

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

☐ Initial Assessment

☒ Annual Surveillance Assessment (2_3)

☐ Recertification Assessment (Choose an item.)

☐ Extension of Scope

Client Company Name / Parent Company: SD Guthrie 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 16) – Kok Foh Palm Oil Mill
Location of Certification Unit: 72109 Bahau, Negeri Sembilan, Malaysia
Date of Final Report: 27/08/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	SD Guthrie 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 16) – Kok Foh Palm Oil Mill		
Location / Address	72109 Bahau, Negeri Sembilan, Malaysia		
Website	www.simdarbyplantation.com		
Management Representative	Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, Group Sustainability Department (GSD))	E-mail	shylaja.vasudevan@simedarbyplantation.com
Telephone	+03-7848 4000	Facsimile	+03-7848 4363

2. Certification Information			
Certificate Number	RSPO 805932	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_3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 of the RSPO P&C 2018		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	45MT/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
GGC-SDP001-MSPO-03-2018	MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders	Global Gateway Certifications	08/07/2026
GGC-SDP002-MSPO-03-2018	MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		08/07/2026
GGC-SDP002-MSPOSCCS-01-2019	MSPO Supply Chain Certification Standard 2018		08/07/2026

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Kok Foh Oil Mill	72109 Bahau, Negeri Sembilan	2°47.08' N	102°30.25' E
Kok Foh Estate	72109 Bahau, Negeri Sembilan	2°47.08' N	102°30.25' E
Sg. Senarut Estate	85100 Batu Anam, Segamat, Johor	2°34.16' N	102°45.20' E
Muar River Estate	85009 Segamat, Johor	2°34.26' N	102°45.08' E
Pertang Estate	Simpang Pertang, 72300 Jelebu, Negeri Sembilan	2°57.25' N	102°18.12' E
Bkt Pilah Estate	73500 Rompin, Negeri Sembilan	2°33.73' N	102°55.91' E
St. Helier Estate	72009 Kuala Pilah, Negeri Sembilan	2°33.72' N	102°33.73' E
Sg. Sabaling Estate	72100 Bahau, Negeri Sembilan	2°50.56' N	102°29.03' E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes	
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Kok Foh Estate	2,133.99	7.95	133.90	2,275.84	93.77%
Sg. Senarut Estate	1,440.47	5.72	1,512.19	2,958.38	48.69%
Muar River Estate	1,453.35	0.45	130.82	1,584.62	91.72%
Pertang Estate	950.17	0.07	102.25	1,052.49	90.28%
Bkt Pilah Estate	625.8	7.99	3,033.52	3,667.31	17.06%
St. Helier Estate	754.6	0.86	1,237.19	1,992.65	37.87%
Sg. Sabaling Estate	124.23	2.56	1,194.56	1,321.35	9.40%

Total	7,482.61	25.6	7,344.43	14,852.64	
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*Change of planted area due to re-survey during replanting

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Kok Foh Estate	259.83	753.27	1,120.89	0	1,874.16	259.83
Sg. Senarut Estate	288.13	0	1,152.34	0	1,152.34	288.13
Muar River Estate	246.4	613.81	548.4	44.74	1,206.95	246.4
Pertang Estate	73.86	345.9	456.55	73.86	876.31	73.86
Bkt Pilah Estate	28.45	0	597.35	0	597.35	28.45
St. Helier Estate	0	325.98	428.62	0	754.6	0
Sg. Sabaling Estate	0	0	124.23	0	124.23	0
Total (ha)	896.67	2,038.96	4,428.38	118.6	6,585.94	896.67
Note: Only Mature area is considered as production area						

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2023 – July 2024)	Actual (May 2023 – April 2024)		Forecast (July 2024 – June 2025)
		Previous license period (May – June 2023)	Current license period (July 2023 – Apr 2024)	
Kok Foh Estate	33,960.49	4,307.62	26,214.67	33,960.00
Sg. Senarut Estate	21,472.00	2,776.52	14,356.81	21,000.00
Muar River Estate	22,793.33	3,316.18	17,844.03	22,781.19
Pertang Estate	15,906.96	1,972.27	15,198.35	17,000.00
Bkt Pilah Estate	7,710.80	431.22	8,882.71	12,000.00
St. Helier Estate	18,500.00	1,101.02	14,365.48	17,413.00
Sg. Sabaling Estate	5,053.58	400.00	2,448.92	2,800.00
Total	125,397.16	113,615.80		126,954.19

8. Summary of Certified Tonnage of FFB (from other certified unit(s))			
Estate / Smallholders	Tonnage (MT) / year		
	Estimated last year	Actual (May 2023 – April 2024)	Forecast

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	(Aug 2023 – July 2024)	Previous license period (May – June 2023)	Current license period (July 2023 – Apr 2024)	(July 2024 – June 2025)
N/A		N/A	N/A	
Total		N/A		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2023 – July 2024)	Actual (May 2023 – April 2024)		Forecast (July 2024 – June 2025)
		Previous license period (May – June 2023)	Current license period (July 2023 – Apr 2024)	
A.Panas & Pegoh		882.52	3,337.77	
Biofresh Synergies Sdn Bhd		75.44	1,621.71	
Cheong Wing Chan Sdn Bhd		4,555.03	7,595.06	
Eksklusif Pesona Sdn Bhd		2,002.82	7,073.33	
Eng Huat Latex Concentrate		9,719.91	41,871.49	
Langkah Berjasa		485.87	1,410.24	
Permodalan Pelangi Sdn Bhd		2,785.75	9,242.33	
A.Panas & Pegoh		882.52	3,337.77	
Biofresh Synergies Sdn Bhd		75.44	1,621.71	
Total		98,576.71		

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	May 2023	7,165.41	11,825.34	18,990.75
2	June 2023	7,139.42	8,682.00	15,821.42
3	July 2023	7,596.83	8,698.16	16,294.99
4	Aug 2023	9,328.13	9,279.99	18,608.12
5	Sept 2023	10,260.00	9,057.42	19,317.42
6	Oct 2023	11,156.05	10,640.45	21,796.50

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7	Nov 2023	10,728.34	6,314.29	17,042.63
8	Dec 2023	9,858.84	7,135.96	16,994.80
9	Jan 2024	9,948.79	6,876.69	16,825.48
10	Feb 2024	8,770.68	5,030.89	13,801.57
11	Mar 2024	10,091.13	7,464.01	17,555.14
12	Apr 2024	11,572.18	7,571.51	26,714.67
TOTAL		113,615.80	98,576.71	219,763.5

10. Summary of Certified Tonnage (MT) (not applicable for ISS)

Estimated last year (Aug 2023 – July 2024)	Actual (May 2023 – April 2024)		Forecast (July 2024 – June 2025)
	Previous license period (May – June 2023)	Current license period (July 2023 – Apr 2024)	
FFB	FFB		FFB
125,397.16 mt	14,304.83 mt	99,310.97 mt	126,954.19 mt
	TOTAL	113,615.80 mt	
CPO (OER: 20.0 %)	CPO (OER: 20.34 %)		CPO (OER: 20.8 %)
25,079.43 mt	2,910.39 mt	20,478.13 mt	26,406.47 mt
	TOTAL	23,388.52 mt	
PK (KER: 5.00 %)	PK (KER: 5.0 %)		PK (KER: 4.60 %)
6,269.85 mt	711.23 mt	4,719.03 mt	5,839.89 mt
	TOTAL	5,430.26 mt	

10A. Monthly Records of Certified CPO & PK since the last audit

No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	May 2023	1,467.08	380.49
2	June 2023	1,443.31	330.78
3	July 2023	1,597.43	360.87
4	Aug 2023	1,939.87	451.29
5	Sept 2023	2,156.74	472.39
6	Oct 2023	2,290.98	540.48
7	Nov 2023	2,179.93	509.40
8	Dec 2023	2,090.95	430.89
9	Jan 2024	1,990.46	484.60

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10	Feb 2024	1,865.84	419.21
11	Mar 2024	2,119.01	524.53
12	Apr 2024	2,246.92	525.33
TOTAL		23,388.52	5,430.26

11. Summary of Actual Volume sold

Current License period (July 2023 – Apr 2024)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	199.37	0	0	13,800.95	14,000.32
PK (MT)	2,241.28	0	0	2,302.03	4,543.31
Credits	6,000.00	-	-	-	6,000.00

Previous License period (May – June 2023)

CPO (MT)	-	-	-	-	-
PK (MT)	331.16	0	0	502.6	833.76
Credits	-	-	-	-	-

Note:

Conventional is RSPO certified material but sold as non-RSPO.

Opening balance for May 2023: CPO – 203.55 mt, PK – 128.53 mt

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-19a04ba3-3d4c TR-18558f1e-59f7 TR-b87ba388-a131 TR-6f736c23-1f1f TR-a4d0b1f4-10c4 TR-3f3c8bd8-8fd9 TR-1a4242e7-e0e6 TR-ba8958f5-98c5 TR-f3c5ef14-e338 TR-5fbf4e9d-f497 TR-fee9da55-feb6 TR-3afde7a7-3abb TR-a81b0df3-727d TR-56f8af6d-84c2	-	2,572.44

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		TR-e2c4a2b5-1b97 TR-cbb0358d-306a TR-5cc1471e-91e2 TR-7849f2c9-762b TR-e41c30d0-1a52 TR-fdfb1023-46ea TR-2eb2e84f-60f8 TR-282660d1-b148 TR-0470b3a3-9d2f		
2	Buyer B	TR-fef97340-4bd2	199.37	-
TOTAL			199.37	2,572.44

11B. Records of certified CPO & PK Sold under other schemes since the last audit (May 2023 – Apr 2024)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	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 (May 2023 – Apr 2024)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	Buyer AA	7,189.15	0.00
2	Buyer BB	6,611.80	0.00
3	Buyer CC	0.00	1,049.63
4	Buyer DD	0.00	1,755
TOTAL		13,800.95	2,804.63

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (May 2023 – Apr 2024)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
1	BUYER AAA	ST-TR-58ec48ef-6b31	6,000.00
TOTAL			6,000.00

12. Independent Smallholders Certified Tonnage (MT) / Volume									
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	

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Phase	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)
1	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL		N/A	N/A	N/A	N/A	N/A
Note: 1 mt = 1 credit						

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
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)
1	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

Section 2: Assessment Process

Certification Body:

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

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **20/05/2024 – 24/05/2024**. 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 **9/08/2024**. 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 certification unit 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-years cycle

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA2-1)	Year 3 (ASA2-2)	Year 4 (ASA2-3)	Year 5 (ASA2-4)
Kok Foh POM	Carried out by previous CB	Carried out by previous CB	Carried out by previous CB	√	√
Kok Foh Estate				√	-
Sg. Senarut Estate				√	√
Muar River Estate				-	√
Pertang Estate				√	-
Bkt Pilah Estate				-	√
St. Helier Estate				-	√
Sg. Sabaling Estate				√	-

Tentative Date of Next Visit: May 20, 2025 - May 23, 2025

Total Number of Mandays: 15 Man days

2.2 BSI Assessment Team

Name	Role	Competency
Mohamed Hidhir Bin Zainal Abidin (MHZ)	Team Leader	Education: Bachelor Degree in Chemical Engineering, National University of Malaysia, 2006 Work Experience: 1) 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. 2) Auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO since 2012. Training attended: 1) ISO 9001 Lead Auditor Course 2) ISO 14001 Lead Auditor Course 3) OHSAS 18001 Lead Auditor Course in 2012 4) Endorsed RSPO P&C Lead Auditor Course in 2013 5) MSPO Awareness Training in 2014 6) Endorsed RSPO SCCS Lead Auditor Course 7) SMETA Auditor training

		<p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Mohd Razaleigh Bin Mohamad (MRM)	Team Member	<p>Education: Holds a Bachelor Degree in Plantation Management and Agrotechnology, University Technology Mara (UiTM).</p> <p>Work Experience: He has 5 years' experience in Oil Palm Estate Management with Tradewinds Plantation Berhad. The last position held was Senior Assistant Manager. He has more than 4 years of experience in Third Party Certification Audit with Control Union (M) Sdn Bhd for RSPO P&C, MSPO P&C and GLOBALG.A.P. IFA Fruits and Vegetables. Qualified as RSPO Lead Auditor and approved to conduct Environmental and Social elements.</p> <p>Training attended: He has completed ISO 9001-2015 Lead Auditor Course, ISO14001- 2015 Lead Auditor Course, ISO45001-2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed MSPO P&C Lead Auditor Course, Social Accountability SA8000 Auditor Course, RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Trainings (P&C and SCCS).</p> <p>Language proficiency: Fluent in English and Bahasa Malaysia</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Nor Halis Bin Abu Zar (NHA)	Team Member	<p>Education: Bachelor of Science, Plantation Technology and Management, graduated from UiTM in 2012 and Diploma in Plantation and Industry Management from UiTM in 2009.</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 RSPO P&C 2018 MYNI 2019 and MS2530:2013. He mainly covered for ENV and OSH and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia and International Level.</p> <p>Training attended: He has completed RSPO P&C Lead Auditor Course in Oct 2020, Refresher RSPO P&C Lead Auditor Course in May 2022, RSPO ISH Standard 2019 in December 2021 and August 2023, RSPO SCC 2020 in September 2022, QMS 9001:2015 Lead Auditor Course in April 2019, OSH 45001:2018 Lead Auditor Course in June 2021, IMS (ISO 9001:2015 & ISO 14001:2015) Lead Auditor Course, HCV & HCS Training in August 2022, MSPO 2530:2013 Lead Auditor Course in February 2019, , MSPO SCCS Auditor in February 2019 and also trained in SMETA Requirement Training on May 2021</p>

		Language proficiency: Fluent in English and Bahasa Malaysia Aspect covered in this audit: <input checked="" type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)
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Accompanying Persons:

Name	Role
N/A	N/A

2.3 Assessment Plan

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

Date	Time	Subjects	MHZA	NHA	MRM
Sunday 19/05/2024	PM	Audit team travel Bahau.	✓	✓	✓
Monday 20/05/2024 Kok Foh Estate	0730	Audit team travel to Kok Foh Estate for opening meeting	✓	✓	✓
	0830 0900	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). • Verification on previous audit findings 			
	0930 1300	Kok Foh Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	✓	✓	✓
	1300 1400	Lunch	✓	✓	✓
	1400 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	✓	✓	✓

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Date	Time	Subjects	MHZA	NHA	MRM
	1630 1700	Interim Closing Briefing	✓	✓	✓
Tuesday 21/05/2024	0730	Audit team travel to Kok Foh POM	✓	✓	✓
Kok Foh POM	0830 1300	Kok Foh POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area.			
	1000 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	✓
	1300 1400	Lunch break	✓	✓	✓
	1400 1630	Kok Foh POM Document Review P1 – P7: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc RSPO Supply chain requirements for mill - Mass Balance Model - Internal Audit - Outsourcing activities - Purchasing and Goods In - Sales and Goods Out - Outsourcing Activities - Record keeping - Extraction Rate - Processing - Registration of transaction - Claims	✓	✓	✓

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	1630 1700	Interim Closing Briefing	✓	✓	✓
Wednesday 22/05/2024	0730	Audit team travel to Simpang Pertang	✓	✓	✓
Pertang Estate	0830 1300	Pertang Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.			
	1000 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	✓
	1300 1400	Lunch break	✓	✓	✓
	1400 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	✓	✓	✓
	1630 1700	Interim Closing Briefing	✓	✓	✓
Thursday 23/05/2024	0730	Audit team travel to Batu Anam/Segamat	✓	✓	✓
Sg Senarut Estate	0830 1300	Sg Senarut Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.			
	1000 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	✓

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Date	Time	Subjects	MHZA	NHA	MRM
	1300 1400	Lunch break	✓	✓	✓
	1300 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	✓	✓	✓
	1630 1700	Closing meeting – conclusion and recommendation	✓	✓	✓
Friday 24/05/2024 Sg Sabaling Estate	0730	Audit team travel to Sg Sabaling Estate	✓	✓	✓
	0830 1300	Sg Sabaling Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.			
	1300 1400	Lunch break & Friday prayer	✓	✓	✓
	1400 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	✓	✓	✓
	1630 1700	Closing meeting – conclusion and recommendation at Kok Foh Estate	✓	✓	✓

Major NC close out verification

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PRELIMINARY AGENDA		
Time	Subjects	MHZ
Friday 9/08/2024		
0730	Audit team travel to Sg Senarut Estate	✓
0830 – 0900	Opening Meeting <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Briefing on the verification plan 	
0900 – 1000	Major NC verification <ul style="list-style-type: none"> 2499036-202405-M1, 2499036-202405-M3 – Document review and management/worker's interview and site observation. 	✓
1030 – 1130	Auditor travel to Kok Foh Palm Oil Mill and Sg Sabaling Estate	✓
1130 – 1300	Major NC verification (Sg Sebalang Estate) <ul style="list-style-type: none"> 2499036-202405-M5 – Document review and management/worker's interview and site observation. 	✓
1300 - 1400	Lunch break and Friday prayer	✓
1400 - 1600	Major NC verification (Kok Foh POM) <ul style="list-style-type: none"> 2499036-202405-M1, 2499036-202405-M2, 2499036-202405-M4 – Document review and management/worker's interview and site observation. 	✓
1630 - 1700	Closing meeting – conclusion and recommendation	✓

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	SD Guthrie Berhad (at the point of this audit known as Sime Darby Plantation Berhad) TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table. On 16/01/2020, SD Guthrie Berhad (at the point of this audit known as Sime Darby Plantation Berhad) under its subsidiary 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): https://sime-darby-plantation.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	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, SD Guthrie Berhad (at the point of this audit known as Sime Darby Plantation Berhad) acquired Bintang Palm Oil Mill in Johor in April 2017. As of 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 SD Guthrie Berhad (at the point of this audit known as Sime Darby Plantation Berhad) have no control in the management. Refer TBP approval dated 13/07/2023.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	There are no new acquisitions. There is new propose on 2024 for Land legalization still in progress dated approval by RSPO on 13 July 2023 for these Estate. (1) Ladang Panjang Estate: 1,796.19 Ha. (2) Rantau Panjang Estate, Napal Estate / Karang Ringin Estate: 1,843.73 Ha. (3) Mangun Jaya Estate: 1,398.55 Ha. (4) Sungai Jernih Estate: 851.57 Ha. (5) Pelanjau Estate (PT BAL) & Beturus Estate (PT BAL): 4,071.76 Ha. (6) Karya Palma Estate (PT SNP): 476.70 Ha. West and East Estate: 1,452.93 Ha.	Complied

Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Although there is deviation has been identified at those Indonesia management units, but it has been justified and approved by RSPO Secretariat on 13/07/2023 that these units are still awaiting to receive land titles.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	<p><u>Indonesia</u></p> <ul style="list-style-type: none"> - 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 were sold and currently SD Guthrie Berhad (at the point of this audit known as 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. <p><u>Malaysia</u></p> <ul style="list-style-type: none"> - 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: SD Guthrie Berhad (at the point of this audit known as Sime Darby Plantation Berhad) acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction. <p><u>Papua New Guinea</u></p> <ul style="list-style-type: none"> - Markham Farming Company Limited (MFCL)/ Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: www.rspo.org/certification/public-announcement <p><u>Liberia</u></p> <ul style="list-style-type: none"> - As at 16/01/2020, SD Guthrie Berhad (at the point of this audit known as 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): https://sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/. 	Complied

	ACOP 2022 has been cross-referenced as below: https://rspo.org/members/1-0008-04-000-00/	
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	Although there are lapses has been identified at those Indonesia management units, but it has been justified that these units are still awaiting to receive land titles.	Complied
Have there been any 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	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as these 2 assets were disposed.	Complied
Un-Certified Units or Holdings		
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.	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. Refer TBP approval dated 13/07/ 2023.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>New plantings within SD Guthrie Berhad (at the point of this audit known as Sime Darby Plantation Berhad) that have completed NPP notification:</p> <p>(1) NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/</p> <p>(2) NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/ 2018 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/</p> <p>(3) NBPOL (Ramu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/</p> <p>(4) NBPOL (Ramu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/</p> <p>(5) NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/</p> <p>(6) NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/</p>	Complied

