were the following workers' employment contracts and payslips for the month of November 2022 (peak), March 2023 (low) and July 2022 (average/medium). Sampling formula: square root of total workers x 0.8 = total workers sampled. Based on workers sampled (14 workers, Bukit Puteri Estate and 7 workers, Bukit Puteri POM), there were no issues of legal non-compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirement verified from the workers sampled.</p>	Complied

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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>Sime Darby Plantation Berhad has established Workers Housing Management Procedure and ‘OilPalmPal’ Digital Housing Complaint System (OPP DHCS) to effectively monitor and update house repair works. In addition to the said procedures, additional guidelines on repair completion timeline in workers housing management procedure ver. 1 dated 30/6/2022, ref: CEOUM/HSE/018/06/2022) is referred to. General house rule is written under "Peraturan Umum Kompleks Perumahan Pekerja". Linesite inspection (housing complex/nest/community hall weekly inspections (PIOA) carried out as per the following:</p> <table border="1" data-bbox="1137 699 1926 948"> <thead> <tr> <th>Estate/mill</th> <th>Date of inspection</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Bukit Puteri Estate</td> <td>27/3/23, 22/3/23, 15/3/23, 8/3/23, 1/3/23.</td> <td rowspan="2">No issue reported and evaluated as comply</td> </tr> <tr> <td>Bukit Puteri POM</td> <td>25/3/23, 18/3/23, 11/3/23, 4/3/23</td> </tr> </tbody> </table> <p>Quarterly housing inspection was carried out by EWC (Employee Welfare Committee) for each house unit at Division A and B. Minimum required frequency is quarterly and can be done as and when necessary. Summary of inspection report as per the following:</p> <table border="1" data-bbox="1137 1094 1926 1276"> <thead> <tr> <th>Estate/mill</th> <th>Date of inspection</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Bukit Puteri Estate</td> <td>29/3/2023, 26/2/2023, 30/1/23</td> <td rowspan="2">36 checklist items evaluated as comply. Score (A)</td> </tr> <tr> <td>Bukit Puteri POM</td> <td>18/3/22, 15/12/22</td> </tr> </tbody> </table> <p><i>Scoring:</i> A: 90 – 100 % (well managed)</p>	Estate/mill	Date of inspection	Remarks	Bukit Puteri Estate	27/3/23, 22/3/23, 15/3/23, 8/3/23, 1/3/23.	No issue reported and evaluated as comply	Bukit Puteri POM	25/3/23, 18/3/23, 11/3/23, 4/3/23	Estate/mill	Date of inspection	Remarks	Bukit Puteri Estate	29/3/2023, 26/2/2023, 30/1/23	36 checklist items evaluated as comply. Score (A)	Bukit Puteri POM	18/3/22, 15/12/22	<p>Complied</p>
Estate/mill	Date of inspection	Remarks																	
Bukit Puteri Estate	27/3/23, 22/3/23, 15/3/23, 8/3/23, 1/3/23.	No issue reported and evaluated as comply																	
Bukit Puteri POM	25/3/23, 18/3/23, 11/3/23, 4/3/23																		
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Bukit Puteri POM	18/3/22, 15/12/22																		

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		<p><i>B: 80 – 89 % (satisfactorily managed with minor exception)</i> <i>C: 50 – 79 % (moderately satisfactorily with major exception)</i> <i>D: 0 – 49 % (poorly managed, require close monitoring and visit)</i></p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There were sundry shops located in the estates compound. The workers can easily access to adequate, sufficient, and affordable foods and goods. Price of goods was displayed at the sundry shops. Interview with group of workers (gender committee, worker' representative and union representative) confirmed that they can easily purchase foods at the nearest shop or choose to go nearest town away from the estate by using their transport until the main guard post and public transport to the nearest town. Sundry shop price was monitored by estate on monthly/quarterly basis. Latest record of monitoring has shown no sudden price hike and control goods/item sell as per control price set.</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>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>SOU 10 conducted the Prevailing Wage Assessment and calculated individual local and foreign workers current salary including non-monetary benefit given average Bukit Puteri POM for local worker RM1,917.97; FW: RM2,441.37. DLW assessment conducted by Group Sustainability & Quality Manager (GSQM) Sime Darby Plantation.</p>	Complied

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	<p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors’ workers and contracted workers is used for all core work performed by the unit of</p>	<p>There are no casual workers hired at SOU 10. All employees hired are permanent employee (for locals and foreign workers) as well under contractor’s workers. All permanent and full-time employment</p>	Complied

	<p>certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>or contract workers used as the general worker, mandore, staff, etc. based on their employment contract sighted in clause 6.2.2. employment contracts detailing payments and conditions of employment available to the permanent workers employed as per samples sighted in indicator 6.2.2 above. No casual, temporary and day labour employed within all operating units within SOU 10.</p>	
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
<p>6.3.1</p>	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> • Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. • Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. • Company respects the rights of all personnel to form and join trade unions of their choice to bargain collectively. <p>During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union.</p>	<p>Complied</p>
<p>6.3.2</p>	<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>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>	<p>Complied</p>

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	<p>- Minor compliance -</p>	<table border="1"> <thead> <tr> <th data-bbox="1137 360 1391 411">Estate/mill</th> <th data-bbox="1391 360 1664 411">Date of meeting</th> <th data-bbox="1664 360 1928 411">Remarks</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 411 1391 459">Bukit Puteri Estate</td> <td data-bbox="1391 411 1664 459">31/3/23, 13/1/22</td> <td data-bbox="1664 411 1928 459">Annual meeting</td> </tr> <tr> <td data-bbox="1137 459 1391 544">Bukit Puteri POM</td> <td data-bbox="1391 459 1664 544">19/1/2023, 15/2/2022</td> <td data-bbox="1664 459 1928 544"></td> </tr> </tbody> </table>	Estate/mill	Date of meeting	Remarks	Bukit Puteri Estate	31/3/23, 13/1/22	Annual meeting	Bukit Puteri POM	19/1/2023, 15/2/2022		<p>Minutes of meetings available for verification at each visited operating units.</p>	
Estate/mill	Date of meeting	Remarks											
Bukit Puteri Estate	31/3/23, 13/1/22	Annual meeting											
Bukit Puteri POM	19/1/2023, 15/2/2022												
<p>6.3.3</p>	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Based on the worker’s interview, the selection of NUPW representative made from the election among the NUPW member without management interference. Foreign workers included in the committee formation and appointment letter sighted. The selection also based on the election meeting.</p>	<p>Complied</p>										
<p>Criterion 6.4: Children are not employed or exploited.</p>													
<p>6.4.1</p>	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> - Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. - Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. - Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations. - Enhancing Safety and Health: We provide a safe and healthy 	<p>Complied</p>										

		<p>working environment for our employees and workers in our operations and support the wellbeing of our communities.</p> <ul style="list-style-type: none"> - Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognise that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use. - Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees. - Protecting the Rights of Children: We seek to promote the wellbeing of children, and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography. <p>Verification of workers master list (direct employed and contract workers) confirmed that there is no child labour hired.</p> <p>For contractors, the clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC dated 21/06/2020, Human Rights Charter-protecting the rights of children.</p>	
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The screening procedure was included as per SOP Hiring of Local Workers procedure (Doc. No.: 01-12-19) dated 01/12/2019 and Migrant Worker Responsible Recruitment Procedure dated 20/08/2021 to explain the recruitment processes for both local and foreign workers. under clause procedures recruitment team shall be guided by approved requirement; (Age 18-45 years old). The recruitment of foreign workers will be carried out by recruitment agents in Malaysia and origin countries to assist in the recruitment drive and manage local processing of documents.</p>	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.	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, COBC briefing was given on 24/2/23 at Bukit Puteri 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 -	The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below: We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to: <ul style="list-style-type: none"> • Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims. • Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking, and sexual exploitation. • The policy was communicated during muster briefing on 21/3/2023. 	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Sime Darby Plantation Berhad has developed Human Rights Charter where they create a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict. The policy has been communicated to the workers through musters, trainings and display on notice boards.	Complied

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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>The assessment of needs for new mothers was conducted by Gender Committee in SOU10. There new mother needs sampled as per below:</p> <p>Bukit Puteri Estate (15/03/23): New mother requested for breast feeding time to be allocated.</p> <p>Bukit Puteri POM (2/1/2023): Request for breast feeding time from 1100-1200 am.</p> <p>Action taken by management: The request has been approved by the management team.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has revised Terms of Reference for Gender Representatives and Gender Committees dated March 2021. Sime Darby Plantation Berhad has implemented Grievances Response Standard Operating Procedure dated 18/07/2022. The complaints and grievances are open to effected parties including internal and external stakeholders. The time frame to deal with internal and external communications has been detailed in the Section 2.2. Flow chart procedure and 3.3 The time scale of investigation.</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.simedarby.com/operating-responsibly/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> <p>The workers in Bukit Puteri Estate were briefed on the complaint mechanism during morning muster on 29/3/2023. Besides, external</p>	Complied

		<p>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>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>The recruitment cost was declared by the labour agent from source country for the applicable fees. Sampled for PT Cipta Rezeki Utama & PT Cahaya Lombok for Indonesia effective date on 13/7/2022 and valid for 2 years (13/7/22 – 12/7/24) documents required, medical, insurance, transportation, etc. No other hidden recruitment fees paid to agent. Under contract terms and condition, clause 3.3 no charging of recruitment fees has been clearly defined as listed below:</p> <ul style="list-style-type: none"> - Levy - VISA (multiple entry/visas with reference), VISA processing fees, VISA pass (PLKS) - Assurance bond - Attestation fees - Agency service charge (MRA)/Agency fees - Medical Examination (FOMEMA) - Foreign Workers Management System (BESTINET/online medical) - Processing fees, VISA fees - Immigration security clearance - One Stop Centre - PPN 10% (Indonesian tax) - Air ticket - Medical examination (source country) 	<p>Complied</p>

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		<ul style="list-style-type: none"> - Transportation, food, and accommodation – during process following selection - Transportation, food, and accommodation – to point of departure/airport - Pre-departure training (source country) - Passport & other ID <p>All the above fees will be paid by Sime Darby Plantation Berhad. Passport was kept by workers themselves and locker has been provided at their house for safe keeping.</p> <p>There is no contract substitution as the employment contract signed between Sime Darby and embassy of Indonesia and India was same with the employment contract signed between worker and estate/mill.</p> <p>Based on the workers interview, the overtime was given voluntarily if any work offered. The termination of service clearly stated that the termination of employment if:</p> <ol style="list-style-type: none"> 1. The company is not satisfied with your performance 2. You end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term. 3. You commit any misconduct, including theft, fraud, insubordination, negligence, or any other form of crime. 4. You have breached any express or implied terms of your employment. 5. Fail medical examination based on FOMEMA result. 	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has implemented a Sime Darby's Human Rights Charter revised 2020 and can be easily access via www.simedarbyplantation.com where they committed as below:</p>	Complied

		<ul style="list-style-type: none"> a. Providing equal opportunity b. Respecting freedom of association c. Eradicating any form of exploitation d. 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 e. 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>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
<p>6.7.1</p>	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>All operating units have formed an OSH Committee in the respective mill and estate to address all issues associated to Health and Safety in the operating units.</p> <ul style="list-style-type: none"> a. <u>Bukit Puteri Palm Oil Mill</u> The Mill Manager, Mr. Sahuri Bin Saari has been appointed as the Chairman of the OSH committee in the mill as stated in the appointment letter dated 01/11/2022 undersigned by the Regional CEO - Central East Region. b. <u>Bukit Puteri Estate</u> 	<p>Complied</p>

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		<p>The Estate Manager, Mr. Rajan a/l Rajaratnam has been appointed as the Chairman of the OSH Committee in the state as stated in the appointment letter dated 01/10/2022 undersigned by the Regional CEO, Central East Region.</p> <p>OSH Committee of the respective operating units conducts regular OSH Meetings to address all issues related to OSH in the operating units.</p> <p>a. Bukit Puteri Palm Oil Mill have conducted regular OSH Meetings in the mill. The meeting minutes were available for verification dated 07/03/2023 (1st – 2023), 08/12/2022 (4th – 2022), 14/09/2022 (3rd - 2022) and 01/06/2022 (2nd – 2022).</p> <p>b. Bukit Puteri Estate conducted regular OSH Meetings in the estate. The meeting minutes were available for verification dated 20/03/2023 (01-2023), 22/12/2022 (04-2022), 13/09/2022 (03-2022) and 16/06/2022 (02-2022).</p>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Emergency Response Plans and Procedures were available in the estates and mills to address potential emergencies such as Flood, Fire, Chemical Spillage, Poisoning, Earthquake/landslide, Accidents, Storm, and Wild/ Poisonous Animal Attacks. The plans have been posted at notice boards in the mills and estates and communicated to the workers. Emergency contact numbers have been posted at the notice boards and provided to the workers as well. Interview with the workers such as mandores and store attendants indicated that the workers are aware on the available emergency response plans. Trainings were conducted in the mill and estates to provide awareness to the workers on emergency responses. The trainings were sighted as below.</p> <p>1. <u>Bukit Puteri Palm Oil Mill</u></p> <p>- Fire Fighting Equipment Training – 05/10/2022</p>	Complied

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		<ul style="list-style-type: none"> - Fire Drill Training – 19/08/2022 <p>2. <u>Bukit Puteri Estate</u></p> <ul style="list-style-type: none"> - Fire Emergency Response Team (ERT) competency training 2023 – 19/03/2023. - Fire Drill conducted by BOMBA on 01/02/2023, <p>First aiders were present in the operating units. They have been trained and obtained certificates as the PIC to address first aid in the operating units. Visit to the mill and estates indicated each station and gangs were equipped with first aid kits. Interview with the respective first aid holders indicated that they were well aware on the methods to use the items in the first aid boxes. The boxes are regularly monitored by the mill and estate Hospital Assistants to replenish the used items and replace expired items. Records of items used were also maintained and available in the boxes.</p> <p>1. <u>Bukit Puteri Palm Oil Mill</u></p> <p>The First Aid Training was conducted on 22/03/2023.</p> <p>2. <u>Bukit Puteri Estate</u></p> <p>The estate has provided first aid boxes for all operation heads. All first aid holders were trained by the MA with the recent training conducted on 23/09/2022. Interview with the first aid box holder at the Spraying Gang, Harvesting and Chemical Stores indicated that they are all aware of the usage of the items in the first aid boxes.</p> <p>Accident records were maintained in the estate and available for verification.</p> <p>1. <u>Bukit Puteri POM</u></p> <p>For the year 2022 there were 11 accidents reported. The JKKP 8 form have been submitted to DOSH on 13/01/2023 and available</p>	
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		<p>for verification. For the year 2023 there were no accidents reported.</p> <p>2. <u>Bukit Puteri Estate</u></p> <p>For the year 2022 there were 3 accidents reported for the year with 6 losses of mandays. The JKKP 8 form have been submitted to DOSH on 13/01/2023 and available for verification. For the year 2023 there were no accident or near misses reported in the estate. Records of investigation and reporting were available for verification.</p>	
6.7.3	<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 mill and estates visited provided appropriate PPE to all workers according to the job type. The PPE given as per HIRARC and Personal Protective Equipment (PPE) Procedure, UM/HSE/OCP/03 dated 09/03/2021.</p> <p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition.</p> <p>Nevertheless, Appropriate PPE and Sanitation Facility was not used.</p> <ol style="list-style-type: none"> 1. During the site visit to the spraying operation at Bukit Puteri Estate, it was verified that the sprayers did not wear appropriate PPE (Safety Goggles) while in operation. This was not in accordance with the HIRARC – Spraying dated 15/01/2022 of Bukit Puteri Estate. 2. Interview with the sprayers indicated that they do not sanitise themselves prior to returning home from spraying activities. They 	Non-compliance