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	<p>(7) NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/</p> <p>(8) NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/</p> <p>(9) NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/</p> <p>(10) NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/</p> <p>(11) NBPOL (Ramu Agri Industries Ltd) 06/03/2012 – no comments captured in RSPO website: https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/</p> <p>(12) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/</p> <p>(13) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/</p> <p>(14) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/</p> <p>Management units for 12 – 14 above were disposed.</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>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have 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 discrepancies between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia</p>	Complied

	<p>Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of August 2023, 16 out of 19 management units in Indonesia operations completed LUCA review with 1 Concept note (covering all 19 affected manage units) has been endorsed by RSPO.</p> <p>As per Internal Audit conducted in 16-25 Oct 2023, and 13-17 Nov 2023, 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 land conflict has been lodge by stakeholders as at the day of audit.</p>	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	<p>SD Guthrie Berhad (at the point of this audit known as 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 16-25 Oct 2023, and 13-17 Nov 2023, no labour dispute issues 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>SD Guthrie Berhad (at the point of this audit known as Sime Darby Plantation Berhad) have published Grievance mechanism that is applied to all management units. Disputes related to labour, 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>SD Guthrie Berhad (at the point of this audit known as Sime Darby Plantation Berhad) maintains 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>Under RSPO DSF, the latest registered complaint for SD was in 2017. No latest complaint case reported in DSF.</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 is mainly waiting for Land Titles. The last audit was conducted in 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. HCV Assessment has been conducted</p>	Complied

	for all SDP operations since 2010, there has been no clearance of HCV areas after the HCV Assessment has been conducted and verified during the annual RSPO External and Internal Audit reports. The liability happened as there were no HCV Assessment done at the time of planting for the cases which were entered into the RACP process.	
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites are maintaining the stakeholder engagements as part of the estates/mills' operations. Especially in Indonesia, socialization of company.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

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

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Approved Time Bound Plan

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	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	REVISION OF THE TBP (Only applicable when revision is made)			
								Any revision from the last approved TBP? (Yes / No)	New Proposed Year for Certification	Justification of changes for each UoC	Date of approval from RSPO
Manggala	Indonesia	Manggala Mill	13,836.00	Certified	N/A	23-Nov-10					
	Indonesia	Manggala -1 Estate	4,919.00	Certified	N/A	23-Nov-10					
	Indonesia	Manggala -2 Estate	4,922.00	Certified	N/A	23-Nov-10					
	Indonesia	Manggala -3 Estate	3,995.00	Certified	N/A	23-Nov-10					
Alur Dumai	Indonesia	Alur Dumai Mill	3,759.00	Certified	N/A	16-Jan-12					
	Indonesia	Alur Dumai Estate	3,759.00	Certified	N/A	16-Jan-12					
Teluk Siak	Indonesia	Teluk Siak Mill	11,555.31	Certified	N/A	11-Oct-11					
	Indonesia	Teluk Siak Estate	3,321.20	Certified	N/A	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	3,799.21	Certified	N/A	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	448.00	Not Certified	2023	N/A		Yes	2024	Land legalization process for 448 ha at Pinang Sebatang Estate is still in process.	13-Jul-23
	Indonesia	Aneka Persada Estate	4,434.90	Certified	N/A	11-Oct-11					
Blang Simpo	Indonesia	Blang Simpo Mill	8,777.22	Certified	N/A	3-May-13					
	Indonesia	Blang Simpo -1 Estate	3,460.06	Certified	N/A	3-May-13					
	Indonesia	Blang Simpo -2 Estate	2,677.83	Certified	N/A	3-May-13					
	Indonesia	Tamiang (PT PPP) Estate	1,451.99	Certified	N/A	3-May-13					
	Indonesia	Batang Ara (PT PSK) Estate	1,187.34	Certified	N/A	3-May-13					

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Teluk Bakau	Indonesia	Teluk Bakau Mill	13,317.81	Certified	N/A	11-Oct-11					
	Indonesia	Teluk Bakau Estate	4,025.07	Certified	N/A	11-Oct-11					
	Indonesia	Nusa Lestari Estate	3,456.74	Certified	N/A	11-Oct-11					
	Indonesia	Nusa Perkasa Estate	5,836.00	Certified	N/A	11-Oct-11					
Mandah	Indonesia	Mandah Mill	12,366.18	Certified	N/A	1-Apr-14					
	Indonesia	Mandah Estate	5,053.18	Certified	N/A	1-Apr-14					
	Indonesia	Rotan Semelur Estate	7,313.00	Certified	N/A	1-Apr-14					
Sungai Pinang	Indonesia	Sungai Pinang Mill	6.51	Certified	N/A	11-Sep-12					
	Indonesia	Sungai Pinang Estate	3,374.42	Certified	N/A	11-Sep-12					
	Indonesia	Bukit Pinang Estate	3,138.58	Certified	N/A	11-Sep-12					
Ladang Panjang	Indonesia	Ladang Panjang Mill	1,202.04	Certified	N/A	9-Jul-12					
	Indonesia	Ladang Panjang Estate	1,202.04	Certified	N/A	9-Jul-12					
	Indonesia	Ladang Panjang Estate	1,796.19	Not Certified	2023	NA		Yes	2024	Land legalization process for 1,796.19 ha is still in progress.	13-Jul-23
Rantau Panjang	Indonesia	Rantau Panjang Mill	10,139.91	Certified	N/A	16-Mar-12					
	Indonesia	Bumi Ayu Estate	2,960.98	Certified	N/A	16-Mar-12					
	Indonesia	Rantau Panjang Estate	2,679.74	Certified	N/A	16-Mar-12					
	Indonesia	Rantau Panjang Estate	1,843.73	Not Certified	2023	NA		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Napal Estate/Karang Ringin	4,359.74	Certified	N/A	16-Mar-12					

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	Indonesia	Napal Estate/Karang Ringin	1,843.73	Not Certified	2023	N/A		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Mangun Jaya Estate	139.45	Certified	N/A	16-Mar-12					
	Indonesia	Mangun Jaya Estate	1,398.55	Not Certified	2023	N/A		Yes	2024	Land legalization process of 1398.55 ha is still in process.	13-Jul-23
	Indonesia	Sungai Jernih Estate	851.57	Not Certified	2023	N/A		Yes	2024	Land legalization process of 851.57 ha is still in process.	13-Jul-23
Angsana	Indonesia	Angsana Mill	15,151.19	Certified	N/A	6-Jul-11					
	Indonesia	Angsana Estate	3,250.06	Certified	N/A	6-Jul-11					
	Indonesia	Gunung Sari Estate	2,826.94	Certified	N/A	6-Jul-11					
Mustika	Indonesia	Mustika Mill	14,840.76	Certified	N/A	3-Jul-13					
	Indonesia	Mustika Estate	3,648.74	Certified	N/A	3-Jul-13					
	Indonesia	Pantai Bonati Estate	2,534.00	Certified	N/A	6-Jul-11					
Gunung Aru	Indonesia	Gunung Aru Mill	12,740.54	Certified	N/A	5-Jul-11					
	Indonesia	Gunung Aru Estate	2,684.41	Certified	N/A	5-Jul-11					
	Indonesia	Gunung Kemas Estate	3,511.36	Certified	N/A	5-Jul-11					
	Indonesia	Laut Timur Estate	3,207.28	Certified	N/A	5-Jul-11					
	Indonesia	Pantai Timur Estate	3,337.49	Certified	N/A	5-Jul-11					

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Ungkaya	Indonesia	Ungkaya Mill	4,145.00	Certified	N/A	10-Jul-12					
	Indonesia	Ungkaya Estate	4,145.00	Certified	N/A	10-Jul-12					
Rantau	Indonesia	Rantau Mill	24,169.56	Certified	N/A	30-Dec-11					
	Indonesia	Rantau Estate	4,638.00	Certified	N/A	30-Dec-11					
	Indonesia	Matalok Estate	3,082.00	Certified	N/A	30-Dec-11					
	Indonesia	Selabak Estate (PT SAA)	3,757.67	Certified	N/A	16-Mar-12					
	Indonesia	Randi Estate (PT SAA)	2,882.98	Certified	N/A	16-Mar-12					
	Indonesia	Sangkoh Estate (PT SAA)	3,789.34	Certified	N/A	16-Mar-12					
	Indonesia	Lanting Estate (PT LMR)	3,249.27	Certified	N/A	16-Mar-12					
	Indonesia	Betung Mill	7,579.57	Certified	N/A	1-Apr-14					
Betung	Indonesia	Betung Estate	4,266.00	Certified	N/A	1-Apr-14					
	Indonesia	Sekayu Estate	3,313.57	Certified	N/A	1-Apr-14					
Bebunga	Indonesia	Bebunga Mill	14,274.77	Certified	N/A	16-Mar-12					
	Indonesia	Bebunga Estate	3,958.43	Certified	N/A	16-Mar-12					
	Indonesia	Bakau Estate	5,342.14	Certified	N/A	16-Mar-12					
	Indonesia	Sungai Cengal Estate	4,974.20	Certified	N/A	16-Mar-12					
Pondok Labu	Indonesia	Pondok Labu Mill	15,876.20	Certified	N/A	16-Mar-12					
	Indonesia	Pondok Labu Estate	3,569.53	Certified	N/A	16-Mar-12					
	Indonesia	Binturung Estate	4,072.01	Certified	N/A	16-Mar-12					
	Indonesia	Rampa Estate	3,656.20	Certified	N/A	16-Mar-12					
	Indonesia	Sesulung Estate	4,578.46	Certified	N/A	16-Mar-12					
Sekunzir	Indonesia	Sekunzir Mill	7,734.59	Certified	N/A	23-Nov-10					
	Indonesia	Sekunzir Estate	3,555.19	Certified	N/A	23-Nov-10					
	Indonesia	Seruyan Estate	4,179.40	Certified	N/A	23-Nov-10					
Sukamandang	Indonesia	Sukamandang Mill	14,779.92	Certified	N/A	5-Jul-11					
	Indonesia	Sukamandang Estate	3,936.56	Certified	N/A	5-Jul-11					
	Indonesia	Sapiri Estate	3,530.90	Certified	N/A	5-Jul-11					
	Indonesia	Baras Danum Estate	3,664.60	Certified	N/A	5-Jul-11					
	Indonesia	Kuala Kuayan Estate	3,647.86	Certified	N/A	5-Jul-11					

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Pemantang	Indonesia	Pemantang Mill	16,601.66	Certified	N/A	5-Jul-11					
	Indonesia	Pemantang Estate	3,857.91	Certified	N/A	5-Jul-11					
	Indonesia	Kawan Batu Estate	4,400.00	Certified	N/A	5-Jul-11					
	Indonesia	Hatantiring Estate	3,811.00	Certified	N/A	5-Jul-11					
	Indonesia	Batang Garing Estate	4,532.75	Certified	N/A	5-Jul-11					
Lembiru	Indonesia	Lembiru Mill	9,409.07	Certified	N/A	3-Jul-14					
	Indonesia	Lembiru Estate	4,929.49	Certified	N/A	3-Jul-14					
	Indonesia	Awatan Estate	3,476.79	Certified	N/A	3-Jul-14					
	Indonesia	Pelanjau Estate (PT BAL)	1,002.79	Certified	N/A	3-Jul-19					
	Indonesia	Pelanjau Estate (PT BAL)	4,071.76	Not Certified	2023	N/A		Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Beturus Estate (PT BAL)	4,071.76	Not Certified	2023	N/A		Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Karya Palma Estate (PT SNP)	476.70	Not Certified	2023	N/A		Yes	2024	Land legalization process for 476.70 ha is still in process.	13-Jul-23
Bukit Ajong	Indonesia	Bukit Ajong Mill	11,498.82	Certified	N/A	18-Oct-10					
	Indonesia	West Estate	4,562.34	Certified	N/A	18-Oct-10					
	Indonesia	West Estate	1,452.93	Not Certified	2023	N/A		Yes	2024	Land legalization process for 1452.93 ha (West and	13-Jul-23

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										East Estate) is still in process.	
	Indonesia	East Estate	2,665.48	Certified	N/A	18-Oct-10					
	Indonesia	East Estate/Sei Mawang	1,452.93	Not Certified	2023	N/A		Yes	2024	Land legalization process for 1452.93 ha (West and East Estate) is still in process.	13-Jul-23
Sungai Dingin	Malaysia	Sungai Dingin Oil Mill	19,517.17	Certified	N/A	12-Aug-10	19-20 July 2021				
	Malaysia	Anak Kulim Estate	1,523.35	Certified	N/A	12-Aug-10	19-20 July 2021				
	Malaysia	Sungai Dingin Estate	4,244.03	Certified	N/A	12-Aug-10	19-20 July 2021				
	Malaysia	Somme Estate	941.56	Certified	N/A	12-Aug-10	19-20 July 2021				
	Malaysia	Bukit Selarong Estate	3,896.17	Certified	N/A	12-Aug-10	19-20 July 2021				
	Malaysia	Padang Buluh Estate	4,008.47	Certified	N/A	12-Aug-10	19-20 July 2021				
	Malaysia	Bukit Hijau Estate	2,725.00	Certified	N/A	12-Aug-10	19-20 July 2021				
	Malaysia	Jentayu Estate	2,178.59	Certified	N/A	12-Aug-10	19-20 July 2021				
Chersonese	Malaysia	Chersonese Oil Mill	11,099.36	Certified	N/A	5-Oct-11	19-20 July 2021				
	Malaysia	Chersonese Estate	3,293.72	Certified	N/A	5-Oct-11	19-20 July 2021				
	Malaysia	Kalumpang Estate	2,716.80	Certified	N/A	5-Oct-11	19-20 July 2021				

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	Malaysia	Tali Ayer Estate	3,756.10	Certified	N/A	5-Oct-11	19-20 July 2021				
	Malaysia	Holyrood Estate	1,332.74	Certified	N/A	5-Oct-11	19-20 July 2021				
Elphil	Malaysia	Elphil Oil Mill	6,814.60	Certified	N/A	18-Jun-11	19-20 July 2021				
	Malaysia	Kamuning Estate	3,888.43	Certified	N/A	18-Jun-11	19-20 July 2021				
	Malaysia	Elphil Estate	1,865.43	Certified	N/A	18-Jun-11	19-20 July 2021				
	Malaysia	Kinta Kellas Estate	1,060.74	Certified	N/A	18-Jun-11	19-20 July 2021				
Flemington	Malaysia	Flemington Oil Mill	11,226.23	Certified	N/A	5-Oct-11	19-20 July 2021				
	Malaysia	Flemington Estate	1,906.84	Certified	N/A	5-Oct-11	19-20 July 2021				
	Malaysia	Bagan Datoh Estate	3,781.86	Certified	N/A	5-Oct-11	19-20 July 2021				
	Malaysia	Sabak Bernam Estate	2,511.79	Certified	N/A	5-Oct-11	19-20 July 2021				
	Malaysia	Sg. Samak Estate	3,025.74	Certified	N/A	5-Oct-11	19-20 July 2021				
Seri Intan/ Selaba	Malaysia	Seri Intan Oil Mill	14,474.29	Certified	N/A	3-Mar-11	19-20 July 2021				
	Malaysia	Selaba Oil Mill	1,549.75	Certified	N/A	3-Mar-11	19-20 July 2021				
	Malaysia	Seri Intan (+ Selaba) Estate	4,013.16	Certified	N/A	3-Mar-11	19-20 July 2021				
	Malaysia	Sabrang Estate	3,945.23	Certified	N/A	3-Mar-11	19-20 July 2021				
	Malaysia	Sogomana Estate	2,214.08	Certified	N/A	3-Mar-11	19-20 July 2021				

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	Malaysia	Sg. Wangi Estate	2,226.66	Certified	N/A	3-Mar-11	19-20 July 2021				
	Malaysia	Bikam Estate	2,075.16	Certified	N/A	3-Mar-11	19-20 July 2021				
	Malaysia	Cluny (+ Bedford) Estate	1,549.75	Certified	N/A	3-Mar-11	19-20 July 2021				
Tennamaram	Malaysia	Tennamaram Oil Mill	10,706.26	Certified	N/A	3-Mar-11	19-20 July 2021				
	Malaysia	Tennamaram Estate	1,981.60	Certified	N/A	3-Mar-11	19-20 July 2021				
	Malaysia	Sungai Buluh Estate	5,152.22	Certified	N/A	3-Mar-11	19-20 July 2021				
	Malaysia	Bukit Talang Estate	3,572.44	Certified	N/A	3-Mar-11	19-20 July 2021				
Bukit Kerayong	Malaysia	Bukit Kerayong Oil Mill	6,346.90	Certified	N/A	15-Apr-11	19-20 July 2021				
	Malaysia	Bukit Kerayong Estate	2,699.28	Certified	N/A	15-Apr-11	19-20 July 2021				
	Malaysia	Bukit Cheraka Estate	3,647.62	Certified	N/A	15-Apr-11	19-20 July 2021				
East	Malaysia	East Oil Mill	10,902.94	Certified	N/A	19-May-10	19-20 July 2021				
	Malaysia	East Estate	5,634.45	Certified	N/A	19-May-10	19-20 July 2021				
	Malaysia	Sepang Estate	2,092.28	Certified	N/A	19-May-10	19-20 July 2021				
	Malaysia	Dusun Durian Estate	3,176.21	Certified	N/A	19-May-10	19-20 July 2021				
West	Malaysia	West Oil Mill	5,912.69	Certified	N/A	19-May-10	19-20 July 2021				
	Malaysia	West Estate	5,912.69	Certified	N/A	19-May-10	19-20 July 2021				

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Bukit Puteri	Malaysia	Bukit Puteri Oil Mill	3,875.80	Certified	N/A	7-Jul-11	19-20 July 2021				
	Malaysia	Bukit Puteri Estate	3,875.80	Certified	N/A	7-Jul-11	19-20 July 2021				
Kerdu	Malaysia	Kerdu Oil Mill	13,781.50	Certified	N/A	7-Jul-11	19-20 July 2021				
	Malaysia	Kerdu Estate	5,683.04	Certified	N/A	7-Jul-11	19-20 July 2021				
	Malaysia	Mentakab Estate	3,266.49	Certified	N/A	7-Jul-11	19-20 July 2021				
	Malaysia	Chenor Estate	2,834.98	Certified	N/A	7-Jul-11	19-20 July 2021				
	Malaysia	Sg Mai Estate	1,996.99	Certified	N/A	7-Jul-11	19-20 July 2021				
Jabor	Malaysia	Jabor Oil Mill	2,332.92	Certified	N/A	7-Jul-11	19-20 July 2021				
	Malaysia	Jabor Estate	2,332.92	Certified	N/A	7-Jul-11	19-20 July 2021				
Labu	Malaysia	Labu Oil Mill	4,529.72	Certified	N/A	30-Dec-11	19-20 July 2021				
	Malaysia	Labu Estate	4,529.72	Certified	N/A	30-Dec-11	19-20 July 2021				
Tanah Merah	Malaysia	Tanah Merah Oil Mill	6,203.87	Certified	N/A	19-May-10	19-20 July 2021				
	Malaysia	Tanah Merah Estate	4,341.73	Certified	N/A	19-May-10	19-20 July 2021				
	Malaysia	Bukit Pelandok Estate	1,862.14	Certified	N/A	19-May-10	19-20 July 2021				
Sua Betong	Malaysia	Sua Betong Oil Mill	18,457.27	Certified	N/A	18-Feb-14	19-20 July 2021				
	Malaysia	Sua Betong Estate	2,870.75	Certified	N/A	18-Feb-14	19-20 July 2021				