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		<p>acknowledged that they only use the facility to wash the PPEs and return home to sanitise themselves. Thus, Major NC was raised.</p>																									
<p>6.7.4</p>	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law. - Minor compliance -</p>	<p>All workers are provided with medical care which is borne by the operating units management. Each operating unit has its own dispensary managed by a certified Hospital Assistant. There are no restrictions for workers to obtain medical aid from the dispensary. In case of major injuries or health issues, workers are referred to private clinics or hospitals which is totally borne by the management as well. All workers are protected via insurance in accordance with Malaysian Law via SOCSO contribution. The monthly contribution was evident via the PERKESO Monthly Salary Contribution (Form 8A) for the workers as following.</p> <table border="1" data-bbox="1137 823 1926 1206"> <thead> <tr> <th>Operating Units</th> <th>Month</th> <th>Total Workers</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Bukit Puteri POM</td> <td>Dec 2022</td> <td>84</td> <td>RM 5,XXX.XX</td> </tr> <tr> <td>Jan 2022</td> <td>81</td> <td>RM 4,XXX.XX</td> </tr> <tr> <td>Feb 2023</td> <td>81</td> <td>RM 3,XXX.XX</td> </tr> <tr> <td rowspan="3">Bukit Puteri Estate</td> <td>Dec 2022</td> <td>251</td> <td>RM 12,XXX.XX</td> </tr> <tr> <td>Jan 2022</td> <td>292</td> <td>RM 9,XXX.XX</td> </tr> <tr> <td>Feb 2023</td> <td>286</td> <td>RM 9,XXX.XX</td> </tr> </tbody> </table>	Operating Units	Month	Total Workers	Amount	Bukit Puteri POM	Dec 2022	84	RM 5,XXX.XX	Jan 2022	81	RM 4,XXX.XX	Feb 2023	81	RM 3,XXX.XX	Bukit Puteri Estate	Dec 2022	251	RM 12,XXX.XX	Jan 2022	292	RM 9,XXX.XX	Feb 2023	286	RM 9,XXX.XX	<p>Complied</p>
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6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	All accidents incidents are reviewed during the quarterly held safety meetings in the operating units. Records on Lost Time Accident (LTA) are maintained and presented during the meetings. Accident records were updated and available for verification. JKPP 8 have been submitted to DOSH accordingly and available for verification. The LTA for each operating unit has been recorded (year to date March 2023) and available as below.	Complied																			
		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Operating Units</th> <th colspan="2">2022</th> <th colspan="2">2023</th> </tr> <tr> <th>Cases</th> <th>Days</th> <th>Cases</th> <th>Days</th> </tr> </thead> <tbody> <tr> <td>Bukit Puteri POM</td> <td style="text-align: center;">6</td> <td style="text-align: center;">26</td> <td style="text-align: center;">0</td> <td style="text-align: center;">0</td> </tr> <tr> <td>Bukit Puteri Estate</td> <td style="text-align: center;">3</td> <td style="text-align: center;">6</td> <td style="text-align: center;">0</td> <td style="text-align: center;">0</td> </tr> </tbody> </table>	Operating Units	2022		2023		Cases	Days	Cases	Days	Bukit Puteri POM	6	26	0	0	Bukit Puteri Estate	3	6	0	0	
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Bukit Puteri Estate	3	6	0	0																		

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. - Critical (Major) compliance -</p>	<p>Integrated Pest Management Plan has been established for the year of 2023. The plan was monitored by person in charge with target date and completion status. Among the plan as below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Issue / Area</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>Bagworm attack</td> <td>To increase plan beneficial plan ratio per Ha 1dm:1Ha to 2dm:1ha</td> </tr> <tr> <td>Rat attack</td> <td>To increase ratio BOB from 1:30 and gradually to 1:10 ratio</td> </tr> <tr> <td>Soil Moisture</td> <td>To Plan Nephrolepis to emergence of weed and to increase moisture</td> </tr> <tr> <td>Chipping of trunk</td> <td>To chipping trunk below 10cm in order to avoid breeding of rhino beetle</td> </tr> </tbody> </table>	Issue / Area	Action Plan	Bagworm attack	To increase plan beneficial plan ratio per Ha 1dm:1Ha to 2dm:1ha	Rat attack	To increase ratio BOB from 1:30 and gradually to 1:10 ratio	Soil Moisture	To Plan Nephrolepis to emergence of weed and to increase moisture	Chipping of trunk	To chipping trunk below 10cm in order to avoid breeding of rhino beetle	Complied
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		<table border="1"> <tr> <td>LCC</td> <td>To prevent breeding of RB</td> </tr> <tr> <td>Single layer of EFB Mulching</td> <td>To prevent breeding of RB</td> </tr> </table>	LCC	To prevent breeding of RB	Single layer of EFB Mulching	To prevent breeding of RB	
LCC	To prevent breeding of RB						
Single layer of EFB Mulching	To prevent breeding of RB						
		Monitoring has been conducted by estate. The estate continues to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. Barn owls Tyto Alba has been used for biological control of rats. Census records show that there was minimal outbreak of leaf eating pest. Although there have been minimal outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators and further reduce the outbreak. The estates have planted beneficial plants such as Cassia cobanensis and Turnera subulata and Antigonon leptopus.					
7.1.2	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. - Minor compliance -	Species referenced in the Global Invasive Species Database and CABI.org are not used in the estate.	Complied				
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	There was no evidence of use of fire for pest control in all the estate.	Complied				
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.							
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	The written justification in Standard Operating Procedure (SOP) of all agrochemicals are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Berhad. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 01/07/2011. As per section 1.7.2 Table 5, the manual already classified the type of weed, herbicide to used, rate/dosage and dilution rate as a guidance based on the field	Complied				

		conditions. Addition or reduction of rounds and dosage will be considered in consultation with the respective head of units or agronomist.													
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate. Sighted the sampled records of pesticides usage (A.I.) per ha at estates visited FY 2023 (to date) as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Quantity (a.i./Ha)</th> <th>Quantity (a.i/FFB)</th> </tr> </thead> <tbody> <tr> <td>Jan 2023</td> <td>0.460</td> <td>0.061</td> </tr> <tr> <td>Feb 2023</td> <td>0.093</td> <td>0.138</td> </tr> <tr> <td>Mar 2023</td> <td>0.130</td> <td>0.196</td> </tr> </tbody> </table>	Month	Quantity (a.i./Ha)	Quantity (a.i/FFB)	Jan 2023	0.460	0.061	Feb 2023	0.093	0.138	Mar 2023	0.130	0.196	Complied
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Jan 2023	0.460	0.061													
Feb 2023	0.093	0.138													
Mar 2023	0.130	0.196													
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 quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5. The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan. Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas. Paraquat was eliminated. In replace, alternatives such as Glyphosate is used instead.</p>	Complied												
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There is no prophylactic use of pesticides in all estates visited.</p>	Complied												