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	Malaysia	Sengkang Estate	2,831.51	Certified	N/A	18-Feb-14	19-20 July 2021				
	Malaysia	Bradwall Estate	3,828.34	Certified	N/A	18-Feb-14	19-20 July 2021				
	Malaysia	PD Lukut Estate	1,523.79	Certified	N/A	18-Feb-14	19-20 July 2021				
	Malaysia	Tampin Linggi Estate	2,106.71	Certified	N/A	18-Feb-14	19-20 July 2021				
	Malaysia	Sg. Bahru Estate	1,427.31	Certified	N/A	18-Feb-14	19-20 July 2021				
	Malaysia	Salak Estate	3,868.86	Certified	N/A	18-Feb-14	19-20 July 2021				
Kok Foh	Malaysia	Kok Foh Oil Mill	14,852.64	Certified	N/A	7-Jul-11	19-20 July 2021				
	Malaysia	Muar River Estate	1,584.62	Certified	N/A	7-Jul-11	19-20 July 2021				
	Malaysia	Sg. Senarut Estate + Sg Gemas Estate	2,958.38	Certified	N/A	7-Jul-11	19-20 July 2021				
	Malaysia	Kok Foh Estate	2,275.84	Certified	N/A	7-Jul-11	19-20 July 2021				
	Malaysia	Bukit Pilah Estate	3,667.31	Certified	N/A	7-Jul-11	19-20 July 2021				
	Malaysia	St. Helier Estate	1,992.65	Certified	N/A	7-Jul-11	19-20 July 2021				
	Malaysia	Sungai Sabaling Estate	1,321.35	Certified	N/A	7-Jul-11	19-20 July 2021				
	Malaysia	Pertang Estate	1,052.49	Certified	N/A	7-Jul-11	19-20 July 2021				
Kempas	Malaysia	Kempas Oil Mill	11,828.51	Certified	N/A	20-May-10	19-20 July 2021				
	Malaysia	Kempas Estate	4,505.45	Certified	N/A	20-May-10	19-20 July 2021				

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	Malaysia	Tangkah Estate	2,537.78	Certified	N/A	20-May-10	19-20 July 2021				
	Malaysia	Kemuning Estate	2,671.05	Certified	N/A	20-May-10	19-20 July 2021				
	Malaysia	Serkam Estate	2,114.23	Certified	N/A	20-May-10	19-20 July 2021				
Diamond Jubilee	Malaysia	Diamond Jubilee Palm Oil Mill	7,356.19	Certified	N/A	5-Oct-11	19-20 July 2021				
	Malaysia	Diamond Jubilee Estate	2,836.19	Certified	N/A	5-Oct-11	19-20 July 2021				
	Malaysia	Bukit Asahan Estate	3,072.18	Certified	N/A	5-Oct-11	19-20 July 2021				
	Malaysia	Welch Estate	1,447.82	Certified	N/A	5-Oct-11	19-20 July 2021				
Pagoh	Malaysia	Pagoh Oil Mill	7,418.59	Certified	N/A	28-Jan-14	19-20 July 2021				
	Malaysia	Pagoh Estate	2,325.93	Certified	N/A	28-Jan-14	19-20 July 2021				
	Malaysia	Lanadron Estate	1,964.44	Certified	N/A	28-Jan-14	19-20 July 2021				
	Malaysia	Pengkalan Bukit Estate	3,128.22	Certified	N/A	28-Jan-14	19-20 July 2021				
Chaah	Malaysia	Chaah Oil Mill	8,699.93	Certified	N/A	18-Nov-10	19-20 July 2021				
	Malaysia	Chaah Estate	2,795.36	Certified	N/A	18-Nov-10	19-20 July 2021				
	Malaysia	Sg. Simpang Kiri Estate	2,371.66	Certified	N/A	18-Nov-10	19-20 July 2021				
	Malaysia	North Labis Estate	3,532.91	Certified	N/A	18-Nov-10	19-20 July 2021				

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Gunung Mas	Malaysia	Gunung Mas Oil Mill	12,305.54	Certified	N/A	19-May-10	19-20 July 2021				
	Malaysia	Gunung Mas Estate	3,466.17	Certified	N/A	19-May-10	19-20 July 2021				
	Malaysia	Kempas Klebang Estate	2,473.06	Certified	N/A	19-May-10	19-20 July 2021				
	Malaysia	Bukit Paloh Estate	3,390.90	Certified	N/A	19-May-10	19-20 July 2021				
	Malaysia	Yong Peng Estate	2,975.41	Certified	N/A	19-May-10	19-20 July 2021				
Bukit Benut	Malaysia	Bukit Benut Oil Mill	8,495.13	Certified	N/A	5-Oct-11	19-20 July 2021				
	Malaysia	Bukit Benut Estate	2,799.78	Certified	N/A	5-Oct-11	19-20 July 2021				
	Malaysia	Lambak Elaeis Estate	3,740.16	Certified	N/A	5-Oct-11	19-20 July 2021				
	Malaysia	CEP Nyior Estate	1,955.19	Certified	N/A	5-Oct-11	19-20 July 2021				
Ulu Remis	Malaysia	Ulu Remis Oil Mill	17,115.58	Certified	N/A	11-Apr-11	19-20 July 2021				
	Malaysia	Ulu Remis Estate	2,598.25	Certified	N/A	11-Apr-11	19-20 July 2021				
	Malaysia	Cenas Estate	1,974.06	Certified	N/A	11-Apr-11	19-20 July 2021				
	Malaysia	Bukit Badak Estate	3,234.25	Certified	N/A	11-Apr-11	19-20 July 2021				
	Malaysia	Tun Dr. Ismail Estate	4,271.44	Certified	N/A	11-Apr-11	19-20 July 2021				
	Malaysia	Pekan Estate	3,258.70	Certified	N/A	11-Apr-11	19-20 July 2021				
	Malaysia	Sembrong Estate	1,778.88	Certified	N/A	11-Apr-11	19-20 July 2021				

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Hadapan	Malaysia	Hadapan Palm Oil Mill	11,371.82	Certified	N/A	29-Mar-11	19-20 July 2021				
	Malaysia	Sri Pulau Estate	2,049.87	Certified	N/A	29-Mar-11	19-20 July 2021				
	Malaysia	Kulai Estate	3,023.42	Certified	N/A	29-Mar-11	19-20 July 2021				
	Malaysia	Layang Estate	3,258.90	Certified	N/A	29-Mar-11	19-20 July 2021				
	Malaysia	CEP Renggam Estate	3,039.63	Certified	N/A	29-Mar-11	19-20 July 2021				
Sandakan Bay	Malaysia	Sandakan Bay Oil Mill	16,764.34	Certified	N/A	1-Oct-08	19-20 July 2021				
	Malaysia	Tun Tan Siew Sin Estate	3,125.60	Certified	N/A	1-Oct-08	19-20 July 2021				
	Malaysia	Tunku Estate	3,199.05	Certified	N/A	1-Oct-08	19-20 July 2021				
	Malaysia	Tigowis Estate	2,074.02	Certified	N/A	1-Oct-08	19-20 July 2021				
	Malaysia	Sentosa Estate	3,545.54	Certified	N/A	1-Oct-08	19-20 July 2021				
	Malaysia	Segaliud Estate	4,820.13	Certified	N/A	1-Oct-08	19-20 July 2021				
Melalap	Malaysia	Melalap Oil Mill	5,246.18	Certified	N/A	21-Jan-11	19-20 July 2021				
	Malaysia	Melalap Estate	2,096.73	Certified	N/A	21-Jan-11	19-20 July 2021				
	Malaysia	Sapong Estate	3,149.45	Certified	N/A	21-Jan-11	19-20 July 2021				
Binuang	Malaysia	Binuang Oil Mill	11,659.58	Certified	N/A	16-Jan-09	19-20 July 2021				
	Malaysia	Binuang Estate	3,271.08	Certified	N/A	16-Jan-09	19-20 July 2021				

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	Malaysia	Sungang Estate	3,407.98	Certified	N/A	16-Jan-09	19-20 July 2021				
	Malaysia	Tingayu Estate	1,881.08	Certified	N/A	16-Jan-09	19-20 July 2021				
	Malaysia	Jeleta Bumi Estate	3,099.44	Certified	N/A	16-Jan-09	19-20 July 2021				
Giram	Malaysia	Giram Oil Mill	8,345.02	Certified	N/A	16-Jan-09	19-20 July 2021				
	Malaysia	Giram Estate	4,166.98	Certified	N/A	16-Jan-09	19-20 July 2021				
	Malaysia	Mostyn Estate	4,178.04	Certified	N/A	16-Jan-09	19-20 July 2021				
Merotai	Malaysia	Merotai Oil Mill	11,545.71	Certified	N/A	16-Jan-09	19-20 July 2021				
	Malaysia	Merotai Estate	3,052.66	Certified	N/A	16-Jan-09	19-20 July 2021				
	Malaysia	Imam Estate	3,773.56	Certified	N/A	16-Jan-09	19-20 July 2021				
	Malaysia	Tiger Estate	2,497.86	Certified	N/A	16-Jan-09	19-20 July 2021				
	Malaysia	Table Estate	2,221.63	Certified	N/A	16-Jan-09	19-20 July 2021				
Layang	Malaysia	Lavang Oil Mill	24,836.54	Certified	N/A	30-Dec-11	19-20 July 2021				
	Malaysia	Lavang Estate	4,363.83	Certified	N/A	30-Dec-11	19-20 July 2021				
	Malaysia	Rasan Estate	3,454.00	Certified	N/A	30-Dec-11	19-20 July 2021				
	Malaysia	Belian Estate	2,847.00	Certified	N/A	30-Dec-11	19-20 July 2021				
	Malaysia	Kelida Estate	2,460.00	Certified	N/A	30-Dec-11	19-20 July 2021				

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	Malaysia	Lavang (Special) Estate	included under Lavang Estate Ha	Certified	N/A	30-Dec-11	19-20 July 2021				
	Malaysia	Pekaka Estate	2,626.14	Certified	N/A	30-Dec-11	19-20 July 2021				
	Malaysia	Ruai Estate	2,460.96	Certified	N/A	30-Dec-11	19-20 July 2021				
	Malaysia	Dulang Estate	2,548.00	Certified	N/A	30-Dec-11	19-20 July 2021				
	Malaysia	Charquest Estate	1,448.71	Certified	N/A	30-Dec-11	19-20 July 2021				
	Malaysia	Paroh Estate	2,627.90	Certified	N/A	30-Dec-11	19-20 July 2021				
Rajawali	Malaysia	Rajawali Oil Mill	14,104.45	Certified	N/A	30-Dec-11	19-20 July 2021				
	Malaysia	Rajawali Estate	6,087.27	Certified	N/A	30-Dec-11	19-20 July 2021				
	Malaysia	Samudera Estate	3,308.60	Certified	N/A	30-Dec-11	19-20 July 2021				
	Malaysia	Semarak Estate	2,248.68	Certified	N/A	30-Dec-11	19-20 July 2021				
	Malaysia	Bayu Estate	2,459.90	Certified	N/A	30-Dec-11	19-20 July 2021				
Derawan	Malaysia	Derawan Oil Mill	9,528.83	Certified	N/A	30-Dec-11	19-20 July 2021				
	Malaysia	Derawan Estate	2,490.79	Certified	N/A	30-Dec-11	19-20 July 2021				
	Malaysia	Sahua Estate	2,644.00	Certified	N/A	30-Dec-11	19-20 July 2021				
	Malaysia	Takau Estate	2,107.00	Certified	N/A	30-Dec-11	19-20 July 2021				
	Malaysia	Damai Estate	2,287.04	Certified	N/A	30-Dec-11	19-20 July 2021				

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Guadalcanal Plains Palm Oil Limited (GPPOL)	Solomon Islands	Tetere Oil Mill	9,025.69	Certified	N/A	18-Mar-11	19-20 July 2021				
	Solomon Islands	Tetere Estate	2,947.79	Certified	N/A	18-Mar-11	19-20 July 2021				
	Solomon Islands	Ngalmibiu Estate	2,498.65	Certified	N/A	18-Mar-11	19-20 July 2021				
	Solomon Islands	Mbalisuna Estate	2,868.47	Certified	N/A	18-Mar-11	19-20 July 2021				
	Solomon Islands	Smallholders – West Zone (83)	245.50	Certified	N/A	18-Mar-11	19-20 July 2021				
	Solomon Islands	Smallholders – Central Zone (53)	181.71	Certified	N/A	18-Mar-11	19-20 July 2021				
	Solomon Islands	Smallholders – MBA East Zone (59)	180.80	Certified	N/A	18-Mar-11	19-20 July 2021				
	Solomon Islands	Smallholders – MBE East Zone (37)	102.77	Certified	N/A	18-Mar-11	19-20 July 2021				
Milne Bay Estates (MBE)	Papua New Guinea	Hagita Oil Mill	16,508.59	Certified	N/A	15-Feb-13	19-20 July 2021				
	Papua New Guinea	Giligili Estate	1,095.47	Certified	N/A	15-Feb-13	19-20 July 2021				
	Papua New Guinea	Hagita Estate	2,450.02	Certified	N/A	15-Feb-13	19-20 July 2021				
	Papua New Guinea	Waigani Estate	2,341.13	Certified	N/A	15-Feb-13	19-20 July 2021				
	Papua New Guinea	Sagarai Estate	2,864.55	Certified	N/A	15-Feb-13	19-20 July 2021				
	Papua New Guinea	Padipadi Estate	4,517.67	Certified	N/A	15-Feb-13	19-20 July 2021				
	Papua New Guinea	Mariawatte Estate	1,680.14	Certified	N/A	15-Feb-13	19-20 July 2021				
	Papua New Guinea	Smallholders - East Gurney Estate (259)	450.59	Certified	N/A	15-Feb-13	19-20 July 2021				

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	Papua New Guinea	Smallholders - West Gurney Estate (231)	479.13	Certified	N/A	15-Feb-13	19-20 July 2021				
	Papua New Guinea	Smallholders - East Sagarai Estate (156)	283.93	Certified	N/A	15-Feb-13	19-20 July 2021				
	Papua New Guinea	Smallholders - West Sagarai Estate (212)	345.96	Certified	N/A	15-Feb-13	19-20 July 2021				
Poliamba (POL)	Papua New Guinea	Poliamba Oil Mill	10,720.53	Certified	N/A	19-Mar-12	19-20 July 2021				
	Papua New Guinea	Kara Estate	1,032.10	Certified	N/A	19-Mar-12	19-20 July 2021				
	Papua New Guinea	Nalik Estate	2,666.75	Certified	N/A	19-Mar-12	19-20 July 2021				
	Papua New Guinea	West Coast Estate	627.60	Certified	N/A	19-Mar-12	19-20 July 2021				
	Papua New Guinea	Noatsi Estate	2,064.10	Certified	N/A	19-Mar-12	19-20 July 2021				
	Papua New Guinea	Madak Estate	1,517.11	Certified	N/A	19-Mar-12	19-20 July 2021				
	Papua New Guinea	Smallholders -North Division (615)	1,022.12	Certified	N/A	19-Mar-12	19-20 July 2021				
	Papua New Guinea	Smallholders- South Division (866)	1,257.21	Certified	N/A	19-Mar-12	19-20 July 2021				
	Papua New Guinea	Smallholders -West Division (309)	533.54	Certified	N/A	19-Mar-12	19-20 July 2021				
Ramu Agricultural Industries Ltd (RAIL)	Papua New Guinea	Gusap Mill	14,606.08	Certified	N/A	5-Aug-10	19-20 July 2021				
	Papua New Guinea	Gusap East (Gusap) Estate	2,856.45	Certified	N/A	5-Aug-10	19-20 July 2021				
	Papua New Guinea	Gusap West (Paddock) Estate	3,019.09	Certified	N/A	5-Aug-10	19-20 July 2021				
	Papua New Guinea	Surinam Estate	2,154.14	Certified	N/A	5-Aug-10	19-20 July 2021				

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	Papua New Guinea	Dumpu Estate	2,254.36	Certified	N/A	5-Aug-10	19-20 July 2021				
	Papua New Guinea	Ngaru Estate	854.33	Certified	N/A	5-Aug-10	19-20 July 2021				
	Papua New Guinea	J Estate (Jephcott) Estate	2,824.01	Certified	N/A	5-Aug-10	19-20 July 2021				
	Papua New Guinea	Smallholders - Madang VOPs (71)	360.00	Certified	N/A	5-Aug-10	19-20 July 2021				
	Papua New Guinea	Smallholders - Morobe VOPs (253)	283.70	Certified	N/A	5-Aug-10	19-20 July 2021				
Higaturu Oil Palm (HOP)	Papua New Guinea	Sangara Oil Mill		Certified	N/A	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Mamba Oil Mill		Certified	N/A	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Embi Estate	1,737.78	Certified	N/A	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Ambogo Estate	2,040.00	Certified	N/A	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Sangara Estate	1,780.00	Certified	N/A	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Sumbiripa Estate	2,545.00	Certified	N/A	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Mamba Estate	4,013.10	Certified	N/A	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Sambogo Estate	2,637.85	Certified	N/A	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Scheme Smallholder Sorovi Division (2019)	3,940.21	Certified	N/A	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Scheme Smallholder Saiho Division (842)	1,493.06	Certified	N/A	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Scheme Smallholder Aeka Division (911)	1,474.23	Certified	N/A	1-Feb-13	19-20 July 2021				

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	Papua New Guinea	Scheme Smallholder Igora Division (1367)	2,940.15	Certified	N/A	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Scheme Smallholder Ilimo Division (671)	1,063.66	Certified	N/A	1-Feb-13	19-20 July 2021				
West New Britain (WNB)	Papua New Guinea	Mosa Oil Mill		Certified	N/A	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Kumbango Oil Mill		Certified	N/A	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Kapiura Mill		Certified	N/A	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Numundo Mill		Certified	N/A	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Waraston Mill		Certified	N/A	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Bebere Estate	2,226.71	Certified	N/A	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Kumbango Estate	2,610.80	Certified	N/A	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Togulo Estate	1,509.20	Certified	N/A	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Dami Estate	1,507.00	Certified	N/A	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Waisisi Estate	1,090.00	Certified	N/A	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Kautu Estate	4,280.60	Certified	N/A	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Karassu Estate	2,387.64	Certified	N/A	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Moroa Estate	848.16	Certified	N/A	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Bilomi Estate	2,011.70	Certified	N/A	10-Sep-08	19-20 July 2021				

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Papua New Guinea	Loata Estate	562.00	Certified	N/A	10-Sep-08	19-20 July 2021				
Papua New Guinea	Haella Estate	4,220.30	Certified	N/A	10-Sep-08	19-20 July 2021				
Papua New Guinea	Garu Estate	3,709.60	Certified	N/A	10-Sep-08	19-20 July 2021				
Papua New Guinea	Daliavu Estate	2,484.10	Certified	N/A	10-Sep-08	19-20 July 2021				
Papua New Guinea	Sapuri Estate	2,180.90	Certified	N/A	10-Sep-08	19-20 July 2021				
Papua New Guinea	Malilimi Estate	3,837.00	Certified	N/A	10-Sep-08	19-20 July 2021				
Papua New Guinea	Rigula Estate	3,720.00	Certified	N/A	10-Sep-08	19-20 July 2021				
Papua New Guinea	Nomundo Estate	2,645.17	Certified	N/A	10-Sep-08	19-20 July 2021				
Papua New Guinea	Navarai / Karato ME /KDC EU Estate	1,103.77	Certified	N/A	10-Sep-08	19-20 July 2021				
Papua New Guinea	Volupai / Lotomgam / Natupi / Goruru Estate	1,992.59	Certified	N/A	10-Sep-08	19-20 July 2021				
Papua New Guinea	Lolokoru Estate	2,453.10	Certified	N/A	10-Sep-08	19-20 July 2021				
Papua New Guinea	Ove Estate	3,541.00	Certified	N/A	10-Sep-08	19-20 July 2021				
Papua New Guinea	Tamare Estate	1,362.70	Certified	N/A	10-Sep-08	19-20 July 2021				
Papua New Guinea	Smallholders LSS Mosa (1822)	5,008.53	Certified	N/A	10-Sep-08	19-20 July 2021				
Papua New Guinea	Smallholders VOP East (1817)	5,324.37	Certified	N/A	10-Sep-08	19-20 July 2021				
Papua New Guinea	Smallholders VOP Central (1964)	5,756.57	Certified	N/A	10-Sep-08	19-20 July 2021				