<p>7.2.5</p>	<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> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>The Chemical Registers for the mill and sampled estates were available for verification and reviewed yearly and as and when there are introductions of new chemicals in the operations.</p> <p>The register showed that only class III & IV pesticides were used at the mill and estates. Paraquat and Monocrotophos was eliminated. In its place, less hazardous alternatives such as Glyphosate and Acephate was used instead.</p>	<p>Complied</p>						
<p>7.2.6</p>	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>The pesticides operators have been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly health surveillance done by the Medical Assistant. Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators based on the PPE issuance forms. Reviewed the training records as per criteria 3.7.2. Sampled the training conducted for pesticide handlers as below: -</p> <p><u>Bukit Puteri Estate</u></p> <table border="1" data-bbox="1137 1235 1912 1394"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Sprayers – Refresher Training</td> <td>16/02/2023</td> </tr> <tr> <td>Chemical and Spraying Training</td> <td>05/01/2023</td> </tr> </tbody> </table>	Training	Date	Sprayers – Refresher Training	16/02/2023	Chemical and Spraying Training	05/01/2023	<p>Complied</p>
Training	Date								
Sprayers – Refresher Training	16/02/2023								
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7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices. - Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the storekeeper was seen to unlock the 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
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -</p>	<p>All pesticide containers have been tripled rinsed and punctured before disposed to contractors. Refer latest disposal record dated 23/12/2022 with Consignment note number: 2247 by SS Setia Teknologi Enterprise. Sample of items disposed as below: i) Rags = 1200 kg ii) 20L chemical containers = 320 pcs iii) Ally bottle = 23.75 kg</p>	Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -</p>	<p>No aerial spray activities conducted in SOU 10.</p>	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -</p>	<p>The CHRA of each operating units have recommended the necessity of annual medical surveillance for pesticide applicators exposed to pesticides that are classified as organophosphates. Results of annual medical surveillance were available in the estate for verification as follows.</p>	Complied

		The medical surveillance programme for the year 2022 has been performed on 17/03/2022 at Klinik Chung for 50 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work.	
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has established Gender Policy on Motherhood Responsibilities and Reproductive Rights on prohibition of all confirmed pregnant and breast-feeding woman to work with pesticides. The policy has been communicated to the workers through induction training for new workers, morning briefing, iCARE Safety and Health Townhall meeting, and displayed at various notice board within the estate.</p> <p>The estates visited prohibited all confirmed pregnant and breast-feeding woman to work with pesticides as per internal memo signed by the Assistant Manager. The memo has been displayed on the notice board at few strategic places in the estate.</p>	Complied
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>Addressed in the Waste Management Procedure for Estates & Mill dated May 2022 with reference number SD/SDH/GSD/HSE/0522/01. Waste management were based on their categorization which is:</p> <ul style="list-style-type: none"> • Scheduled Waste • Hazardous waste • Non-Hazardous waste • Industrial waste • Construction waste • Agricultural waste • Office waste • General waste 	Complied

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		<p>Bukit Puteri Estate and POM has established Waste Management Plan 2023. Among details in the management plan tabulated in the table below:</p> <table border="1"> <thead> <tr> <th data-bbox="1137 467 1352 549">Waste Generation</th> <th data-bbox="1352 467 1937 549">Action Plan</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 549 1352 751">Scheduled waste</td> <td data-bbox="1352 549 1937 751"> <ol style="list-style-type: none"> 1. Comply with Schedule waste regulation 2. Update inventory of SW in E-Swiss on monthly basis 3. Ensure storage of SW not exceed 180 days 4. Ensure each SW have labels </td> </tr> <tr> <td data-bbox="1137 751 1352 938">Industrial waste</td> <td data-bbox="1352 751 1937 938"> <ol style="list-style-type: none"> 1. Liaise with Procurement Department for tendering process to appoint vendor to collect scrap metals 2. Ensure the contractor to dispose the debris after work completion </td> </tr> <tr> <td data-bbox="1137 938 1352 1238">Domestic waste</td> <td data-bbox="1352 938 1937 1238"> <ol style="list-style-type: none"> 1. Identify landfill at least 500m distances from nearest waterways, river 2. Allocate sufficient amount of dustbin at office and housing compound 3. Collect waste at estate compound at least 3 times a week 4. Arrange licenced contractors to de sludge septic tank periodically </td> </tr> <tr> <td data-bbox="1137 1238 1352 1393">Operational waste</td> <td data-bbox="1352 1238 1937 1393"> <ol style="list-style-type: none"> 1. Fertilizer bag re used for loose fruit collection or return to supplier 2. Old tyres used for landscaping or return to supplier </td> </tr> </tbody> </table>	Waste Generation	Action Plan	Scheduled waste	<ol style="list-style-type: none"> 1. Comply with Schedule waste regulation 2. Update inventory of SW in E-Swiss on monthly basis 3. Ensure storage of SW not exceed 180 days 4. Ensure each SW have labels 	Industrial waste	<ol style="list-style-type: none"> 1. Liaise with Procurement Department for tendering process to appoint vendor to collect scrap metals 2. Ensure the contractor to dispose the debris after work completion 	Domestic waste	<ol style="list-style-type: none"> 1. Identify landfill at least 500m distances from nearest waterways, river 2. Allocate sufficient amount of dustbin at office and housing compound 3. Collect waste at estate compound at least 3 times a week 4. Arrange licenced contractors to de sludge septic tank periodically 	Operational waste	<ol style="list-style-type: none"> 1. Fertilizer bag re used for loose fruit collection or return to supplier 2. Old tyres used for landscaping or return to supplier 	
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		<p>The implementation was monitored by the management units on monthly basis.</p> <p>There are two contractors was appointed to handle the disposal of schedule waste. Contractors' information as below:</p> <ul style="list-style-type: none"> i) Kualiti Alam Sdn Bhd #004XXX valid until 30/04/2023 ii) CENVIRO Recycling and Recovery Sdn Bhd #003XXX valid until 30/04/2023 	
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 of Schedule waste management has been established. Refer Waste Management Procedure for Estates & Mill dated May 2022 with reference number SD/SDH/GSD/HSE/0522/01. Other reference made was Guidelines for Packaging, Labelling and Storage of Scheduled Wastes In Malaysia.</p> <p>Awareness training on Schedule waste has been conducted as per date below:</p> <ul style="list-style-type: none"> • Bukit Puteri Estate: 20/03/2023 • Bukit Puteri POM: 12/01/2023 <p>Generally, the workers have demonstrated good understanding in proper disposal of wastes.</p> <p>Record of Inventory of Schedule Waste and Disposal Record as per details below:</p> <p><u>Bukit Puteri Estate</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> • File reference Number: AS:CH11/123/XXX/XXX • Date Reporting: 03/04/2023 • Waste Generated: SW305, SW404, SW409, SW410. <p><u>Disposal</u></p> <p>Sample 1</p>	Complied