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	Papua New Guinea	Smallholders VOP West (1279)	2,804.10	Certified	N/A	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Smallholders LSS Kapiura (551)	551.00	Certified	N/A	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Smallholders VOP Kapiura (850)	847.00	Certified	N/A	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Smallholders Kaulong/Akami/Pushiki/Repamira/Sakapei (20)	700.37	Certified	N/A	10-Sep-08	19-20 July 2021				
Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Papua New Guinea	Erap Mill	5,399.40	Certified	N/A	27-Mar-20	19-20 July 2021			There is total area for NPP: 710.30 ha which is currently excluded from the certification scope of MFCL until the NPP is approved.	
	Papua New Guinea	Munum Estate	1,734.57	Certified	N/A	27-Mar-20	19-20 July 2021				
	Papua New Guinea	Maralumi Estate	2,427.15	Certified	N/A	27-Mar-20	19-20 July 2021				
	Papua New Guinea	Erap Estate	1,237.68	Certified	N/A	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 five (5) Critical; five (5) Minor nonconformities and one (1) Opportunity For Improvement raised. The Strategic Operating Unit (SOU 16) - Kok Foh 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 #	2499036-202405-M1	Issued Date	24/05/2024
Due Date	22/08/2024	Closure Date	15/08/2024
Indicator & Category (Critical / Minor)	2.1.1 – Critical		
Statement of Nonconformity:	Compliance with legal requirements were not effectively demonstrated.		
Requirement Reference:	The Unit of Certification complies with legal requirements.		
Objective Evidence:	<p>No valid water abstraction license obtained from BAKAJ for Sg Gemas Division (under Sg Senarut estate). ii) There was no valid license from SPAN for the operation of Private Water Supply System, Water Distribution and Water Treatment at Sg Gemas Division (under Sg Senarut estate).</p> <p><u>Kok Foh POM</u></p> <ul style="list-style-type: none"> i) Based on site visit at anaerobic pond no.2 & 3, freeboard sighted less than 0.5 meter as stipulated in the mill's compliance schedule. ii) ii) 2 electrical charginman (A4) have not yet registered under Kok Foh POM and maintained valid license as competent A4 charginman <p>Normative reference:</p> <ul style="list-style-type: none"> i) Peraturan-Peraturan Abstraksi Air (Johor) 2014 ii) Peraturan-Peraturan Industri Perkhidmatan Air (Perlesenan) 2007 iii) License no. 006013, compliance schedule, clause no. 13 iv) Electricity Regulations 1994 (Regulation 83) 		
Corrections:	<p>Sg Senarut Estate</p> <ul style="list-style-type: none"> i) To reinitiate communication with BAKAJ and SPAN on the process of renewal license of water extraction and treatment. ii) To consult and follow up with EMS (Engineering and Mill Services) and land department to resolve the issue with BAKAJ & SPAN. <p>Kok Foh POM</p> <ul style="list-style-type: none"> i) Expedite bund raise up and desludging progress ii) Clear chokage in temporary bypass pipe due to desludging programme iii) Nagarajan currently being registered for A4 exams, awaiting confirmation 		

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	from ST due to exams were conducted once a year. Register Hazlieman in ST as competent A4 registered under Kok Foh Palm Oil Mill
Root Cause Analysis:	<p>Sg Senarut Estate</p> <p>i) Lack of review and update of the list of legal licenses/permit especially against water abstraction requirement in ensuring compliance.</p> <p>Kok Foh POM</p> <p>i) Ineffective method used for freeboard identifications</p> <p>ii) Chokage was observed in bypass pipe due to high solid built up</p> <p>iii) No monitoring of validity of license for competent persons by the management where Nagarajan registered under A4 Terhad which has been obsolete by ST and have been in progress for Full A4 competency (Attended 3 times, failed 3 times). Hazlieman was newly recruited (1 month), mill management has yet to engaged for registration in ST website</p>
Corrective Actions:	<p>Sg Senarut Estate</p> <p>i) Review and update list of licenses/permit required for water abstraction and other operations</p> <p>ii) To include this matter as an agenda in Management Meeting quarterly until the issue is resolved to ensure that there is a continuity in the follow up even if there is a change in management in future.</p> <p>Kok Foh POM</p> <p>i) Install freeboard ruler based on colour code in all ETP pond for efficient monitoring.</p> <p>ii) PIC update on daily basis on freeboard reading for any potential chokage which will be reported and attended immediately</p> <p>iii) Appoint dedicated PIC for monitoring of the validity of the license of competent persons in ensuring compliances</p> <p>iv) Mill management to monitor Nagarajan exams progress and process for registration once passed examination</p> <p>Major NC close out verification:</p> <p>i) BAKAJ license approval has been obtained, license no. 07/A/Sgt/002 valid until 31/12/2024.</p> <p>ii) Summary of license for 2024 has been updated and include BAKAJ and SPAN license status as part of monitoring dashboard. Related communication with the relevant department/authority/agency was verified as to expedite the process of obtaining the license from SPAN</p> <p>iii) OSH meeting dated 10/6/24 has included the discussion on license requirement as part of the review and follow-up process.</p> <p>iv) Bund heightening and complete with piling work has been completed together with desludging of anaerobic pond no.2 & 3 and verified during onsite verification. No chokages of pipe and overflow observed. Freeboard ruler has been installed with color code to indicate high @ < 0.5 m(red) and low > 0.5 m level. Daily update via whatsapp to inform the management team on the status of freeboard on the anaerobic ponds.</p> <p>v) A4 charge man ST registration completed. Refer to letter from ST, ref: ST(MLK)L/NS/00084 dated 9/8/2024 was verified and valid until 28/5/2026. The other competent person registration will be done once qualified after the examination.</p> <p>vi) Kok Foh POM's QA has been appointed as person in charge to monitor validity</p>

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	of competent person license to ensure compliance. Refer to letter dated 20/06/24 endorsed by the mill manager.
Assessment Conclusion:	The major NC was closed effectively with sufficient evidence of implementation on 15/08/2024. Continuous implementation will be further verified in the next assessment.

Non-conformity			
NCR Ref #	2499036-202405-M2	Issued Date	24/05/2024
Due Date	22/08/2024	Closure Date	15/08/2024
Indicator & Category (Critical / Minor)	3.8.7 – Critical		
Statement of Nonconformity:	Mechanism on handling of non-conforming documents was not effectively implemented.		
Requirement Reference:	Purchasing and Goods In iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.		
Objective Evidence:	Non-conforming documents were recorded from Sg Senarut Estate FFB delivery note no.: 29759(1/1/24), 3116 (4/3/24), 3046 (2/2/2024) and 481 (1/4/24) which stated wrong/obsolete RSPO certificate number of previous CB.		
Corrections:	Communicate and verify at mill weighbridge with Sg Senarut Estates for immediate correction on removing old RSPO cert number.		
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Insufficient verification from involved mill parties regarding consignment note requirement for RSPO SCCS 2. Insufficient communication on RSPO Supply Chain requirement to Estate operations. 		
Corrective Actions:	<p>i) Conduct training regarding RSPO SCCS requirements with estates management team (RSPO SCCS Requirement including verification of RSPO certificate)</p> <p>ii) Verification of consignment note by Mill dedicated personnel/at the weighbridge in ensuring the necessary information are captured correctly. Group Sustainability Department will send out a reminder to all Upstream operation on Supply Chain requirement (certification information on delivery documents) and reminder for the affected Units where there is an update to their RSPO Certification Number</p> <p>Major NC close out verification:</p> <p>i) Communication with estate team (Sg Senarut) was verified via email on 21/5/2024 to inform the obsolete certificate information used in the weighbridge ticket. Effective starting from 22/5/2024, the obsolete certificate information has to be removed and corrected with the latest certificate information.</p> <p>ii) Training and briefing on the RSPO SCCS requirements was carried out on 15/07/2024 for SOU16 team. An IOM briefing was also done by RHSE on RSPO SCCS requirements particularly on the certification information in the weighbridge ticket.</p> <p>iii) Verification of latest WB ticket dated 8/8/24 for both Sg Gemas Division and Sg Senarut main division has confirmed the correct information has been validated before receiving the FFB.</p>		

Assessment Conclusion:	The major NC was closed effectively with sufficient evidence of implementation on 15/08/2024. Continuous implementation will be further verified in the next assessment.
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Non-conformity			
NCR Ref #	2499036-202405-M3	Issued Date	24/05/2024
Due Date	22/08/2024	Closure Date	15/08/2024
Indicator & Category (Critical / Minor)	6.2.4 – Critical		
Statement of Nonconformity:	Workers minimum standard of housing and amenities Act 1990 (Act 446) was not effectively demonstrated.		
Requirement Reference:	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.		
Objective Evidence:	<p><u>Sungei Senarut Estate</u></p> <p>1. Worker’s housing inspection was done by hospital assistant (HA) on weekly basis and latest inspection carried out on 07/05/2024 and 14/05/2024 where it has identified delayed of grass cutting in both inspections. Verified during site visit on 23/05/2024, the issue has not yet rectified and still pending.</p> <p>2. Observed during site visit, sighted clogged collection drain which resulting from waste generated from the workers housing basin. This issue has not been identified in the latest line site inspection. This is against the requirement in the Section 23 (1)(b) It shall be the duty of the employer of a place of employment where employees and their dependents are provided with housing accommodation to ensure that— the perimeter drains around each dwelling or block of dwellings including all outlet drains are kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water.</p>		
Corrections:	Estate Management immediately reviewed PIOA inspection report. Line site grass cutting was completed on 24 May 2024 and clogged drain was cleared on the same day.		
Root Cause Analysis:	In both cases, the incidences happened due to Person In Charge of Accommodation (PIOA) i.e. Medical Assistant inspection was not reviewed by Estate Management timely as the appointed Executive in charge was away from duty and no replacement identified. Moreover, PIOA alone is not sufficient to cover all divisions inspections as there are 2 areas i.e. Sg Senarut (main) & Sg Gemas (division).		
Corrective Actions:	<p>i) PIOA report to be reviewed and updated on a weekly basis by Executive in Charge and verified on a monthly basis by Manager.</p> <p>ii) Verification and evidence of work completed to be uploaded in the communication platform e.g. whatsapp group between PIOA & Management.</p> <p>iii) To appoint another PIOA to assist the existing PIOA to complete housing</p>		

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	<p>inspection effectively.</p> <p>Major NC close out verification:</p> <p>i) Verified the PIOA for both Sg Gemas Division and Sg Senarut estate for July 2024. The report has checked by executive in charge on weekly basis and on monthly basis by estate manager.</p> <p>ii) Verification and evidence of work completed updated via whatsapp as to verify the status of completion and any problem reported in the PIOA.</p> <p>iii) Another PIOA in charge appointed for Sg Gemas Division. Appointment letter dated 10/06/2024 was sighted and signed by estate manager.</p> <p>iv) Site visit made to house no.189 - 2 person per house (foreign workers). The grass cutting carried out promptly and evident during visit. The grass cutting task has two rounds (1st week, 3rd week) of the month. The parameter drain system and collection drain is working without any clogged and unpleasant odors.</p>
Assessment Conclusion:	The major NC was closed effectively with sufficient evidence of implementation on 15/08/2024. Continuous implementation will be further verified in the next assessment

Non-conformity			
NCR Ref #	2499036-202405-M4	Issued Date	24/05/2024
Due Date	22/08/2024	Closure Date	15/08/2024
Indicator & Category (Critical / Minor)	3.6.1 – Critical		
Statement of Nonconformity:	Mitigation controls for LOTO and chemical management procedures was not effectively implemented.		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<p><u>Kok Foh POM</u></p> <p>Site visit at Switch Board Boiler Station, it was found that the process of energy isolation of boiler 1 cables were not according with Lock Out And Tag Out (LOTO) Procedures (SDB/SDH/GSQM/ESH/305) Section 6.2 (c) Disconnected the energy source, (d) apply LOTO Devices, (e) Control Stored Energy, (f) Verify isolation of equipment.</p> <p><u>Kok Foh POM</u></p> <p>During site visit at Ramp Area, 1 bag of Chemical Soda Ash stored in the tools locker. In addition, there was no SDS available at site. This was not in line with Chemical Safety Management Procedures (UM/HSE/OCP/04) section 6.4 Storage of chemicals and 6.5 Handling of chemicals.</p>		
Corrections:	<p>i) Conduct proper isolation and barricade the area with signages indicating "No Entry", "Cable Not Energized" and "Authorized Personnel Only" to limit entry</p> <p>ii) Immediately store soda ash in chemical store and issue out once confirmation for ramp floor cleaning job has been obtained. The SDS is already displayed in the store.</p>		

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Root Cause Analysis:	<p>i) LOTO Procedures were not fully implemented in the case where there was no energy sources that was present in the cables and there was no inspection checklist for electrical equipment.</p> <p>ii) Limitation in terms of accessibility to current chemical store due to its location is far from mill processing area</p>
Corrective Actions:	<p>i) Chargeman and OSH-C to verify and assess proper isolation had been done to the cable</p> <p>ii) Training and implementation of "Chargeman Monthly Inspection Checklist" as per IOM-CEOUM-HSE-010-04-2024 effective 15th June 2024</p> <p>iii) Construct an additional chemical storage area near fruit handling station for better accessibility (near ramp station) from chemical store complete with signage, spill kit, SDS, portable eye wash, bund and inventory checklist.</p> <p>Major NC close out:</p> <p>i) A photographic evidence of proper energy isolation process was verified. Related LOTO/energy isolation method and signage applied while doing any process of energy isolation.</p> <p>ii) Soda Ash has been cleared and sent back to chemical store for proper storage. A new temporary storage constructed near fruit handling station complete with signage, spill kit, SDS, portable eye wash, bund and inventory checklist.</p> <p>iii) Chargeman and OSH-C has verified and assess a proper energy isolation process using charge man monthly checklist. Inspection records for June - August 2024 was verified.</p> <p>iv) Training and implementation of "Chargeman Monthly Inspection Checklist" as per IOM-CEOUM-HSE-010-04-2024 effective 15th June 2024 was verified. The training was carried on 9/8/2024 and attended by electrical charge man, workshop team and process team.</p>
Assessment Conclusion:	The major NC was closed effectively with sufficient evidence of implementation on 15/08/2024. Continuous implementation will be further verified in the next assessment.

Non-conformity			
NCR Ref #	2499036-202405-M5	Issued Date	24/05/2024
Due Date	22/08/2024	Closure Date	15/08/2024
Indicator & Category (Critical / Minor)	7.2.7 – Critical		
Statement of Nonconformity:	Storage of chemicals were not accordance with procedures.		
Requirement Reference:	Storage of all pesticides is in accordance with recognised best practices.		
Objective Evidence:	<p><u>Sg Sabaling Estate</u></p> <ul style="list-style-type: none"> During inspection at Chemical Store, it was found that no SDS available for 3 chemicals namely; Chemical Rainbow, Acosta and Antracol. SDS for Chemical Rogor and Thiram only available in English Language and not in bi-lingual (English and Bahasa) 		

	<ul style="list-style-type: none"> There were 2 chemical containers; 20 liter and 1 liter containers filled with chemical without any labels. <p>This was not in line with Chemical Safety Management (UM/HSE/OCP/04) with Section 6.3.1 Chemicals supplied shall be classified, packed and labelled in accordance with national or international regulatory requirements such as classification, labelling and safety data sheet of hazardous chemicals regulations 2013 and pesticide (Labelling) Regulations 1984 and Section 6.3 (a) Chemical supplied shall be furnished with a complete and updated SDS. SDS shall be in English and accepted national language.</p>
Corrections:	<p>i) The SDS for 3 chemicals namely; Chemical Rainbow, Acosta and Antracol has been displayed at the chemical store.</p> <p>ii) SDS for Chemical Rogor and Thiram has been printed for bilingual and has been displayed at the chemical store.</p> <p>iii) The containers without label have been re-labeled with the chemical name and hazard sign to indicate the type of chemical</p>
Root Cause Analysis:	<p>i) All document related to NC available at office but not been displayed at chemical store due to there is no specific staff appointed to manage the chemical store. The administration part of the chemical handling i.e. Purchasing, inventory etc. is currently done by second clerk while the management store is temporarily oversaw by workshop attendant. The workshop attendant lacks training on chemical handling management.</p> <p>ii) WPI which was done quarterly was not effective</p>
Corrective Actions:	<p>i) To provide training for storekeeper on chemical safety management.</p> <p>ii) To carry out monthly checklist on chemical safety management beside of current WPI checklist. Which verified by assistant and Manager to avoid such matter repeated.</p> <p>Major NC close out verification:</p> <p>i) SDS in bilingual was made available and displayed at the chemical store for all chemical namely Rainbow, Acosta, Antracol, Rogor and Thiram.</p> <p>ii) Chemical container will no label has been re-labelled with the chemical name and hazard sign for Monex and Rogor.</p> <p>iii) Training on chemical safety management was carried out on 15/7/2024 for workshop/store and nursery personnel.</p> <p>iv) Monthly chemical store inspection records for June - August 2024 was verified. No non-compliance issue reported in the checklist.</p>
Assessment Conclusion:	The major NC was closed effectively with sufficient evidence of implementation on 15/08/2024. Continuous implementation will be further verified in the next assessment

Non-conformity			
NCR Ref #	2499036-202405-N1	Issued Date	24/05/2024
Due Date	Next Assessment	Closure Date	"Open"
Indicator & Category (Critical / Minor)	7.3.2 – Minor		

Statement of Nonconformity:	Disposal of waste material was not effectively demonstrated.
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.
Objective Evidence:	Sg Sabaling Estate At new land preparation area (rubber OP conversion) near to field 04A, an illegal waste dumping containing household waste mixed with scheduled waste (empty hydraulic/chemical/agriculture inputs waste were evident. The estate currently has no landfill and all domestic/household waste disposed to approved government landfill site.
Corrections:	i)Waste has been segregated. Scheduled waste has been placed at the scheduled waste store. Domestic waste has been disposed by the contractor assigned for disposal of domestic waste. ii) Schedule waste placed in the store has been updated in e-swis.
Root Cause Analysis:	1. Nursery & chemical container waste The nursery mandore who was a foreign worker misunderstood the instruction from Management which resulted in nursery wastes being dumped in culling pit outside the nursery area and chemical container not sent to SW store. 2. Hydraulic waste Waste was thrown by wood extraction contractor due to lack of monitoring by Estate Management. WPI did not include wood extraction area.
Corrective Actions:	i) Provide training on chemical handing, scheduled waste and domestic waster to the nursery personnel. ii) Provide proper training on culling procedure and disposal of culled material. iii) Close the existing culling pit which is 250 meters from the nursery. The new culling pit will be constructed within the vicinity of the nursery for better visibility and to ensure no domestic or scheduled waste is thrown into it. iv) To include wood extraction area in the current WPI list and to perform the assessment on a monthly basis for effective monitoring until the completion of the activity.
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Non-conformity			
NCR Ref #	2499036-202405-N2	Issued Date	24/05/2024
Due Date	Next Assessment	Closure Date	"Open"
Indicator & Category (Critical / Minor)	3.4.2 – Minor		
Statement of Nonconformity:	Environmental aspect impact (EAI) and environmental management plan was not effectively developed.		
Requirement Reference:	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.		