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		<ul style="list-style-type: none"> • Disposal consignment note: 2022111417FS57DH • Date Disposal: 14/11/2022 • SW 404 – Clinical waste, 0.0026 MT disposed by Kualiti Alam Sdn Bhd <p>Sample 2</p> <ul style="list-style-type: none"> • Disposal consignment note: 2023020412F8Q5CP • Date Disposal: 04/02/2023 • SW 305 – Spent Lubricating Oil, 0.1300 MT disposed by Kualiti Alam Sdn Bhd <p><u>Bukit Puteri POM</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> • File reference Number: JAS.CCH.600-3/1/32 • Date Reporting: 29/03/2023 • Waste Generated: SW305, SW306, SW322, SW409, SW410. <p><u>Disposal</u></p> <p>Sample 1</p> <ul style="list-style-type: none"> • Disposal consignment note: 20221223171ZI7JD • Date Disposal: 23/12/2022 • SW 322 – Spent Hexane, 0.2024 MT disposed by Kualiti Alam Sdn Bhd <p>Sample 2</p> <ul style="list-style-type: none"> • Disposal consignment note: 20221223171ZI7JD • Date Disposal: 23/12/2022 • SW 322 – Spent Hexane, 0.2024 MT disposed by Kualiti Alam Sdn Bhd 	
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7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	<p>There was no evidence of fire used for waste disposal estate visited. Domestic waste was collected and disposed at landfill.</p> <table border="1" data-bbox="1137 443 1926 544"> <thead> <tr> <th data-bbox="1137 443 1456 491">Estate</th> <th data-bbox="1462 443 1693 491">Block No</th> <th data-bbox="1700 443 1926 491">Date Open</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 491 1456 544">Bukit Puteri Estate</td> <td data-bbox="1462 491 1693 544">P2015C</td> <td data-bbox="1700 491 1926 544">03/04/2023</td> </tr> </tbody> </table>	Estate	Block No	Date Open	Bukit Puteri Estate	P2015C	03/04/2023	Complied
Estate	Block No	Date Open							
Bukit Puteri Estate	P2015C	03/04/2023							
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.									
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	<p>SOP on managing soil fertility for optimize yield and minimize environmental impacts has been established. The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents.</p> <ul style="list-style-type: none"> • EQMS chapter B8 - Leguminous Cover Crops • EQMS chapter B14 – Manuring • ARM Section 8 – Manuring 	Complied						
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	<p>Foliar and soil sampling was carried out by the Research and Development Department prior to the fertilizer recommendation for the next financial year. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling must be conducted for every year while for soil analysis, the frequency for soil sampling is conducted at 5 years intervals.</p> <p>Reviewed the sampling records as follows: <u>Bukit Puteri Estate</u> Latest Soil Sampling was conducted on 25/01/2023. Refer report no. P88/2023 dated 20/03/2023. Latest leaf sampling was conducted in 07/02/2023. Refer report P69/2023 dated 08/03/2023.</p>	Complied						

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<p>7.4.3</p>	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>The mill disposed EFB by send to neighbouring sister estate as nutrient recycle program. Reviewed the EFB disposal records FY 2022 as follows:</p> <p>The following practices are applied in the estates in relation to the nutrient recycling strategy.</p> <ol style="list-style-type: none"> 1. EFB application in designated fields at dosage of 40 mt/ha applied in inter rows subject to Agronomist recommendations. 2. The cut frond are stacked in between the palm's rows left to discompose. <p>The estate has established EFB and Bio-Compost application program FY 2022. Reviewed the application records FY 2022 as sample below:</p> <p><u>Bukit Puteri Estate</u></p> <table border="1" data-bbox="1137 805 1933 1005"> <thead> <tr> <th>Month</th> <th>Field</th> <th>EFB Applied, MT</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>Jan 2022</td> <td>2014C</td> <td>977.72</td> <td>Completed</td> </tr> <tr> <td>Mar 2022</td> <td>2017C</td> <td>977.45</td> <td>Completed</td> </tr> <tr> <td>Aug 2022</td> <td>2017C</td> <td>1,380.19</td> <td>Completed</td> </tr> </tbody> </table> <p>Bukit Puteri POM discharge POME through river after treated as per "Jadual Pematuhan" No:004160. Signage on "Takat Pelepasan" was maintained at Mill has conducted water sampling at final discharge. Refer Report from Sime Darby Plantation Research Sdn Bhd dated 23/03/2023 with reference number EP170/2023.</p> <p>Latest water analysis report for "Hulu" and "Hilir" River conducted on 08/12/2022 with report reference IE14/2023 dated 03/01/2023.</p> <p>EFB management was according to letter by DOE dated 25/04/2022 with reference number JAS.600-3/1/4(16). Monthly inventory of EFB has been submitted latest on 07/03/2023.</p>	Month	Field	EFB Applied, MT	Status	Jan 2022	2014C	977.72	Completed	Mar 2022	2017C	977.45	Completed	Aug 2022	2017C	1,380.19	Completed	<p>Complied</p>
Month	Field	EFB Applied, MT	Status																
Jan 2022	2014C	977.72	Completed																
Mar 2022	2017C	977.45	Completed																
Aug 2022	2017C	1,380.19	Completed																

7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>The fertiliser application was conducted as per recommendation by agronomist base on foliar sampling conducted. The fertiliser application records were available at the estate visited for review. The estate reported the fertilised application to the Research and Development Carey Island. Refer 2022 Fertiliser Programme and Application Record. Sample of fertilizer programme and application record as table below:</p> <table border="1" data-bbox="1137 603 1926 935"> <thead> <tr> <th>Field</th> <th>Fertilizer</th> <th>Amount, MT</th> <th>Program</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>Mature</td> <td>NKC1</td> <td>833.00</td> <td>Feb-Mac</td> <td>Completed</td> </tr> <tr> <td>Mature</td> <td>RP</td> <td>676.45</td> <td>May</td> <td>Completed</td> </tr> <tr> <td>Mature</td> <td>Kieserite</td> <td>258.55</td> <td>June</td> <td>Completed</td> </tr> <tr> <td>Immature</td> <td>CCM45</td> <td>17.35</td> <td>Feb</td> <td>Completed</td> </tr> <tr> <td>Immature</td> <td>Borate</td> <td>1.15</td> <td>Aug</td> <td>Completed</td> </tr> </tbody> </table>	Field	Fertilizer	Amount, MT	Program	Status	Mature	NKC1	833.00	Feb-Mac	Completed	Mature	RP	676.45	May	Completed	Mature	Kieserite	258.55	June	Completed	Immature	CCM45	17.35	Feb	Completed	Immature	Borate	1.15	Aug	Completed	Complied
Field	Fertilizer	Amount, MT	Program	Status																													
Mature	NKC1	833.00	Feb-Mac	Completed																													
Mature	RP	676.45	May	Completed																													
Mature	Kieserite	258.55	June	Completed																													
Immature	CCM45	17.35	Feb	Completed																													
Immature	Borate	1.15	Aug	Completed																													
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>Soil maps and soil topography maps were available at estate that identifying the type of soil series and its area percentage in the estate. There were no marginal and fragile soils identified at the assessed estate. During field visit at the estates, it was sighted there was no oil palm planting on steep terrains as well.</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>Addressed in the Sime Darby Plantation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.1 Protect and conserve biodiversity and ecosystems stated as follows:</p>	Complied																														

		"3.1.2 - Management of erosion by protection of steep slopes and river reserves within our operations and promote restoration programs."																					
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	Verified through document checking, interview and site verification found there is no new planting or replanting activities on steep terrain.	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	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Sighted Soil series and topography map at sampled estates. No fragile soil categorized in the estates sampled. The estate has taken into account the land terrain, drainage, and road systems in planning for replanting. Refer table below on details of soil series for estates: <table border="1" data-bbox="1137 810 1921 1308"> <thead> <tr> <th>Soil series</th> <th>Bukit Puteri Estate, Percentage %</th> </tr> </thead> <tbody> <tr> <td>Chat</td> <td>77.51</td> </tr> <tr> <td>Bungor</td> <td>8.18</td> </tr> <tr> <td>Tebok</td> <td>4.64</td> </tr> <tr> <td>Gajah Mati</td> <td>2.65</td> </tr> <tr> <td>Gong Chenak</td> <td>2.63</td> </tr> <tr> <td>Kuala Brang</td> <td>1.81</td> </tr> <tr> <td>Kerayong</td> <td>1.03</td> </tr> <tr> <td>Gol</td> <td>0.84</td> </tr> <tr> <td>Kuah</td> <td>0.73</td> </tr> </tbody> </table>	Soil series	Bukit Puteri Estate, Percentage %	Chat	77.51	Bungor	8.18	Tebok	4.64	Gajah Mati	2.65	Gong Chenak	2.63	Kuala Brang	1.81	Kerayong	1.03	Gol	0.84	Kuah	0.73	Complied
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7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Soil series and topography map available for estate sampled. No fragile soil categorized in the estates sampled. The estate has taken into account the land terrain, drainage, and road systems in planning for replanting.	Complied														
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	<p>The Agronomy Advisory and Services Department conducted assessment and provided the estates with topography maps. Sampled topography information at estate sighted as follows:</p> <table border="1" data-bbox="1137 632 1921 979"> <thead> <tr> <th>Degree</th> <th>Bukit Puteri Estate, Percentage, %</th> </tr> </thead> <tbody> <tr> <td>0°-2° - Flat</td> <td>9.07</td> </tr> <tr> <td>2°-6° - Undulating</td> <td>29.68</td> </tr> <tr> <td>6°-12° - Terraces</td> <td>35.81</td> </tr> <tr> <td>12°-20° - Hilly</td> <td>22.50</td> </tr> <tr> <td>20°-25° - Hilly</td> <td>2.51</td> </tr> <tr> <td>>25° - Steep</td> <td>0.43</td> </tr> </tbody> </table>	Degree	Bukit Puteri Estate, Percentage, %	0°-2° - Flat	9.07	2°-6° - Undulating	29.68	6°-12° - Terraces	35.81	12°-20° - Hilly	22.50	20°-25° - Hilly	2.51	>25° - Steep	0.43	Complied
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Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.																	
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	There is no new planting at sample estates. There is no peat soil identified at estate visited in SOU 10. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, the criterion is not applicable.	Not Applicable														
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE:	There is no new planting at sample estates. There is no peat soil identified at estate visited in SOU 10. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, the criterion is not applicable.	Not Applicable														

	<p>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).</p> <p>- Minor compliance -</p>		
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting at sample estates. There is no peat soil identified at estate visited in SOU 10. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, the criterion is not applicable.</p>	<p>Not Applicable</p>
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting at sample estates. There is no peat soil identified at estate visited in SOU 10. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, the criterion is not applicable.</p>	<p>Not Applicable</p>
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>There is no new planting at sample estates. There is no peat soil identified at estate visited in SOU 10. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, the criterion is not applicable.</p>	<p>Not Applicable</p>

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7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has established SOP on Agricultural Reference Manual dated 01/07/2008 Section 10.4.1 titled Water Management in Coastal or Peat Planting. There is no new planting at sample estates. There is no peat soil identified at all estates visited in SOU 10. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, the criterion is not applicable.</p>	Not Applicable								
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting at sample estates. There is no peat soil identified at estate visited in SOU 10. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, the criterion is not applicable.</p>	Not Applicable								
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>Bukit Puteri Estate and Bukit Puteri POM has established water management plan for the year 2023.</p> <table border="1" data-bbox="1137 1018 1926 1347"> <thead> <tr> <th data-bbox="1137 1018 1532 1070">Objective</th> <th data-bbox="1538 1018 1926 1070">Action Plan</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 1075 1532 1187">To monitor quality of main water inlet/outlet for pollutants from estate operations</td> <td data-bbox="1538 1075 1926 1187">Water analysis results by R&D</td> </tr> <tr> <td data-bbox="1137 1192 1532 1267">Contingency during water shortage</td> <td data-bbox="1538 1192 1926 1267">Purchasing water from JBA</td> </tr> <tr> <td data-bbox="1137 1272 1532 1347">Contingency during water shortage</td> <td data-bbox="1538 1272 1926 1347">Establish drain blocking system in field to conserve water</td> </tr> </tbody> </table>	Objective	Action Plan	To monitor quality of main water inlet/outlet for pollutants from estate operations	Water analysis results by R&D	Contingency during water shortage	Purchasing water from JBA	Contingency during water shortage	Establish drain blocking system in field to conserve water	Complied
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Contingency during water shortage	Establish drain blocking system in field to conserve water										

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		To monitor the usage of fresh water in monthly basis	Awareness to workers on water consumption													
		To monitor the plumbing system	To carry out immediately repair of broken pipelines and identified any													
		Harvesting rainwater	To use for general cleaning, operation, gardening and etc.													
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>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. Riparian buffer zones have been identified and demarcated. Signage has been placed. No chemicals and fertilizer application observed been used in their maintenance. In some areas Guatemala grass were planted along the riverbanks. Management of riparian zone is guided by River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). The widths of the buffer zones are guided by the following measurements:</p> <table border="1" data-bbox="1137 951 1906 1315"> <thead> <tr> <th>River width (meter)</th> <th>Minimum width for river reserve (m) for peninsular Malaysia and Sarawak</th> </tr> </thead> <tbody> <tr> <td>1-5</td> <td>5</td> </tr> <tr> <td>5-10</td> <td>10</td> </tr> <tr> <td>10-20</td> <td>20</td> </tr> <tr> <td>20-40</td> <td>40</td> </tr> <tr> <td>>40</td> <td>50</td> </tr> </tbody> </table> <p>There is a river at Bukit Puteri Estate named Sungai Telang. Verified availability of signage and buffer zone marking. There were no</p>		River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak	1-5	5	5-10	10	10-20	20	20-40	40	>40	50	Complied
River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak															
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10-20	20															
20-40	40															
>40	50															

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		<p>chemical activities sighted. Water analysis has been conducted. Refer Water Analysis report for Sungai Telang conducted on 28/12/2022 with reference IE67/2023 dated 13/01/2023. The results were in compliance to Class IIA/IIB of National Water Quality Standards for Malaysia.</p> <p>Bukit Puteri Estate has been protecting the water courses including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014).</p>																					
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly reports were submitted to DOE accordingly. Reviewed the Quarterly Return Form to DOE as follows:</p> <table border="1" data-bbox="1137 976 1919 1374"> <thead> <tr> <th>Report Date</th> <th>Quarter/Week</th> <th>BOD (Limit=100mg/L)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">10/01/2023</td> <td>1stweek/1stmonth</td> <td>56.00</td> </tr> <tr> <td>5thweek/2ndMonth</td> <td>32.00</td> </tr> <tr> <td>9thweek/3rdMonth</td> <td>50.00</td> </tr> <tr> <td rowspan="3">07/10/2022</td> <td>1stweek/1stmonth</td> <td>64.00</td> </tr> <tr> <td>5thweek/2ndMonth</td> <td>55.00</td> </tr> <tr> <td>9thweek/3rdMonth</td> <td>63.00</td> </tr> <tr> <td>08/07/2022</td> <td>1stweek/1stmonth</td> <td>63.00</td> </tr> </tbody> </table>	Report Date	Quarter/Week	BOD (Limit=100mg/L)	10/01/2023	1 st week/1 st month	56.00	5 th week/2 nd Month	32.00	9 th week/3 rd Month	50.00	07/10/2022	1 st week/1 st month	64.00	5 th week/2 nd Month	55.00	9 th week/3 rd Month	63.00	08/07/2022	1 st week/1 st month	63.00	Complied
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		<table border="1"> <tr> <td>5thweek/2ndMonth</td> <td>43.00</td> </tr> <tr> <td>9thweek/3rdMonth</td> <td>39.00</td> </tr> </table> <p>Bukit Puteri POM discharge POME through river after treated as per "Jadual Pematuhan" No:004160. Signage on "Takat Pelepasan" was maintained at Mill has conducted water sampling at final discharge. Refer Report from Sime Darby Plantation Research Sdn Bhd dated 23/03/2023 with reference number EP170/2023.</p>	5 th week/2 nd Month	43.00	9 th week/3 rd Month	39.00					
5 th week/2 nd Month	43.00										
9 th week/3 rd Month	39.00										
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>Mill has maintained monitoring of water usage for processing FFB which are recorded monthly. Water for processing is abstracted from water catchment by using pump. The trend of water usage is tandem with volume of FFB process. Refer Water Usage Record Bukit Puteri POM. Average data as below:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>FFB Processed, MT</th> <th>Water/L</th> <th>Water/FFB</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>60.221.51</td> <td>114,303.00</td> <td>1.89</td> </tr> </tbody> </table>	Year	FFB Processed, MT	Water/L	Water/FFB	2022	60.221.51	114,303.00	1.89	Complied
Year	FFB Processed, MT	Water/L	Water/FFB								
2022	60.221.51	114,303.00	1.89								
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>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Management Plan 2023. The document was reviewed/updated on January 2023. Among the Energy Management Plan were:</p> <ul style="list-style-type: none"> i) Worker's housing inspection to ensure no illegal wiring ii) Preventive maintenance programme for estate vehicles iii) Training / Educate workers on fuel saving practices iv) Regular maintenance of transport @ machine as per recommendation 	Complied								