Objective Evidence:	EAI dated 17/4/2024 for Kok Foh POM's effluent has yet to include all possible environment aspect (normal, abnormal and emergency) and related management plan to mitigate the impact to environment.
Corrections:	Establish EAI and EIE for both desludging and bund reparation activities
Root Cause Analysis:	Insufficient awareness and requirements of EAI/EIE for abnormal and emergency situations (Desludging and Bund reparation).
Corrective Actions:	i) To review the EAI/EIE with Regional Health, Safety & Environment (RHSE) for sufficiency of EIE/EIA requirements annually including for abnormal and emergency situations ii) Review changes of EIE/EIA during EPMC meeting iii) Training and briefing regarding EAI/EIE requirements in Environmental Management Plan
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Non-conformity			
NCR Ref #	2499036-202405-N3	Issued Date	24/05/2024
Due Date	Next Assessment	Closure Date	"Open"
Indicator & Category (Critical / Minor)	3.3.2 – Minor		
Statement of Nonconformity:	Implementation of the SOPs has not been properly monitored.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<p><u>Pertang Estate</u></p> <ol style="list-style-type: none"> The management has established guideline for workers to keep dogs in the housing complex and documented in the "Garis Panduan permohonan anjing dan syarat-syarat pemeliharaan anjing di dalam kawan Ladang Pertang dated 16/04/2024 which stated that all dogs need to be vaccinated to avoid Rabies diseases according to Seksyen 42, Ordinan Haiwan 1953, and vaccination card need to be show during inspections. Site visit to one of the worker's houses that keep dogs found out that the dog has not been vaccinated yet. <p><u>Kok Foh POM</u></p> <ol style="list-style-type: none"> Stated in the Social dialogue toolkit that 2 workers representative need to be elected from each nationality to represent during the social dialogue. Sighted an email from Mohd Syazwan Hafizh, Social Welfare Services dated 25/10/2023 mentioning that the operating units can appoint only 1 workers representative for workers with same nationalities that less than 10. 1WR to 10 workers. Sample has been taken for Indonesian workers representative where there is only 1 workers representative has been appointed even there is 13 Indonesian workers in the POM. 		
Corrections:	Pertang Estate Withdraw the current SOP/ Guideline and look into other options to address the issue		

	Kok Foh POM Immediately communicate (22 May 2024) with RSS (Regional Support Service) team to conduct election to appoint additional worker representative.
Root Cause Analysis:	Pertang Estate Guideline for workers to keep dogs in the housing complex was issued hastily by OU management without reviewing/assessing the practicality of the Guideline implementation guided by the relevant Group Procedures. Kok Foh POM Misunderstanding of latest Social Dialogue Toolkit requirements by the management specifically on this section
Corrective Actions:	Pertang Estate i) Guideline management (including issuance) shall be guided by Group Policy Instrument Framework (PIF). ii) Continuous awareness via morning muster/ social dialogue and monitoring to be made ensuring the issue is under control. Kok Foh POM i) Request for SWS Toolkit refresher briefing regarding requirements of Social Dialogue activities ii) Executive-In-Charge (EIC) to monitor every addition/reduction in foreign workers numbers in OU and liaise with RSS should election is required in future.
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Non-conformity			
NCR Ref #	2499036-202405-N4	Issued Date	24/05/2024
Due Date	Next Assessment	Closure Date	"Open"
Indicator & Category (Critical / Minor)	2.2.2 – Minor		
Statement of Nonconformity:	Mechanism to monitor compliance legal requirement not effectively implemented.		
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
Objective Evidence:	Kok Foh POM Sample of contractor has been taken for canteen operator which is TXXXXXXX BZ Enterprise where the contractors hired 3 workers for food handling. Sighted the typhoid vaccination records for each worker found out there is gap between the date joined and the vaccination date.		
		Joined Date	Typhoid Injection Date
	Workers A	01/02/2024	06/05/2024
	Workers B	15/04/2024	05/05/2024

	Further verification has been done with Majlis Daerah Jempol, she mentioned that the workers without typhoid injection prohibited to work in the food handling premises. Base on the payslips found out that both are working during the GAP period. This is not in line with Food Hygiene Regulations 2009 clause 31; Medical examination and health condition of food handler 31. (1) A food handler shall be medically examined and vaccinated by a registered medical practitioner Sample of workers` permit checked for canteen operator and found that SOCSO contribution has not been correctly calculated based on to Employees` social security act 1969 (Act 4) Month: April Total salary: RM580.00 Total employee contribution as per pay slip: RM10.15 Total contribution as "Borang 8A" form: RM7.25 As per SOCSO schedule: RM2.25
Corrections:	Typhoid vaccination was obtained on 5 & 6 May 2024 respectively. Vaccine certification has been submitted.
Root Cause Analysis:	Verification of typhoid vaccination was not verified in CVM monitoring prior to commencement of work.
Corrective Actions:	New workers registration to be submitted to mill management under CVM for monthly monitoring. To update existing contract agreement to comply with Food Hygiene Regulations 2009 clause 31; Medical examination and health condition of food handler 31. (1).
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Non-conformity			
NCR Ref #	2499036-202405-N5	Issued Date	24/05/2024
Due Date	Next Assessment	Closure Date	"Open"
Indicator & Category (Critical / Minor)	6.7.2 – Minor		
Statement of Nonconformity:	First Aid box procedures was not fully implemented.		
Requirement Reference:	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.		
Objective Evidence:	<u>Sg Senarut Estate</u> During site inspection at P21A Scout Harvesting operation, the first aid box was not available. Based on interview with the mandore and explained he has attended the First Aid training but yet to receive the First Aid box. This was not in line with First Aid in Workplace Procedures Section 7.1.2 For estate operation the additional travel first aid kit is advisable to bring along by the appointed First Aider / PIC to the field or worksite such as mandora, field supervisor etc.		

	<p><u>Pertang Estate</u></p> <p>During site inspection at P15 A harvesting area, 1 item (Triangular bandage) from the first aid box has expired on 19/11/2022. The latest Inspection was done in May 2024 however did not identify the item which require to be replenished. It was not in line with First Aid in Workplace Procedures Section 7.3.3 It is essential that first aid boxes be checked frequently so as to make sure they are fully equipped, no expired product and all items are usable.</p>
Corrections:	The first aid kit was issued on the 23 rd May 2024 to the head gang
Root Cause Analysis:	There was no identification of first aid box in the list of first aid box requirement for non-routine activities eg Scout Harvesting in line with the First Aid in Workplace Procedures
Corrective Actions:	<p>i) Identification of all routine and non-routine tasks/activities within the OU in accordance to the First Aid in Workplace SOP</p> <p>ii) Update and map the listing of first aid box to include number of first aid box required and the first aider for the respective activities (for routine and non-routine activities)</p> <p>iii) Continuous monitoring through discussion in OSH meeting and Social Dialogues</p>
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>2499036-202405-I1</p> <p><u>Indicator 3.4.2</u></p> <p>As per interview with 1 of the workshop workers, he mentioned that he will be repatriated in June 2024 since he failed that medical checkup (FOMEMA), however he asked if there is possibilities for him to continue work. Sighted in the medical checkup report code: xxxxx07 that the worker has been examined with Filariasis diseases. Interview with an officer from Jabatan Imigresen Daerah Jempol, he mentioned that appeal of the medical checkup result can be done for the medical check-up results through the FOMEMA panel clinic. A phone call made to Sentral Clinic, FOMEMA panel clinic and mentioned that appeal has to follow standard operating procedures (SOP) of the appeal process. where it is prohibited to appeal As for Filariasis diseases, this can be further improved by the management to review the FOMEMA medical checkup report and take necessary action to control since the Filariasis diseases classified as infectious diseases.</p>

Positive Findings	
PF #	Description
PF 1	Good cooperation given by operating unit's team and GSD from HQ during audit
PF 2	No unresolved issue/dispute so far highlighted by internal and external stakeholders as verified during onsite stakeholder meeting

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3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	N/A	Issued Date	
Due Date		Closure Date	
Indicator & Category (Critical / Minor)			
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			
Effectiveness Closure (for previous audit closed Critical NC):			

Previous Audit Minor Non-conformity			
NCR Ref #	N/A	Issued Date	
Due Date		Closure Date	
Indicator & Category (Critical / Minor)			
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			

Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	OFI Statement:

	<p><u>J1/RSPO/OFI/01</u></p> <p>2.1.1: Employees' Minimum Standards of Housing, Accommodations and Amenities Act 1990 – Act 446. Duties and responsibilities in respect of safety and health (24J) (b) to take necessary preventive measures to ensure employees' safety and well-being;</p> <p>During site visit to line site, sighted there are a few houses (local) been extended. Verification with Operating Unit there is no written agreement between the Estate management and the house occupants. Please consider on the potential safety hazards of the extensions and who should be accountable if any unintended incidents happen that may cause bodily injuries.</p> <p>Verification / Follow-up actions:</p> <p>As per verification by auditor through site visit at the housing complex, there is no extension has been made which required written agreement between the estate management and the house occupant.</p>
OFI 2	<p>OFI Statement:</p> <p><u>J1/RSPO/OFI/02</u></p> <p>2.1.1: At Bukit Pilah Estate sited the nursery is in operation, however found the MPOB license for nursery is yet to obtain. Since the application already initiated (31/03/23), therefore this will be raised as concern for the next audit verification</p> <p>Verification / Follow-up actions:</p> <p>The license has been obtained by the operating unit. Refer to MPOB license no. 622112011000, valid from 5/08/2023 to 21/08/2024.</p>
OFI 3	<p>OFI Statement:</p> <p><u>J1/RSPO/OFI/03</u></p> <p>2.1.1: During site visit to Schedule waste store observed that storekeepers have not well understood the requirement of schedule waste labelling as following reasons. At Kok Foh Mill waste store SW 306 spent lubricant oil label shows date of generation as 06/09/2022 but in actual fact based on the bin card it is 15/05/2023. At St. Helier Schedule waste store some of the empty chemical containers are labelled as SW 305 instead of SW 409 Disposed containers</p> <p>Verification / Follow-up actions:</p> <p>No recurrence of issues related to scheduled waste management observed at all visited operating units.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
J1/RSPO/MINOR/01	Minor	7.3.2	26/05/2022	Closed on 26/05/2023
2499036-202405-M1	Critical	2.1.1	24/05/2024	Closed on 15/08/2024
2499036-202405-M2	Critical	3.8.7	24/05/2024	Closed on 15/08/2024
2499036-202405-M3	Critical	6.2.4	24/05/2024	Closed on 15/08/2024
2499036-202405-M4	Critical	3.6.1	24/05/2024	Closed on 15/08/2024
2499036-202405-M5	Critical	7.2.7	24/05/2024	Closed on 15/08/2024
2499036-202405-N1	Minor	7.3.2	24/05/2024	"Open"

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2499036-202405-N2	Minor	3.4.2	24/05/2024	"Open"
2499036-202405-N3	Minor	3.3.2	24/05/2024	"Open"
2499036-202405-N4	Minor	2.2.2	24/05/2024	"Open"
2499036-202405-N5	Minor	6.7.2	24/05/2024	"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 Sime Darby - Kok Foh 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. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as below.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Contractor (Sundry shop)	Loo Tang Kai	Face to face
Contractor (Kok Foh Estate canteen)	Nur Hidayu binti Kamaruddin	Face to face
Neighbouring estate	M.Nazmi bin Othman, Batang Jelai Estate, KLK Plantations	Face to face
Neighbouring estate	S. Viganish, Cheng Wing Chan Estate	Face to face
Union	F.Robert, Negeri Sembilan NUPW representative	Face to face
Government agencies	Abdullah Mustafa, Jabatan Alan Sekitar Kuala Pilah	Face to face
Contractor (Kok Foh Estate canteen)	Siti Zaiton Mahmud, Tiaradamia BZ Enterprise	Face to face
Government agencies	Amira Izzati Mohammad, Majlis Perbandaran Jempol	Phone call
Local communities	Ayof bin Ekal, Kampung Parit Gong	Face to face
Local communities	Esa bin Meswon, Kampung Paya Lang 1	Face to face

Contractor	Thanabalan A/L Hunalan, RSKP Brothers	Face to face
Government agencies	Roslan bin Abu, Immigration Department Jempol	Phone call

Stakeholders comment	
1	<p>Feedbacks: Txxxxxxxxx A/L Hxxxxxx ,Rxxx Bxxxxxxxx</p> <p>Interview has been conducted with Mr Txxxxxxxxx A/L Hxxxxxx as he provided hiring machineries (JCB) to Sungei Senarut Estate since 2021 and he mentioned that there is no issues of payment and he has been invited to stakeholders consultations. He also aware the PIC for communication and consultation if there is any issues raised.</p> <p>He raised concern that he has been instructed to stop work due to some documentation issues since 09/05/2024. He hopes that the issues will be resolved immediately since currently he is paying the workers without any jobs.</p> <p>Audit Team verification and response: Verification has been done by auditor through interview with the management and documentation, where there is Stop work order has been issued to the contractor on 09/05/2024 due to documentation problem and documentation has been submitted by the contractors on 16/05/2024, however there is some issues for JCB operator permit which stated for construction. The management contacted with the other supporting department to clarify the issues for further actions.</p>
2	<p>Feedbacks: Sxxx Zxxxxx Mxxxxxx, Txxxxxxxx Bx Exxxxxx</p> <p>Txxxxxxxx Bx Exxxxxx operate Kok Foh POM canteen since 2022 where there are 3 workers has been recruited. As per interview, tendering process has been done where all potential contractors have been appointed and submit document required and quotations. She mentioned that all workers has been submitted for food handling courses and typhoid injections. All workers has been paid as per minimum wages and contribution of EPF and SOCSO has been done accordingly.</p> <p>Audit Team verification and response: Verification has been done by auditor on typhoid vaccination records and food handling training. Sighted that all food handler has attended the food handling training, however, there is GAP between the previous vaccination and current vaccinations. Details in indicator 2.2.2</p>
3	<p>Feedbacks: Ayof bin Ekal, Kampung Parit Gong and Esa bin Meswon, Kampung Paya Lang 1</p> <p>Ayof bin Ekal is the Tok Batin for Kampung Parit Gong and retired teacher and while for Esa bin Meswon is the village head for Kampung Paya Lang 1 which is retired Kampung Paya Lang 1. Both agreed where there is no customary right land and any issues with regards to land dispute has been raised. Contribution has been received upon request where previously village has been assisted for grass cutting, machineries and manpower. They also has been invited during stakeholders meeting and aware with the communication mechanism.</p> <p>Audit Team verification and response: No further verification required.</p>
4	<p>Feedbacks: M.Nazmi bin Othman, Batang Jelai Estate, KLK Plantations and S. Viganish, Cheng Wing Chan Estate</p> <p>Both are the neighbouring estate for Kok Foh Estate, which mentioned that they have maintained good relationship with the management of Kok Foh Estate and Kok Foh POM. Both representative mentioned that the boundaries has been clearly demarcated where perimeter drain has been constructed and poles has been place is signed. There is no issues of land and there is no signal of intrusion. They mentioned if there is any land issues, they will directly contact with the OU head. They also can demonstrate their understanding on the communication and consultation procedure.</p>

	Audit Team verification and response: No further verification required.
5	<p>Feedbacks: Amira Izzati Mohammad, Majlis Perbandaran Jempol</p> <p>Majlis Perbandaran Jempol has been contacted to have understanding on the requirement as food handler. Ms Amira Izzati mentioned that all food handlers need to attend food handling courses and to have typhoid injection. Ms Amira also mentioned all food handler need to ensure that there no gap between the next vaccination and if there is gap, food handlers need to stop work until next vaccination.</p>
	Audit Team verification and response: No further verification required.
6	<p>Feedbacks: F.Robert, Negeri Sembilan NUPW representative</p> <p>Mr Robert is the representative for NUPW in Negeri Sembilan and he mentioned as the day of audit, there is no dispute has been raised through NUPW which related to all operating units under SOU 16- Kok Foh POM. He also mentioned that Sime Darby Plantations did not prohibit for all workers to join any union. It can be prove through membership registration for workers for all operating units</p>
	Audit Team verification and response: No further verification required.
7	<p>Feedbacks: Loo Tang Kai and Nur Hidayu binti Kamaruddin (sundry shop and canteen at Kok Foh Estate)</p> <p>As per interview during the site visit, it has been confirmed that both has signed COBC as part of commitment to compliance of legal requirement and no hiring force labour, child labour and trafficked labour. Tendering process has been done on annual basis where both of them need to submit their pricing. They also mentioned that they are aware their responsibilities as a renter.</p>
	Audit Team verification and response: No further verification required.
8	<p>Feedbacks: Abdullah Mustafa, Jabatan Alam Sekitar Kuala Pilah</p> <p>As per interview, he mentioned that he has been serving for Jabatan Alam Sekitar Kuala Pilah for more than 10 years and SOU 16- Kok Foh POM and other estates is under his responsibilities. He mentioned that Jabatan Alam Sekitar has yet to receive any complaint from any stakeholders regards to all operating units related to environment from the plantation operations. He also mentioned that each operating unit gives full commitment on the compliance to any legal requirement related.</p>
	Audit Team verification and response: No further verification required.

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 estates have undergone first cycle of replanting.					