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		<p>There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p> <table border="1" data-bbox="1137 467 1957 667"> <thead> <tr> <th>Estate / Mill</th> <th>Fiber, MT</th> <th>FFB, MT</th> <th>Usage / FFB (MT)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Bukit Puteri POM</td> <td>4,871.72</td> <td rowspan="3">60,221.51</td> <td>0.08</td> </tr> <tr> <td>Shell, MT</td> <td>Usage / FFB (MT)</td> </tr> <tr> <td>7,226.58</td> <td>0.12</td> </tr> </tbody> </table> <p>The mill and estate monitored the diesel usage per ton FFB process/production on monthly basis. Reviewed the data FY 2022 as follows:</p> <table border="1" data-bbox="1137 783 1928 997"> <thead> <tr> <th>Estate / Mill</th> <th>Diesel, (MT)</th> <th>FFB, (MT)</th> <th>Diesel / FFB (MT)</th> </tr> </thead> <tbody> <tr> <td>Bukit Puteri Estate</td> <td>82,738.00</td> <td>38,168.14</td> <td>2.18</td> </tr> <tr> <td>Bukit Puteri POM</td> <td>3,472.00</td> <td>60,221.51</td> <td>0.24</td> </tr> </tbody> </table>	Estate / Mill	Fiber, MT	FFB, MT	Usage / FFB (MT)	Bukit Puteri POM	4,871.72	60,221.51	0.08	Shell, MT	Usage / FFB (MT)	7,226.58	0.12	Estate / Mill	Diesel, (MT)	FFB, (MT)	Diesel / FFB (MT)	Bukit Puteri Estate	82,738.00	38,168.14	2.18	Bukit Puteri POM	3,472.00	60,221.51	0.24	
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<p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>																											
<p>7.10.1</p>	<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. - Critical (Major) compliance -</p>	<p>The GHG emissions are identified and assessed for the unit certification by sustainability team. RSPO Palm GHG Calculator version 4 is used. The consumption of fertilisers and diesel were verified through Estates:</p> <ul style="list-style-type: none"> • FFB record book • Stock book • Monthly stock issue • Stock requisition note Mill 	<p>Complied</p>																								

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		<ul style="list-style-type: none"> • Mill Month End Production Report • Monthly production report • Flowmeter & running hours record book • Bio-gas generation daily monitoring log sheet <p>Effluent analysis report Based on the verification of records; all the sampled issuance was traceable</p>	
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new development by the certification unit.	Not Applicable
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>Assessment of all polluting activities was conducted under Environmental Risk Assessment for identifying activities that contributes significant impact to environment including gaseous emission. Among the plan for pollution preventive action Plan FY 2022/2023 were:</p> <ul style="list-style-type: none"> • To ensure the preventive maintenance vehicles checklist were in place. Regularly inspection is carried out to these vehicles. • To place tray underneath the vehicles. <p>Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.</p> <p>As prescribed under DOE’s Compliance Schedule, the mill is obliged to conduct stack sampling minimum once a year. Below are the verified reports (Isokinetic Stack & Air Emission Monitoring Report):</p> <p><u>2nd Half 2022</u></p> <ul style="list-style-type: none"> • Report no.: ALM/TCMSB/0223/8256 	Complied

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		<ul style="list-style-type: none"> • Report date: 01/03/2023 • Result: Dust: 33.90 mg/m³ (B5) vs limit 150, CO: 2.3 mg/m³ vs limit 1000 @ 12% CO₂ <p>For Air Pollution Control System, management use Electrostatic Precipitator (ESP) for monitoring. Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were monitored.</p> <p>Sighted Online Environmental Reporting (OER) has been submitted to DOE on quarterly basis. The result within parameter as per Jadual Pematuhan AS(B)31/152/000/067 Licence No: 003124.</p> <p>Environmental audit by 3rd party has been conducted 2 times yearly by Assessor Mr Mohd Hairimi Mohd Ali dated 23/05/2022 and 20/1/2022.</p> <p>Latest DOE visit was sighted on 23/02/2023 with report reference number A002281. Sighted reports details and 3 issue has been raised. Response by management units has been submitted on 22/03/2023.</p>	
<p>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</p>			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>There is no New Planting at Bukit Puteri Certification unit. Verification through document review, interview and site visit confirmed that there is no replanting prepared by burning. Refer Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. Management complying with the Malaysian environmental law – EQA and Regulations 1974. No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.</p>	Complied

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7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Fire prevention measure has been established. Refer Emergency Preparedness and Response Procedures. Refer document no. UM/HSE/SP/02.	Complied											
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	There is evidence that management has engaged with stakeholders regarding on fire prevention and control measures. Refer Stakeholder meeting dated 07/02/2023. Refer Section 6.0 item 6.3. stated details on Fire Prevention.	Complied											
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.														
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -	As verified with estate representative, no new planting or land clearing conducted in the certification units since 15/11/2018.	Complied											
7.12.2	(C) HCVs, HCS forests and other conservation areas are identified as follows: a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid. b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations. PROCEDURAL NOTE:	SOU 10 Bukit Puteri Estate has conducted HCV assessment dated March 2016. Refer High Conservation Value (HCV) Re Assessment for Pahang Zone: SOU 10 Bukit Puteri by Group Sustainability Department (previously known as PSQM Department) Sime Darby Plantation Sdn. Bhd (Currently known as Sime Darby Plantation Berhad)/ Final Report (Version II) dated March 2016. Details of HCV areas as below <table border="1" data-bbox="1137 1214 1921 1364"> <thead> <tr> <th>Estate</th> <th>Area</th> <th>Ha</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Bukit Puteri</td> <td>River reserve (Sg. Telang)</td> <td>17.77</td> <td>4</td> </tr> <tr> <td>Water catchment</td> <td>2.81</td> <td>4</td> </tr> </tbody> </table>	Estate	Area	Ha	HCV	Bukit Puteri	River reserve (Sg. Telang)	17.77	4	Water catchment	2.81	4	Complied
Estate	Area	Ha	HCV											
Bukit Puteri	River reserve (Sg. Telang)	17.77	4											
	Water catchment	2.81	4											

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	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 -		Pond	0.78	4											
			Total	21.36												
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not Applicable				Not Applicable										
7.12.4	(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>No new planting after 15 November 2018 within SOU 10 Bukit Puteri. Base on the HCV identified in the report, the estate has established management plan for the year 2023. Refer HCV Management Plan Bukit Puteri Estate dated 05/01/2023. Reviewed the implementation of the management plan as follows:</p> <table border="1" style="width: 100%;"> <thead> <tr> <th>Objective</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>To ensure the signage is maintain at site and retrievable on map</td> <td>Marking of slope (Erosion prone area on the map and in the field</td> </tr> <tr> <td>To update the monitoring record of HCV area by AP</td> <td>Monitoring by photo (with date) of supervision / monitoring HCV area.</td> </tr> <tr> <td>To promote awareness on HCV</td> <td>Briefing to the workers regarding HCV by SSSO</td> </tr> <tr> <td>To ensure no spraying, burning and agrochemical activities near HCV area</td> <td>Muster briefing to include HCV related (policy 7) Legal compliance.</td> </tr> </tbody> </table>				Objective	Action Plan	To ensure the signage is maintain at site and retrievable on map	Marking of slope (Erosion prone area on the map and in the field	To update the monitoring record of HCV area by AP	Monitoring by photo (with date) of supervision / monitoring HCV area.	To promote awareness on HCV	Briefing to the workers regarding HCV by SSSO	To ensure no spraying, burning and agrochemical activities near HCV area	Muster briefing to include HCV related (policy 7) Legal compliance.	Complied
Objective	Action Plan															
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To promote awareness on HCV	Briefing to the workers regarding HCV by SSSO															
To ensure no spraying, burning and agrochemical activities near HCV area	Muster briefing to include HCV related (policy 7) Legal compliance.															
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	There was no rights of local communities been identified in HCV areas, HCS forest after 15/11/2018, peat land and other conservation areas.				Complied										

	- Minor compliance -		
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>SOU 10 Bukit Puteri Estate has conducted HCV assessment dated March 2016. Refer High Conservation Value (HCV) Re Assessment for Pahang Zone: SOU 10 Bukit Puteri by by Group Sustainability Department (previously known as PSQM Department) Sime Darby Plantation Sdn. Bhd (Currently known as Sime Darby Plantation Berhad)/ Final Report (Version II) dated March 2016.</p> <p>There is no RTE recorded. Evidence during site verification, discourage illegal or hunting, fishing, or collecting activities signboard were maintained and implemented.</p> <p>Sighted monitoring has been done. Refer Monitoring of HCV & Conservation Areas Bukit Puteri Estate 02/02/2023.</p> <p>The estates management continue to promote awareness on HCV/RTE to the workers during morning briefing and training. Refer Briefing regarding Schedule Waste, open burning, buffer zone and HCV dated 20/03/2023.</p>	Complied
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The audit findings have confirmed that there are no new HCVs, HCS forests peatland and other conservation areas been identified after 15/11/2018 in all estates sampled.</p> <p>Monitoring of these areas are made through the daily field supervision by the field staff and executives. Sighted monitoring has been done. Refer Monitoring of HCV & Conservation Areas Bukit Puteri Estate 02/02/2023.</p> <p>The estates management continue to promote awareness on HCV/RTE to the workers during morning briefing and training. Refer latest training that has been conducted on 03/02/2023.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15</p>	<p>No land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15/11/2008 2018 within certification unit.</p>	Complied

	November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -		
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for **Bukit Puteri 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 **2022** for **Bukit Puteri POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.64
PKO	0.00

Extraction	%
OER	21.34
KER	4.32

Production	t/yr
FFB Process	60,246.51
CPO Produced	12,854.435
PKO Produced	0.00

Land Use	Ha
OP Planted Area	14310.22
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	0.00
Total	14310.22

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	0.00	0.00	36,320.91	0.94	0.00	0.00	36,320.91	0.94
CO ₂ Emission from fertilizer	0.00	0.00	3,679.55	0.10	0.00	0.00	3,679.55	0.10
NO ₂ Emission	0.00	0.00	1,781.69	0.05	0.00	0.00	1,781.69	0.05
Fuel Consumption	0.00	0.00	14.60	0.00	0.00	0.00	14.60	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	0.00	0.00	-32,867.87	0.00	0.00	0.00	-32,867.87	0.00
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.00	0.00	89,28.88	0.23	0.00	0.00	8,928.88	0.23

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	11,809.34	0.20
Fuel Consumption	2.49	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	11,811.82	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

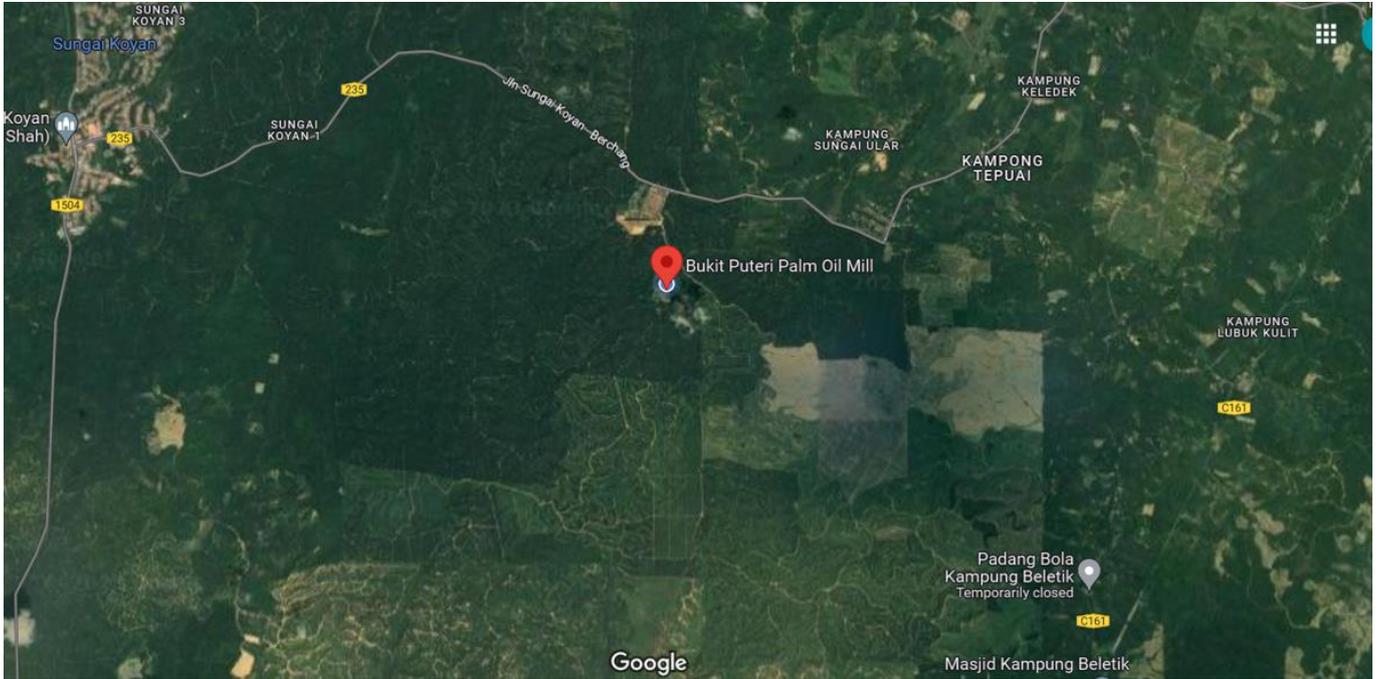
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0.00
Divert to anaerobic diversion (%)	100

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0.00
Divert to methane captured (energy generation) (%)	0.00

Appendix C: Location Map of Certification Unit and Supply bases



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Appendix E: List of Smallholder Registered and/or sampled

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
Not Applicable									
Total									

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