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 (SOU 16) - Kok Foh 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 (SOU 16) - Kok Foh Oil Millis remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidhir Bin Zainal Abidin	Name: Shylaja Devi Vasudevan Nair
Company Name: BSI Services (M) Sdn Bhd	Company Name: SD Guthrie Bhd
Title: Lead Auditor	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: 15th August 2024	Date: 20/08/2024

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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	(C) Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance -	There is evidence that all documents that has been specified in the RSPO P&C has been made available to public. It has been verified based on the management systems that has been established through procedure which each operating units need to respond of any information request received. Each operating units need to verify and justify each request base on types of concerns. Process of request has been stipulated in the Standard Operating Manual (SOM) Subsection 5.5; Procedure for External Communication (Issuance Date 01/04/2008). Other than that, policy of the company has been made available in the Sime Darby Plantation website.	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	All the document/information has been established in both Bahasa Malaysia and English. As per conversation with the management, if there is any request from the stakeholder who need explanation, the management of each operating unit is responsible to explain the information to the stakeholders.	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	There is no information request has been received for all operating units and has been verified based on the records and interview with stakeholders where there is only request for assistance recorded. As per interview, any information request will be recorded in the logbook.	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 consultation and communication procedure is documented in the Standard Operating Manual (SOM), specifically outlined in Subsection 5.5, Management Responsibility, and further detailed in Appendix 5.5.3.2, Procedure for External Communication.</p> <p>For external stakeholders, the communication of the policy has been conducted through stakeholders' consultations. These consultations were attended by various stakeholders representing all operating units under SOU 16 – Kok Foh POM.</p> <p>Details of stakeholder meeting conducted as per below</p> <p>Pertang Estate: 15/02/2024</p> <p>Kok Foh POM/ Kok Foh Estate/ Sg. Sabaling Estate:16/02/2024</p> <p>Sungei Rakyat Estate: 07/02/2024</p> <p>Additionally, policy dissemination has been ensured to all workers through regular workers' meetings and assembly sessions.</p> <p>Furthermore, as part of the UoC commitment to addressing social issues, an Assistant Manager from each operating unit has been appointed as the Official Officer Responsible for 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>List of stakeholders has been maintained and will be updated on annual basis or if there is any amendment of the stakeholders. Sighted information for the stakeholders has been maintained such as address and contact number.</p> <p>Both the estates and the mill continued to maintain the stakeholder's information (name, address, contact number, contact number, email) which included the contractors, vendors/suppliers, foreign recruitment agencies, embassy, government agencies,</p>	Complied

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		schools, local communities, CPO/PK customers, etc. Latest update was done in year 2024 for each operating unit.	
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	<p>Sime Darby Plantation Berhad established Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The code established in Bahasa Malaysia and English.</p> <p>SDPB's Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 also includes the clause "promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC)".</p> <p>Tendering process has been established where tendering process will be initiated by operating units and will be approved by regional office. Once approve, the document will be forwarded to tendering committee and selection. There are some cases that direct awarded will be done due to certain circumstances such as insufficient supplier submitted quotation and others. Sample has been taken for the tendering process and compliance with the policy that has been established.</p>	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Tendering process has been established where tendering process will be initiated by operating units and will be approved by regional office. Once approve, the document will be forwarded to tendering committee and selection. There are some cases that direct awarded will be done due to certain circumstances such as insufficient supplier submitted quotation and others. For Kok Foh POM, sample of tendering process has been taken for operations "To supply labors, equipment`s, cleaning materials and else necessary for	Complied

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		cleaning mill building tender reference number xxx/xxxx/xxx dated 16/10/2023 which there is sufficient document of tendering process which include tender notification, pricing comparison and works description. Decision to appoint the contractor has been done by regional office SOU 16- Kok Foh POM	
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	<p>The unit of certification continued to comply with legal requirements. Permits and licenses verified:</p> <p><u>Kok Foh POM</u></p> <p>i) Mill's compliance schedule under license no. 006013, ref: JAS.NHQ.600-3/1/13 valid from 1/7/23 to 30/6/24. Mill processing capacity is 45 mt/hr using land application for method of POME disposal. Limit of discharge parameters are:</p> <p>- BOD₃: 5000 mg/l</p> <p>ii) 3rd party environmental audits, at least once (1) a year, clause 26 of compliance schedule.</p> <p><u>2024</u></p> <p>Audit carried out by registered environmental auditors, lead auditor (EA0176). Date of assessment: 26/03/2024, date of report: 4/03/2024. No finding raised by the auditor.</p> <p><u>2023</u></p> <p>Audit carried out by registered environmental auditors, lead auditor (EA0102, CESSWI 4063). Date of assessment: 17/04/2023, date of report: 2/05/2023. One (1) observation raised on the housekeeping of furrow (vegetation and fronds).</p> <p><u>Stack sampling</u></p>	Non-compliance

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		<table><tr><th>Year</th><th>Stack sampling</th><th>Results vs limit</th></tr><tr><td>2023</td><td>Iso kinetic sampling by EXXXX Consult & Engineering Plt, ref: EXXXX/SDPSB-KFPOM/ISO/054/2023 Date of monitoring: 28/03/2023</td><td>Dust/particulate: 113 mg/m³ vs 150 mg/m³ NOx: 22 mg/m³ vs 500 mg/m³ SOx: 15 mg/m³ vs 500 mg/m³</td></tr><tr><td>2024</td><td>Iso kinetic sampling by EXXXX Consult & Engineering Plt, ref: EXXXX/SDPSB-KFPOM/ISO/053/2024 Date of monitoring: 26/02/2024</td><td>Dust/particulate: 110 mg/m³ vs 150 mg/m³ NOx: 16 mg/m³ vs 500 mg/m³ SOx: 12 mg/m³ vs 500 mg/m³ CO: 411.7 mg/m³ vs 1000 mg/m³</td></tr></table>	Year	Stack sampling	Results vs limit	2023	Iso kinetic sampling by EXXXX Consult & Engineering Plt, ref: EXXXX/SDPSB-KFPOM/ISO/054/2023 Date of monitoring: 28/03/2023	Dust/particulate: 113 mg/m ³ vs 150 mg/m ³ NOx: 22 mg/m ³ vs 500 mg/m ³ SOx: 15 mg/m ³ vs 500 mg/m ³	2024	Iso kinetic sampling by EXXXX Consult & Engineering Plt, ref: EXXXX/SDPSB-KFPOM/ISO/053/2024 Date of monitoring: 26/02/2024	Dust/particulate: 110 mg/m ³ vs 150 mg/m ³ NOx: 16 mg/m ³ vs 500 mg/m ³ SOx: 12 mg/m ³ vs 500 mg/m ³ CO: 411.7 mg/m ³ vs 1000 mg/m ³						
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		iii) List of certificates of fitness															
		<table><tr><th>Registration no.</th><th>Validity period</th><th>Remarks</th></tr><tr><td>NS PMD 80060</td><td>20/05/2024. Inspection carried out on 14/05/2024. Pending for CF issuance</td><td>Steam Boiler</td></tr><tr><td>NS PMD 940</td><td>Until 6/09/2024</td><td>Steam Boiler</td></tr><tr><td>NS PMT 82837</td><td>Until 2/08/2024</td><td>Air receiver</td></tr><tr><td>NS PMT 3059</td><td>Until 6/09/2024</td><td>Sterilizer</td></tr></table>	Registration no.	Validity period	Remarks	NS PMD 80060	20/05/2024. Inspection carried out on 14/05/2024. Pending for CF issuance	Steam Boiler	NS PMD 940	Until 6/09/2024	Steam Boiler	NS PMT 82837	Until 2/08/2024	Air receiver	NS PMT 3059	Until 6/09/2024	Sterilizer
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NS PMT 3059	Until 6/09/2024	Sterilizer															

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		NS PMT 3057	Until 6/09/2024	Sterilizer	
		NS PMT 3052	Until 6/09/2024	Sterilizer	
		MS PMT 3065	Until 6/09/2024	Back Pressure Receiver	
		iv) Electrical Installation License for private installation, capacity: 1,920 kW valid from 23/2/2024 – 22/02/2025.			
		v) Private Water Supply System, Water Distribution and Water Treatment, license no.: LK/3/22/00405, valid form 29/07/22 to 28/7/2025.			
		vi) List of competent persons			
		Competent person	Validity period	Remarks	
		Certified Environmental Professional in Scheduled Waste Management (CePSWaM)	Certified person by 7/10/2016 by DOE	CePSWaM/01248	
		Certified Environmental Professional in the Treatment of Palm Oil Mill Effluent (CePPOME)	Certified person by 7/10/2016 by DOE	CePPOME/00040	
		Steam Engineer, 1 st Grade	059/2008	5/05/2008	

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		Steam Engineer, 2 nd Grade	JKKP/2022/JS02/21 2	3/1/2022
		Engine driver grade 1	S16/2000	12/07/2000
		Engine driver grade 2	NS/09/EIS/02/7	12/10/2009
		AGT-AESP	AGT379247-24	Valid until 20/12/2025
		AGT-ES	AGT379241-24	Valid until 20/12/2025
<p>vii) MPOB license no. 543656004000 valid until 1/11/2023 – 31/10/2024.</p> <p>viii) Permit to Purchase, Store and Use of Sodium Hydroxide, 4500 kg (liquid) register no. NC0058/2024 valid until 31/12/2024</p> <p>ix) Water Abstraction License, license no. AP(K) – 0178, rate of abstraction, 564,160 m³ valid from 1/01/2024 to 31/12/2025.</p> <p>x) Electrical Installation License, license no. 2024/00218, serial no. 66172, maximum capacity: 3,000 kW valid from 15/03/2024 – 14/03/2025.</p> <p>xi) Fire Certificate, ref. no. NS/7/7/2019, serial no. 338066 valid from 29/08/23 – 28/08/24.</p> <p><u>Kok Foh Estate</u></p> <p>i) MPOB license no. 527424002000, valid from 1/03/2024 – 28/02/2025 for 2,133.99 ha for selling and transporting FFB.</p>				

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		<p>ii) MPOB license no. 525928011000, valid from 1/1/2024 – 31/12/2024 for production, selling and moving and storage of seedling.</p> <p>iii) Air receiver/compressor CF, NS PMT 81705 valid until 2/11/2024</p> <p>iv) Diesel and petrol permit no. PBKB/2024/P/N-000026, ref: KPDNHEP.KP 600/5/4/87), storage capacity (diesel): 15,000 litre, petrol: 300 litre valid from 4/01/2024 – 3/01/2025.</p> <p><u>Pertang Estate</u></p> <p>i) MPOB license no. 528546002000, valid from 1/04/2024 – 31/03/2025 for 876.31 ha for selling and transporting FFB.</p> <p>ii) Diesel and petrol permit no. PBKB/2023/P/N-000249, ref: KPDNHEP.(NS)600/3/3/17-SK60/2017), storage capacity (diesel): 6,000 litre valid from 6/10/2023 – 5/10/206.</p> <p>iii) Air receiver/compressor CF, NS PMT 848 valid until 1/02/2025</p> <p>iv) Permit to Purchase Highly Toxic/Controlled Pesticides, approval letter,</p> <ul style="list-style-type: none"> - NS/2024/ACP/0021(GL), quantity: 296,000 gram validity 18/04/2024 – 9/05/2024. - NS/2024/ACP/0021(GL), quantity: 135,000 gram validity 6/03/2024 – 27/03/2024 <p><u>Sg Senarut Estate</u></p> <p>i) MPOB license no. 525990102000, valid from 1/02/2024 – 31/01/2025 for 940 ha for selling and transporting FFB.</p> <p>ii) MPOB license no. 522497002000, valid from 1/08/2023 – 31/07/2024 for 562.14 ha for selling and transporting FFB.</p>	
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		<p>iii) MPOB license no. 571953011000, valid from 1/5/2024 – 30/04/2025 for production, selling and moving and storage of seedling.</p> <p>iv) Air receiver/compressor CF, JH PMT 10509 valid until 2/08/2024</p> <p>v) Air receiver/compressor CF, JH PMT 3071 valid until 2/08/2024</p> <p>vi) Diesel and petrol permit no. PBKB/2023/B/J-000288, ref: JH(SGT)0295/23 PSK), storage capacity (diesel): 9,000 litre valid from</p> <p><u>Sg Sabaling Estate</u></p> <p>i) MPOB license no. 531655002000, valid from 1/08/2023 – 31/07/2024 for 124.66 ha for selling and transporting FFB.</p> <p>ii) MPOB license no. 622142011000, valid from 19/09/2024 – 31/08/2024 for production, selling and moving and storage of seedling.</p> <p>iii) Air receiver/compressor CF, NS PMT 839 valid until 11/03/2025</p> <p>vi) Diesel and petrol permit no. PBKB/2023/P/N-000232, ref: KPDNHEP.KP 600-5/4/58 storage capacity (diesel): 10,920 litre valid from 27/08/2023 -26/08/2024.</p> <p>v) Water Abstraction License, license no. AP(K) – 0193, rate of abstraction, 18,000 m³ valid from 1/01/2024 to 31/12/2025.</p> <p>Compliance with legal requirements were not effectively demonstrated for the following issues:</p> <p>i) No valid water abstraction license obtained from BAKAJ for Sg Gemas Division (under Sg Senarut estate).</p> <p>ii) There was no valid license from SPAN for the operation of Private Water Supply System, Water Distribution and Water</p>	
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		<p>Treatment at Sg Gemas Division (under Sg Senarut estate).</p> <p>Kok Foh POM</p> <p>i) Based on site visit at anaerobic pond no.2 & 3, freeboard sighted less than 0.5 meter as stipulated in the mill's compliance schedule.</p> <p>ii) 2 electrical chargeman (A4) have not yet registered under Kok Foh POM and maintained valid license as competent A4 chargeman.</p> <p>Normative reference:</p> <p>i) Peraturan-Peraturan Abstraksi Air (Johor) 2014</p> <p>ii) Peraturan-Peraturan Industri Perkhidmatan Air (Pelesenan) 2007</p> <p>iii) License no. 006013, compliance schedule, clause no. 13</p> <p>iv) Electricity Regulations 1994 (Regulation 83)</p> <p>Thus, a major NC was raised.</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has established legal and other requirements register @ LORR to have a list of legal register to ensure compliance is in place. The system has a means to track changes to the laws and regulations. The GSD Department is responsible to track changes and the information was disseminated to all its plantations and mill operation. The newly added laws and regulations as per the following:</p> <ul style="list-style-type: none"> - Employees Social Security (Amendment) Act 2022, date review 26/9/22 - Employment Insurance System (EIS) (Amendment) Act 2022, date review 26/9/22 - Employment Act (Amendment) 2022, date review 6/1/23 	Complied

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		<ul style="list-style-type: none">- <i>Garis Panduan Pelan Pengurusan Tandan Kosong Kelapa Sawit 2021, date review 23/7/2023</i>- Occupational Safety and Health (Amendment) Act 2022, date review 1/4/2023.																
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 -	<p>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 boundary marker (red/white painted with alternate ring) and physical boundary separated with construction of trenches and parameter road. This was confirmed through the field visit at found practiced was clearly visible. Boundary and monthly patrolling record was verified. Example of boundary inspected at visited estates:</p> <table><tr><td>Estate</td><td>Location of boundary</td><td>Remarks</td></tr><tr><td>Kok Foh Estate</td><td>Field 05P</td><td>Boundary with smallholder</td></tr><tr><td>Petang Estate</td><td>Field P16A</td><td>Boundary with industry/sawmill</td></tr><tr><td>Sg Sabaling Estate</td><td>Field 04A</td><td>Boundary with smallholder</td></tr><tr><td>Sg Senarut (Sg Gemas Div)</td><td>Field P01H</td><td>Boundary with smallholder</td></tr></table>	Estate	Location of boundary	Remarks	Kok Foh Estate	Field 05P	Boundary with smallholder	Petang Estate	Field P16A	Boundary with industry/sawmill	Sg Sabaling Estate	Field 04A	Boundary with smallholder	Sg Senarut (Sg Gemas Div)	Field P01H	Boundary with smallholder	Complied
Estate	Location of boundary	Remarks																
Kok Foh Estate	Field 05P	Boundary with smallholder																
Petang Estate	Field P16A	Boundary with industry/sawmill																
Sg Sabaling Estate	Field 04A	Boundary with smallholder																
Sg Senarut (Sg Gemas Div)	Field P01H	Boundary with smallholder																
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.																		
2.2.1	A list of contracted parties is maintained. - Minor compliance -	List of contracted parties are included in the stakeholder lists, which are maintained by each operating unit. The information in the	Complied															

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		stakeholder lists includes name and addresses of contractors, their contact person and contact numbers.				
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>Each contract contains a Vendor Integrity Pledge, underscoring commitment to legal compliance encompassing labor and human rights, environmental health and safety (EHS), ethics, and management practices. Notably, the pledge mandates contractors of Sime Darby Plantation Berhad estates and mills to ensure non-withholding of employee passports and payment of minimum wages.</p> <p>All operating units adhere to the Contractor & Vendor Management Procedures (Ver. No. 0, dated 17/11/2021), established by SDP management. This framework outlines policies and procedures for contractor and vendor selection and performance monitoring. It encompasses processes at both the Group and Operating Unit levels, including contractor classification, selection, kick-off meetings, monthly KPI monitoring, participation in Safety & Health Committees, and Vendor Performance Evaluation.</p> <p>Each operating unit maintains a Contractor Master List, which includes company names and worker details, facilitating diligent</p> <p><u>Kok Foh POM</u></p> <p>Sample of contractor has been taken for canteen operator which is Tiaradamia BZ Enterprise where the contractors hired 3 workers for food handling. Sighted the typhoid vaccination records for each workers found out there is gap between the date joined and the vaccination date.</p> <table><tr><td></td><td>Joined date</td><td>Typhoid injection date</td></tr></table>		Joined date	Typhoid injection date	Non-compliance
	Joined date	Typhoid injection date				

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		Workers A	01/02/2024	06/05/2024	
		Workers B	15/04/2024	05/05/2024	
		<p>Further verification has been done with Majlis Daerah Jempol, she mentioned that the workers without typhoid injection prohibited to work in the food handling premises. Base on the payslips found out that both are working during the GAP period.</p> <p>This is not in line with Food Hygiene Regulations 2009 clause 31; Medical examination and health condition of food handler 31. (1) A food handler shall be medically examined and vaccinated by a registered medical practitioner</p> <p>Sample of workers` permit checked for canteen operator and found that SOCSO contribution has not been correctly calculated based on to Employees` social security act 1969 (Act 4)</p> <p>Month: April Total salary: RM580.00 Total employee contribution as per pay slip: RM10.15 Total contribution as "Borang 8A" form: RM7.25 As per SOCSO schedule: RM2.25 Thus, a minor NC was issued.</p>			
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has established the Vendor Integrity Pledge and Vendor Code of Business Conduct (VCOBC). The VCOBC contains clauses disallowing child, forced and trafficked labour. It can be sighted under:</p> <p>5.7 Eradication of Exploitation - The Group endeavors to eradicate all forms of bonded and forced labour, slavery, human trafficking,</p>			Complied

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		<p>and sexual exploitation by implementing International Labour Organisation (ILO) core labour standards and conventions. When supplying labour to perform work for the Group, Vendors shall refrain from using or facilitating any of the following activities:</p> <ul style="list-style-type: none"> • The Vendors' Employees are not charged with recruitment fees for the purpose of restricting free movement. • Original identification documents of the Vendors' Employees such as passport or work permits are not retained involuntarily by Vendors. • Payment of the Employees' salaries are not withheld or delayed beyond the extent permitted by applicable laws and regulations in the countries where the Vendors operate. • In addition, the Vendors shall ensure that recruitment of its Employees and workers are done via legitimate recruitment agencies, which are properly licensed to operate under applicable laws. <p>5.8 Abolishment of Child Labor & Protecting the Rights of Children – The Group seeks to promote the well-being of children and safeguard them from any form of maltreatment or exploitation, including but not limited to child sex tourism, child trafficking, and child pornography. As such, Vendors shall not employ anyone under the age of 18 or the applicable minimum legal age in the countries they operate, unless in vocational and/or formal and structured apprenticeship, educational and training programs. Verified against contractor list, OVR and signed copies of Vendor Integrity Pledge.</p>	
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	(C) For all directly sourced FFB, the mill requires:	For directly sourced FFB, information of third party FFB suppliers such as contract agreement, MPOB license, location maps with GPS	Complied

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	<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>coordinates information and evidence of ownership kept in specific FFB supplier files. Example of directly sourced FFB checked:</p> <p>i) Pxxxxxxx Pxxxxxx Sdn Bhd, ref: P/C/1123/FFB04566L, MPOB license: 582050002000 valid from period of 1/03/2024 – 28/02/2025, geo-location: 2.451914 N, 102.508056 E</p> <p>ii) Lxxxxx Bxxxxxx Sdn Bhd, ref: P/P/1123/FFB04532L, MPOB license: 524035002000 valid from period of 1/10/2023 – 30/09/2024, geo-location: 2.47800 N, 102.306001 E</p>	
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>There were several indirectly sourced FFB and the mill is still in the process of collecting the information described in 2.3.1. As to comply with RSPO Announcement dated 15 February 2022 on Interim Measure for Fulfilment of Indicator 2.3.2 of the 2018 RSPO Principles & Criteria On Legality of Indirect FFB Supplies, Sime Darby Plantation Berhad has, case register has been submitted to RSPO on 11/11/2022. 3 main challenges as to obtained land ownership evidence, MPOB license and geo-location for the indirect supplier. Standard Standing Committee (SSC) has endorsed the extension of the interim measure for the fulfilment of Indicator 2.3.2 of the 2018 P&C until the revised Principles and Criteria (P&C) is adopted by RSPO Members at the General Assembly in the year 2024. As of May 2024, there is only one (1) super dealer for Kok Foh POM and still in progress of collecting the required information as per 2.3.1.</p>	Complied
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The business plan for the mill is reflected in the form of an annual budget (MPLAN) and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilization rate and CAPEX.</p>	Complied

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		<p>The business or management plan for the estates were presented in the form of annual budget (MPLAN) with 5 years projection (2024 – 2028). The annual budget contains the crop projection and the finance allocation for field operation and administration. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.</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 d. Transportation 	
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		<div>e. Nursery</div> <div>iii. Estate administration</div> <div>a. Admin Cost</div> <div>iv. Labour overhead</div> <div>v. Road and bridges</div> <div>vi. Cost of production.</div> <div>The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2028) and well documented upon request.</div>																															
3.1.2	<div>An annual replanting programme projected for a minimum of five years with yearly review, is available.</div> <div>- Minor compliance -</div>	<div>Sime Darby Plantation Berhad SOU 16 Kok Foh POM Certification Unit has established a long-range replanting program until FY 2028. Replanting is planned for the fields older than 25 years, non-performance fields (yield) and Ganoderma infected palms. The total Ha for the projected replanting are as follows:</div> <table><tr><td>Estate</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>Kok Foh</td><td>67.36</td><td>101.54</td><td>148.16</td><td>153.72</td><td>155.02</td></tr><tr><td>Pertang</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td><td>0.00</td></tr><tr><td>Sg Senarut</td><td>68.50</td><td>192.23</td><td>152.46</td><td>131.44</td><td>47.77</td></tr><tr><td>Sg Sabaling</td><td>449.03</td><td>316.93</td><td>368.41</td><td>0.00</td><td>0.00</td></tr></table>	Estate	2024	2025	2026	2027	2028	Kok Foh	67.36	101.54	148.16	153.72	155.02	Pertang	0.00	0.00	0.00	0.00	0.00	Sg Senarut	68.50	192.23	152.46	131.44	47.77	Sg Sabaling	449.03	316.93	368.41	0.00	0.00	Complied
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3.1.3	<div>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</div> <div>- Minor compliance -</div>	<div>Sime Darby Plantation Berhad SOU 16 Kok Foh POM Certification Unit held management reviews at their respective sites on a yearly basis. Among the matters discussed during the management review are as follows: -</div>	Complied																														

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		<ol style="list-style-type: none"> 1. Introduction by Chairman 2. Results of Internal Audits covering RSPO & MSPO 3. Customer feedback 4. Status up preventive and corrective actions 5. Follow up actions from management review 6. Changes that could affect the management system 7. Recommendations for improvement 8. Improvement of the effectiveness of the management system and process 9. Resources need <p>The minutes of the meeting indicated that Internal audit findings were each thoroughly examined, and the corrective action plan were discussed. The management review was conducted at the respective operating units as follows:</p> <p>Kok Foh POM: 03/04/2024 Kok Foh Estate: 11/05/2024 Pertang Estate: 28/03/2024 Sg Senarut Estate: 12/04/2024 Sg Sabaling Estate: 01/04/2024</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.			

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3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>This has been established in the Continuous Improvement Plan 2024 respectively for both the Mill and Estatew. This compilation was made with subject to the consideration of the main social and environmental impacts. These include to continue engagement with relevant stakeholders (workers, surrounding communities, government agencies, agencies, suppliers and contractors. Management documents related to environmental plans and impact assessments maintained available. Among the documents were:</p> <p>(a) Environmental Aspect Identification (EAI) and Environmental Impact Evaluation (EIE) registers.</p> <p>(b) Environmental Improvement Plan 2024</p> <p>(c) Pollution Prevention Plan 2024</p> <p>(d) Water Management Plan. 2024</p> <p>(e) Waste Management Plan 2024</p> <p>The Continuous Management Plan 2024 for the estate/mill operations among others include the following examples.</p> <table><tr><th></th><th>Operating unit</th><th>Budget Details</th></tr><tr><td rowspan="4">1</td><td rowspan="4">Sg Senarut (Sg Gemas Div)</td><td>Terrace raker machine (mechanization)</td></tr><tr><td>Immature herbicides sprayer (ImHS)</td></tr><tr><td>Monsoon drain project (worker’s line site)</td></tr><tr><td>Upgrading of toilets</td></tr><tr><td>2</td><td>Pertang Estate</td><td>Replacement of asbestos roofing to metal deck</td></tr><tr><td>3</td><td>Kok Foh Estate</td><td>2 units o f MTG inland LS3200, 1 unit Kubota M8040 (mechanization)</td></tr></table>		Operating unit	Budget Details	1	Sg Senarut (Sg Gemas Div)	Terrace raker machine (mechanization)	Immature herbicides sprayer (ImHS)	Monsoon drain project (worker’s line site)	Upgrading of toilets	2	Pertang Estate	Replacement of asbestos roofing to metal deck	3	Kok Foh Estate	2 units o f MTG inland LS3200, 1 unit Kubota M8040 (mechanization)	Complied
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			Main and B-road resurfacing	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	RSPO metric template version 2.1 is used for the reporting of SOU16 Kok Foh Certification Unit's metrics (economic, social and environment). Data reporting period is January to December 2023 for (social and environment metrics) and economic metrics from April 2023 – March 2024 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.		Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.				
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>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 16 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 Oil 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</p>		Complied

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		<p>Darby continuously updated the SOP established. Among the updated SOP 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 	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- 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 Internal Audits by Group Sustainability Department, Workplace Inspection, and usage of checklists by the management of the operation units.</p> <p>Implementation of the SOPs has not been properly monitored.</p> <p><u>Pertang Estate</u></p> <ol style="list-style-type: none"> 1. The management has established guideline for workers to keep dogs in the housing complex and documented in the "Garis Panduan permohonan anjing dan syarat-syarat pemeliharaan anjing di dalam kawan Ladang Pertang dated 16/04/2024 which stated that all dogs need to be vaccinated to avoid Rabies diseases according to Seksyen 42, Ordinan Haiwan 1953, and vaccination card need to be show during inspections. <p>Site visit to one of the worker's house that keep dogs found out that the dog has not been vaccinated yet.</p>	Non-compliance

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		<p><u>Kok Foh POM</u></p> <p>1. Stated in the Social dialogue toolkit that 2 workers representative need to be elected from each nationality to represent during the social dialogue.</p> <p>Sighted an email from Mohd Syazwan Hafizh, Social Welfare Services dated 25/10/2023 mentioning that the operating units can appoint only 1 workers representative for workers with same nationalities that less than 10. 1WR to 10 workers.</p> <p>Sample has been taken for Indonesian workers representative where there is only 1 workers representative has been appointed even there is 13 Indonesian workers in the POM.</p> <p>Thus, a minor NC was raised.</p>	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	<p>The operating units maintain all the records of monitoring and actions taken for all issues raised during the visit. Reviewed the sampled monitoring records as follows:</p> <p><u>Kok Foh Estate</u></p> <ul style="list-style-type: none"> • Internal audit dated 18/01/2024. • Performance Monitoring Visit dated 24/01/2024. • Estate Mature Upkeep Assessment Report dated 18/01/2024. • Estate Structured Crop Recovery Assessment Report dated 18/01/2024. <p><u>Kok Foh POM</u></p> <ul style="list-style-type: none"> • Internal Audit dated 18/03/2024. 	Complied

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		<ul style="list-style-type: none"> • Structured Oil Recovery Assessment (SORA) dated 16-19/01/2024. <p><u>Pertang Estate</u></p> <ul style="list-style-type: none"> • Internal audit dated 20/04/2024. • Agronomist Visit dated 11/07/2023. • Performance Monitoring Visit dated 23/01/2024. • Estate Mature Upkeep Assessment Report dated 19/01/2024. • Estate Structured Crop Recovery Assessment Report dated 19/01/2024. <p><u>Sg Senarut Estate</u></p> <ul style="list-style-type: none"> • Internal audit dated 19/03/2024. • Estate Mature Upkeep Assessment Report dated 16-19/01/2024. • Estate Structured Crop Recovery Assessment Report dated 16-19/01/2024. • Agronomist visit dated 28/11/2023 <p><u>Sg Sabaling Estate</u></p> <ul style="list-style-type: none"> • Internal audit dated 20/03/2024. • Performance Monitoring Visit Summary Report dated 23/01/2024. • Estate Mature Upkeep Assessment Report dated 17/01/2024. <p>Estate Structured Crop Recovery Assessment Report dated 26-17/01/2024.</p>	
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Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>Social impact assessment has been conducted and report has been made available in the document title "Social Impact Assessment (SIA) Report, SOU 16- Kok Foh". The assessment has conducted from 06-09/06/2024 by sustainability compliance unit, group sustainability department.</p> <p>The objective of the assessment is to examine the impacts OU existing operations on the surrounding communities and other stakeholders and to evaluate the availability and effectiveness of a complaint and grievance mechanism.</p> <p>The scope of the assessment covers the entire SOU 16- Kok Foh stakeholders encompassing employees, employees' dependents, local communities, adjacent/neighbouring entities, contractors, suppliers, relevant government agencies, trade union, workers' representatives and gender committee and include all estate under SOU 16- Kok Foh POM.</p> <p>Stated in the assessment report, the procedure for data collection and sampling which include identification of stakeholders, SIA methodology development during pre-assessment and an interview will be used with stakeholders.</p> <p>SOU16 Kok Foh has carried out an aspect and impact assessments relating to environmental impacts based on documents as following:</p>	Complied

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		<p>a) Appendix 5.4.1b – Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register</p> <p>b) Appendix 5.4.1c – Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI</p> <p>c) Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE.</p> <p>There is no change of current practices required to mitigate negative effects based on identified impacts for both the mill and estates. However, the mill and estates have conducted periodical review on the aspects and impacts identified and evaluated as registered.</p> <p>The mill and estates have continuously implemented its annual programs that were established as part of its individual Pollution Prevention Plan. Managers and Assistant Managers of mill and estate were identified as person-incharge of the programme(s) which were established upon review of the aspect and impact register.</p> <p>Changes observed from last assessment:</p> <p>i) New additional SEIA for Kok Foh Estate was carried out in April 2024 to assess the new biogas plant.</p> <p>ii) Internal SEIA report for conversion of ex-rubber plantation to oil palm plantation in February 2023 (383.3 ha) and December 2023 (425.68 ha) for Sg Senarut Estate</p> <p>iii) Internal SEIA report for conversion of ex-rubber plantation to oil palm plantation in May 2023 (448.67 ha)</p>	
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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>Social management plan has been established for all the issues that has been highlighted in the assessment which can be sighted in the document of social management. Sample has of issues and management plan has been taken and verified by the auditor as below.</p> <ol style="list-style-type: none"> 1. Complaint on expensive price at the sundry store Management plan- The management has plan to monitor the pricing at the sundry store and will make comparison between another sundry store nearby. 2. Complaint on poor water quality that has been supplied through water treatment plant especially during rainy season. Management plan- Operating units will apply the for-government water supply (SAINS). 3. Complaint on stray dogs in the housing area which resulting fear among workers to let their children out from the house to play Management plan- OU is proposing to provide cages to catch the stray dogs and send to veterinary for 1 dose injection at RM80/dose. 4. Request by the workers to repair current badminton court and to construct new volleyball court. 5. Management plan- OU has plan to include in the CAPEX 2024 <p>Environmental aspect impact (EAI) and environmental management plan was not effectively developed for Kok Foh POM effluent operation. EAI dated 17/4/2024 for Kok Foh POM's effluent has yet to include all possible environment aspect (normal,</p>	Non-compliance
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		abnormal and emergency) and related management plan to mitigate the impact to environment. Thus, a minor NC was issued.	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The Social 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> <ul style="list-style-type: none"> a. Gender Committee (once every 2 months), NUPW @ Union meeting (at least once a year) b. Safety Meeting (quarterly) c. Complaint & Request from internal & external stakeholders and muster briefing). d. Stakeholders meeting (annual meeting) e. Social dialog (monthly), EWC (Employee Welfare Committee – quarterly) <p>Environmental Management Plans were developed, consisting of EAI & EIE, Waste Management Plan, Water Management Plan, HCV Area & Biodiversity, Energy Management & Pollution Prevention and IPM Management which were available for verification. Among the implantation of the environment management plan were mainly focused on environmental conservations and reductions of pesticides and fossil fuels. Among the implementation that were verified included the implementation of IPM in the estates such as the well-established beneficial plants, segregation of waste and disposal in accordance with legal requirements, bi-annual monitoring of smoke emission at the mill, well established buffer zones and periodic water quality monitoring among others. The Environment Management Plan is reviewed yearly, usually at the beginning of the year with inputs obtained from the management and workers representatives.</p>	Complied

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Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>Guideline for recruitment of local workers year 2020 which has outlined the process of recruitment which has been divided into 2 which are pre recruitment and post recruitment.</p> <p>For pre recruitment, the management shall identify vacant positions in the operating units. Interested parties can fill up the applications and will be screened and short listed by the management. During the interview, the assistant manager needs to brief about the jobs, tasks and expectations and list for successful application need to be approved by the manager and proceeds with the medical.</p> <p>While for migrant workers, documented in the migrant worker recruitment procedure year 2021.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Sample of 12 newly recruited workers in year 2023 has been taken by auditor for verification which include workers from different origin countries, gender and races. It has been verified that the recruitment procedure has been implemented and all records have been maintained.</p> <p>For local workers, verified job application form, records for interview, medical check-up records and offer letter. While for foreign workers, records verified is medical check-up (FOMEMA), and offer letter.</p> <p>As per interview with workers, it has been confirmed that the recruitment process is in line with the procedure.</p> <p>There is no promotion and termination has taken place in year 2023 and has been confirmed through interview, document review.</p>	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			

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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 in compliance to legal requirements as stated below.</p> <p><u>Kok Foh POM</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 sample HIRARC taken was reviewed on 17/06/2023 for Steriliser. Other HIRARC reviewed was Reception, Boiler and Oil Recovery Station. 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/15/ASS/00/363-2020-102. Date of Assessment: 28/07/2020. 3. Medical Surveillance Programme has been performed successfully for the year 2023 on 11-13/09/2023 & 29/09/2023 for 26 workers, found that all of them are fit. 4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. Noise Risk Assessment (NRA) has been conducted on 29-30/10/2019. NRA Report (Assessor Registration Number: HQ/16/PEB/00/158) available for verification. The recommendation stated by the assessor have been affectively addressed as verified. 	Non-compliance
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		<p>5. An audiometric testing was done on 06/11/2023. 45 workers was examined and results indicated that there were 24 workers haven normal hearing, 21 employees hearing loss, 2 employees have hearing impairment (subject to mandatory annual testing) and no employees falls under STS. No NIHL case reported.</p> <p>6. LEV Monitoring has been conducted from Assessor with reference number #HQ/16/JHII/00/23 with report reference number #HQ/16/JHII/00/23-2024/013 dated 25/03/2024.</p> <p><u>Kok Foh Estate</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. Latest Review was made on 05/02/2024.</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. Chemical Hazard Risk Assessment dated 28/07/2020, Ref No: HQ/15/ASS/00/363-2020-098.</p> <p>3. Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification. The management has conducted the medical surveillance dated 22/09/2023 & 03/10/2023, for 23 workers. All workers are declared fit to work by OHD.</p>	
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		<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. Noise risk assessment dated 19/12/2022, conducted by assessor with registration number HQ/16/PEB/00/158. Refer report reference NRA/KOKFOHADD/12-22/2.</p> <p>5. The audiometric was conducted on 06/11/2023 by E TXXX CXXXXXXX & EXXXXXXXXXX PXX. There is 66 workers was examined, result indicated that 20 workers was normal, 16 workers having Hearing Loss and no workers fall under STS.</p> <p><u>Pertang Estate</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, Frond Stacking and Fertilizer Application MTFA. Verification done on the documentations and operations indicated that all the risk controls were adhered to. Latest Review was made on 27/07/2023.</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. Chemical Hazard Risk Assessment dated 27/07/2020, Ref No: HQ/15/ASS/00/363-2020-097.</p> <p>3. Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification. The management has conducted the medical</p>	
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		<p>surveillance dated 09-17/01/2024, for 22 workers. All workers are declared fit to work by OHD.</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. Noise risk assessment dated 04/09/2020, conducted by assessor with registration number HQ/16/PEB/00/158. Refer report reference HQ/LPROYKPEB/20/00244.</p> <p>5. The audiometric was conducted on 13-15/05/2024 by KXXXXX TXX. There is 16 workers was examined, result and report was in progress. Previous audiometric test has been conducted 08/04/2023 and 21/07/2023 for 5 workers and 6 workers respectively. Result indicates that 4 employees having normal results, 6 employees have hearing impairment and 1 workers have STS. Retest has been conducted on 29/04/2023.</p> <p><u>Sg Senarut Estate</u></p> <p>1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Nursery, Mechanical Buffalo and Spraying. Verification done on the documentations and operations indicated that all the risk controls were adhered to. Latest Review was made on 02/08/2023.</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. Chemical Hazard Risk</p>	
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		<p>Assessment dated 09/06/2020, Ref No: HQ/15/ASS/00/363-2020-057.</p> <p>3. Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification. The management has conducted the medical surveillance dated 27/10/2023, for 24 workers and 25/01/2024 for 1 worker. All workers are declared fit to work by OHD.</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. Noise risk assessment dated 07/08/2020, conducted by assessor with registration number HQ/16/PEB/00/158. Refer report reference HQ/LPROYKPEB/20/00299. Additional report was sighted. Refer report dated 07/12/2023 & 18/01/2024 with report reference number ME/0124/011S.</p> <p>5. The audiometric was conducted on 07/06/2023 by NXXXXXXX CXXXXXXXXXX. There is 22 workers was examined, result indicates that 4 employees having normal results, 3 employees have hearing impairment, 6 employees having hearing loss and 9 workers have STS. Retest has been conducted on 09/08/2023.</p> <p><u>Sg Sabaling Estate</u></p> <p>1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Replanting and Chemical Store. Verification done on the documentations and operations indicated that all the risk controls were adhered to. Latest Review was made on 19/08/2022.</p>	
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		<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. Chemical Hazard Risk Assessment dated 28/07/2020, Ref No: HQ/15/ASS/00/363-2020-100.</p> <p>3. Medical Surveillance were conducted in the estate, results of annual medical surveillance were available in the estates for verification. The management has conducted the medical surveillance dated 28/03/2024, for 9 workers. All workers are declared fit to work by OHD.</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. Noise risk assessment dated 09/07/2020, conducted by assessor with registration number HQ/16/PEB/00/158. Refer report reference HQ/LPROYKPEB/20/00223.</p> <p>5. The audiometric was conducted on 07/12/2023 by KXXXXXX TXX. There is 8 workers was examined, result indicates that 0 employee having normal results, 4 employees have hearing impairment, 8 employees having hearing loss and 3 workers have STS. Retest has been conducted on 14/12/2023.</p> <p><u>Major NC</u></p> <p>Mitigation controls for LOTO and Chemical Management Procedures was not effectively implemented.</p>	
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		<p><u>Kok Foh POM</u></p> <p>Site visit at Switch Board Boiler Station, it was found that the process of energy isolation of boiler 1 cables were not according with Lock Out And Tag Out (LOTO) Procedures (SDB/SDH/GSQM/ESH/305) Section 6.2 (c) Disconnected the energy source, (d) apply LOTO Devices, (e) Control Stored Energy, (f) Verify isolation of equipment.</p> <p><u>Kok Foh POM</u></p> <p>During site visit at Ramp Area, 1 bag of Chemical Soda Ash stored in the tools locker. In addition, there was no SDS available at site. This was not in line with Chemical Safety Management Procedures (UM/HSE/OCP/04) section 6.4 Storage of chemicals and 6.5 Handling of chemicals.</p> <p>Thus, a major NC was raised.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Annual Health and Safety Plan available for the estate and mill are mostly implemented through Annual Training Program 2024 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. ▪ 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>	Complied

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		<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 • 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>	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>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 2024. The training identified covers the safety and health, environmental and social aspect.</p> <p>Means implemented by SOU 16 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. 	Complied

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		<ul style="list-style-type: none">Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended. <p>Random interviews with workers showed that they understood what RSPO is, the several subsidiaries' policies, what does their work/job SOP states and the consequences if deviated, the need to put on PPE and demonstrate donning PPE and when it should be changed, the use of fire extinguishers, understanding workplace hazards, risks and needed control measures, etc.</p>																					
3.7.2	Records of training are maintained. - Minor Compliance -	<p>The operating units maintained the training records conducted. Sample of the training records are as following:</p> <p><u>Kok Foh Estate</u></p> <table><tr><th>Training</th><th>Date</th></tr><tr><td>Policy Briefing</td><td>17/05/2024</td></tr><tr><td>First Aid Training</td><td>17/05/2024</td></tr><tr><td>Fire Drill Training</td><td>13/05/2024</td></tr><tr><td>PPE Training for manuring and spraying</td><td>15/05/2024</td></tr><tr><td>SW Training</td><td>20/03/2024</td></tr><tr><td>Harvesting Training</td><td>20/02/2024</td></tr><tr><td>Chemical handling management</td><td>23/02/2024</td></tr><tr><td>EAI & EIE Training</td><td>15/04/2024</td></tr><tr><td>Safety Driving</td><td>11/11/2023</td></tr></table>	Training	Date	Policy Briefing	17/05/2024	First Aid Training	17/05/2024	Fire Drill Training	13/05/2024	PPE Training for manuring and spraying	15/05/2024	SW Training	20/03/2024	Harvesting Training	20/02/2024	Chemical handling management	23/02/2024	EAI & EIE Training	15/04/2024	Safety Driving	11/11/2023	Complied
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		Grievance Training	09/08/2024	
		Chemical handling and triple rinsing	03/05/2023	
		Chemical labelling management	29/04/2024	
		Driver training	04/03/2024	
		<u>Kok Foh POM</u>		
		Training	Date	
		NADOPOD Briefing	16/05/2024	
		Pictorial Work Instruction (PWI) Briefing	18/05/2024	
		Chemical Handling & Spillage Training	16/05/2024	
		HIRARC Training	16/05/2024	
		Hearing Conservation Training	16/05/2024	
		PTW & LOTO Training	16/05/2024	
		Fire Drill Training	13/05/2024	
		Schedule Waste Training	07/05/2024	
		NRA & CHRA To Contractor	19/04/2024	
		First Aid Training	04/04/2024	
		<u>Pertang Estate</u>		
		Training	Date	

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		HCV & RTE Training	17/05/2024	
		Fire Drill Training	15/05/2024	
		First aid Training	13/05/2024	
		Schedule Waste Training	15/05/2024	
		E-sime+ Training	11/05/2024	
		PTW, NRA and Medical Surveillance Training	10/05/2024	
		Chemical Mixing, Eyewash Briefing	07/05/2024	
		Chemical Handling Training	10/05/2024	
		RSPO Awareness Training	08/01/2024	
		<u>Sg Senarut Estate</u>		
		Training	Date	
		RSPO Briefing	20/05/2024	
		Hearing Conservation Training	16/05/2024	
		Schedule waste training	16/05/2024	
		Chemical awareness + USECCH	16/05/2024	
		PPE Awareness	15/05/2024	
		Accident Report Training	10/05/2024	
		First Aid training	10/05/2024	

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		HIRARC Training	08/05/2024	
		Inter pump Training	26/02/2024	
		Fire Drill Training	20/02/2024	
		Policy Briefing	28/03/2024	
		<u>Sg Sabaling Estate</u>		
		Training	Date	
		COBC and safety Briefing	22/05/2024	
		Schedule waste training	03/05/2024	
		Manuring Training	12/04/2024	
		Harvesting Training	05/02/2024	
		PPE Briefing	02/04/2024	
		HIRARC Training	05/01/2024	
		EAI & EIE Training	15/04/2024	
		First aid Training	17/05/2024	
		ERP & Fire Drill Training	21/12/2023	
		Chemical Handling	2503/2024	
		Triple Rinse and Spraying Work Training	25/03/2024	

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3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	Supply Chain (SCCS) Training was conducted for all critical points identified in the Supply Chain Process as FY 2023-2024. The critical points were weighbridge, grading, extraction, clarification, nut & kernel plant, laboratory, despatch, waste management and transporter.	Complied
<p>Criterion 3.8: Supply chain requirement for mills</p> <p>(note: All supply chain requirements are considered as Critical (C). However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	Not applicable. Kok Foh POM currently under mass balance module.	Complied
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	Kok Foh POM receives and processes certified FFB from its own supply base and outside crop producer (OCP). All OCP crop received are non-RSPO certified FFB. Therefore, the mill has opted for Mass Balance module.	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. (Table 10)	Complied

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	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.		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>The registration of PalmTrace will be carried out by the GSD Department. All transaction will be registered in the PalmTrace. Kok Foh POM registered license available in PalmTrace as following:</p> <ul style="list-style-type: none"> - Member ID: RSPO_PO1000000296 - Member category: Oil Mill - RSPO Membership No.: 1-0008-04-000-00 - License Status: expires on 6/7/2024 	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol 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. 	<p>Procedure namely Sime Darby Plantation Berhad – Sustainable Supply Chain and Traceability Procedure; document ID: SD/SDP/GSD/SCCS/202401/SCCS, version:02 dated January 2024.</p> <p>The procedure was established which covers responsibility, reporting of certified CPO/PK, non-conformance material and documents, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, Record keeping, Training, Complaint Communication and Claim and etc.</p> <p>The Mill Manager as Head of Operating Unit has the overall responsibility for the implementation of SOP, and he may assign roles to relevant personnel or invite personnel from various departments necessary to assist in the SOP implementation. Sighted the identified and assigned suitable employees to implement and maintain the traceability system by management.</p> <p>The procedures for receiving and processing certified and non-certified FFBs are documented in the Sime Darby Plantation – Sustainable Supply Chain and Traceability Procedure; document</p>	Complied

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	d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.	ID: SD/SDP/GSD/SCCS/202401/SCCS, version:02 dated January 2024.	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Addressed in Sustainable Supply Chain and Traceability Procedure, version no:2 approved on January 2024 (SD/SDP/GSD/SCCS/202401/SCCS) under section 18.0 Internal Audit procedure. Based on the procedure, the internal audit is to be conducted annually as per Internal Audit Procedure. Additional procedure for internal audit process ref, SDP/GSD/SCU/IAP, rev:3 dated 31/01/23 was recently developed as guidance procedure for internal audit.</p> <p>Combined internal audit for supply chain was last conducted on 18/3/24 by 4 internal auditors from Group Sustainability Department. 5 NC raised with regards to RSPO SCCS component. The results of Internal Audit were discussed in the Management Review Meeting as sighted in minutes meeting conducted on 03/04/2024.</p>	Complied
3.8.7	<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>i)The accompanying documents of incoming FFB from own estate are estate's weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate's ticket number is recorded in the mill's ticket number. Sample of weighbridge ticket checked:</p> <p>WB ticket Number: 232191, Estate's DO: 067843</p> <p>Supplier: E304 – Kok Foh Estate</p> <p>Date of delivery: 1/4/2024</p> <p>Weight/truck/field/bunches: 11.64 mt/JPG5589/02KA/526</p> <p>RSPO certificate no.: GGC-SDPKF-RSPOPC-J1-2021</p>	Non-compliance

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		<p>WB ticket Number: 5784, Estate's DO: 8726 Supplier: E138 – Pertang Estate Date of delivery: 01/01/2024 Weight/truck/field/bunches: 32.53mt/SYB1185/2010P & 2016A/2027 RSPO certificate no.: GGC-SDPKF-RSPOPC-J1-2021</p> <p>WB ticket Number: 229599, Estate's DO: 18942 Supplier: E149 – Muar Estate Date of delivery: 1/2/2024 Weight/truck/field/bunches: 10.33mt/ JME3868(7)/06G1, 2019B RSPO certificate no.: GGC-SDPKF-RSPOPC-J1-2021</p> <p>WB ticket Number: E127, Estate's DO: 3116 Supplier: E127 – Sg Senarut Estate Date of delivery: 4/3/2024 Weight/truck/field/bunches: 13.67mt/JPM1185/01A/638 RSPO certificate no.: GGC-SDPKF-RSPOPC-J1-2021</p> <p>ii) There has been no projected overproduction during the period under reviewed. Nonetheless, based on interview with the staff, the facility is aware of this requirement</p> <p>iii) Handling of non-conforming FFB and/or documents is addressed in the Sustainable Supply Chain and Traceability Procedure,</p>	
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		SD/SDP/GSD/SCCS/202401/SCCS, version:02 dated January 2024 under 11.0 non-conforming products and Document. Mechanism on handling of non-conforming documents was not effectively implemented. Non-conforming documents were recorded from Sg Senarut Estate FFB delivery note no.: 29759(1/1/24), 3116 (4/3/24), 3046 (2/2/2024) and 481 (1/4/24) which stated wrong/obsolete RSPO certificate number of previous CB. Thus, a major NC was raised.	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. 	<p>Kok Foh POM ensured the required information is available in document form. Based on sampled contracts [i.e., S/CCE/2401/PK0005 the following information was available:</p> <ul style="list-style-type: none"> The name and address of the buyer – confidential The name and address of the seller – KKS Kok Foh The loading or shipment/ delivery date: January 2024 The date on which the documents were issued, 31/01/2024, dispatch ticket no. 018311 A description of the product, including the applicable supply chain model, e.g. "RSPO MB Palm kernel" The quantity of the products delivered: 42.97 mt Related transport documentation, e.g. dispatch ticket no. 018311 Supply chain certificate number of the seller: GGC-SDPKF-RSPOPC-J1-2021 A unique identification numbers – TR-1a4242e7-e0e6 <p>CPO despatch, contract ref: S/CCE/2307/CPO0004</p> <ul style="list-style-type: none"> The name and address of the buyer – confidential The name and address of the seller – KKS Kok Foh The loading or shipment/ delivery date: 30/06/2023 The date on which the documents were issued, 30/06/2023 	Complied

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		<ul style="list-style-type: none"> • A description of the product, including the applicable supply chain model, e.g. "CPO RSPO MB" • The quantity of the products delivered: 35.41 mt • Related transport documentation, e.g. dispatch ticket no. 017477 • Supply chain certificate number of the seller: GGC-SDPKF-RSPOPC-J1-2021 • A unique identification numbers – TR-fef97340-4bd2 	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>No FFB and/or oil palm products processing outsource by Kok Foh POM except for CPO delivery transportation only. The mill adapted Sime Darby established Standard Operating procedure for outsourced activities as per Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability Procedure, doc. ID: SD/SDP/GSD/SCCS/202401/SCCS, version:02 dated January 2024 13.0: Outsourced Contractors.</p> <p>In the SOP under section 13.1 stated that CPO Mill cannot outsourced processing activities like refining or crushing.</p> <p>The list of outsourced contractors was registered in List of Stakeholder records that CPO transporter as per sighted contract agreement as following:</p> <p>Nxxxxxxx Ixxxxxxx (M) Sdn Bhd; Transportation of Crude Palm Oil ("CPO") (Service) for Sime Darby Plantation Berhad's Peninsular Malaysia's Oil Mills – Letter of Award (LOA); dated: 23/03/24; Contract period valid from 7/11/23 – 31/10/24.</p>	Complied

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		<p>Sime Darby has issued Memorandum to all contractors dated 26/6/2019. In the memorandum stated the contractors have to comply as follows.</p> <ol style="list-style-type: none"> 1. Comply with local legal requirements 2. Attend the RSPO/ISCC/MSPO/SCCS briefing or training organized by the company 3. Having signed and enforceable agreement with the company 4. Provide access to the auditors to contractors' operation site(s) and employees whenever deemed necessary 5. Having related working permits 6. Ensure PPE utilization by contractors' employee while being in the company premise <p>The Letter of Award is used as the documented control system that states all procedures and processes which is bound by the contractor.</p> <p>Stated under section 5(d)(iii), 'permit the CB appointed by the company to conduct audit on its or its sub-contractors' operations and provide access to all relevant systems, documents and records when requested by the CB.</p>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	No FFB and/or oil palm products processing outsource by Kok Foh POM except for CPO delivery transportation only. For PK, transportation arranged by buyer to the KCP. The list of outsourced contractors was registered in List of Stakeholder records that included the CPO transporter.	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.	As to date no new contractors appointed by Sime Darby Plantation Berhad.	Complied

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3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 	<ul style="list-style-type: none"> i) All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible. Related purchasing goods in and sales good out report in the earlier indicator under 3.8.7 and 3.8.8. ii) The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability Procedure, doc. ID: SD/SDP/GSD/SCCS/202401/SCCS, version:02 dated January 2024 iii) NA as the mill is using MB model iv) All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are recorded on a three-monthly basis in the mill's mass balance accounting sheet. The data was mostly sourced from the mill's Daily Production Report. Based on verification of the MB accounting sheet, there was no short selling made since the last assessment. 	Complied
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. As for the last review period, extraction rate recorded as;</p> <p>CPO: 20.34%</p> <p>KER: 5.0%</p>	Complied

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3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	NA as the mill is under Mass Balance module.	Complied
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	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. RSPO certified volumes sold under different scheme or as conventional were not registered in the RSPO PalmTrace.	Complied
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not use. 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 RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.	Sime Darby Plantation Berhad's website has been 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

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4.2	<p>In corporate communications, a member is allowed to:</p> <ul style="list-style-type: none"> A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of RSPO D. state the member's history with regard to RSPO E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership 	<p>Sime Darby Plantation Berhad's website has been 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.</p> <p>The website had not displayed the RSPO website and had not display any RSPO Trademark.</p>	Complied
4.3	<p>Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.</p>	No RSPO corporate logo used by Sime Darby Plantation Berhad.	Complied
4.4	<p>In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.</p>	No misleading statement made by the company as verified on the website	Complied
4.5	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> • "We have been sourcing RSPO certified palm oil since (YEAR)." • "We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year." • "We have been RSPO certified since (YEAR)." • "We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil." • "In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified." • "Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits." • "We are RSPO certified. Ask us for our RSPO certified products." 	No misleading statement made by the company as verified on the website	Complied

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4.6	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <p>i. "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)."</p> <p>ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim.</p> <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: "This reported figure is not audited through RSPO Certification".</p>	No misleading statement made by the company to make product-related claims in their corporate communication as verified on the website	Complied
Product-specific communications			
5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	No product specific communications made about an individual product that contains RSPO certified sustainable palm oil made by Sime Darby Plantation Berhad	Complied
5.1.2	Product-specific communications are voluntary.	No product specific communications made about an individual product that contains RSPO certified sustainable palm oil made by Sime Darby Plantation Berhad	Complied

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5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	No RSPO label displayed for product-specific communications made by Kok Foh POM	Complied
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	No RSPO label displayed for product-specific communications made by Kok Foh POM	Complied
5.1.5	<p>If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 	Not applicable. Kok Foh POM is not producing end products which involve retailers, traders or distributors.	Complied
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	Not applicable. Kok Foh POM is not producing end products which involve retailers, traders or distributors.	Complied

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5.2 Off pack claims			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	No off-pack claim made in any product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	Complied
5.2.2	When confirming the sale of certified palm oil 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.	If there is any physical RSPO claim, Shipping documentation will be verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e product/commodity with SCC model (CPO/Palm Kernel RSPO MB) and RSPO certificate number.	Complied
5.2.3	Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options: <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil 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 products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 	Kok Foh POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable
5.3 On pack claims			
5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on	Not applicable as no on pack claims made by Kok Foh POM	Not Applicable

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	pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.		
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	Not applicable as no on pack claims made by Kok Foh POM	Not Applicable
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	Not applicable as no on pack claims made by Kok Foh POM	Not Applicable
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	Not applicable as no on pack claims made by Kok Foh POM	Not Applicable
	<p>D) For Products covered with Book and Claim (B&C):</p> <ul style="list-style-type: none"> • RSPO CREDITS* • Supports the production of RSPO certified palm oil* • Contains palm oil covered by the purchase of RSPO Credits* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	Not applicable as no on pack claims made by Kok Foh POM	Not Applicable

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5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	Not applicable as no on pack claims made by Kok Foh POM	Not Applicable
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	Not applicable as no on pack claims made by Kok Foh POM	Not Applicable
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	Not applicable as no on pack claims made by Kok Foh POM	Not Applicable
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	Not applicable as no on pack claims made by Kok Foh POM	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			
	95% of the palm oil content must be RSPO MB-certified.	Oil palm content is 100% CPO and claim as RSPO MB-certified.	Complied
	If 100% of RSPO MB certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	Non-certified FFB comes from external crop and since Kok Foh POM is using Mass Balance module, the non-certified volume is covered in the Mass Balance sheet.	Complied
Messaging			
	Messaging ALLOWED in storytelling in product-specific communications includes: <ul style="list-style-type: none"> • [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. • The volume of [palm oil 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. 	Kok Foh POM has not made any product-specific communications in any RSPO MB product claims.	Complied

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Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil 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". 	Kok Foh POM has not made any product-specific communications in any RSPO MB product claims.	Complied
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 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>	Sime Darby Plantation Berhad has established human right charter as commitment to respect human right updated on June 2023. Commitment of Sime Darby Plantations has been outlined in clause 3.2 which included but not limited to equal opportunities, respecting freedom of association, combating modern slavery, enhancing health and safety, protecting the right of children, and eliminating violence and harassment. Other than that, Sime Darby Plantation Berhad has been established other policy regards to human right defender in the document "Policy on the Protection of Human Rights Defenders (HRDs)" updated 2020 which clearly stated in clause 3.2 that in the course of their engagement with SDP shall be protected from violence, threats and all forms of retaliation.	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	As per verification through interview and documentation, there is evidence that all operating units did instigate violence or use any form or harassment There is no cases of harassment included sexual harassment, bullying and abuse has been reported and identified by auditor during the audit.	Complied

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Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties		
4.2.1	<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 whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Grievance procedure has been established Grievance Response Standard Operating Procedure updated on 18/07/2022 where the management of has established several methods to make any complaint such as workers representative meeting (social dialogue on monthly basis), gender committee meeting every 2 months, online platform (suara kami, whistleblowing) and also through email that will be handle by Grievance units. The procedure also classified the cases for complainer that required to maintain anonymous or not.</p> <p>The awareness on surrounding communities for complaints or suggestion have been given during "Mesyuarat Bersama Pihak Berkepentingan" included village head, school representative, OCP supplier, contractor and others. The estate management has also conducted the training for employees and stakeholders respectively.</p> <p>As per interview, both stakeholders and workers can demonstrate their understanding on the procedure that has been established</p> <p>Details of stakeholder meeting Pertang Estate: 15/02/2024 Kok Foh POM/ Kok Foh Estate/ Sg. Sabaling Estate:16/02/2024 Sungei Rakyat Estate: 07/02/2024</p> <p>While for workers, it has been conducted during the morning muster call.</p> <p>Pertang Estate: 08/01/2024</p>

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		<p>Kok Foh POM: 12/02/2024 for POM workers and 18/05/2024 for contract workers</p> <p>Kok Foh Estate: 12/08/2023</p> <p>Sungei Rakyat Estate: 21/03/2024 (Sungei Gemas Division) and 28/03/2024 (Main division)</p>	
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>There is evidence that the procedure has been made available and in place where their procedure has been communicated to all workers during morning muster call on weekly basis. Other than that, it has been posted at the housing quarters, muster round and office. QR for suara kami has been pasted at the safety helmet for each worker. As per interview, workers and stakeholders can demonstrate their understanding on procedures. There is no illiterate parties has been identified for each operating units.</p>	Complied
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>There is evidence that any grievance that has been raised by workers/stakeholders has been responded in timely manner. As per interview with the workers, the management of each operating units is responsive for all complaint/grievance receive. Total 8 grievances have been received for SOU 16-Kok Foh POM Operating Units which has been responded within 3 months which some of the cases where anonymous and required investigation.</p>	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation 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. 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</p>	Complied

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		such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.	
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	<p>Sime Darby Plantation Berhad is deeply committed to promoting sustainable development in local communities through extensive consultation and addressing social and environmental issues. The company's contributions are diverse and aimed at fostering social and environmental benefits.</p> <p>The company's sustainable development initiatives, including consultations with local communities, are prominently showcased on its website. For example, projects highlighted on the company's website, such as those detailed at https://www.yayasansimedarby.com/our-projects/community-health, exemplify efforts to address community health needs and enhance well-being.</p> <p>Specific contributions to community development initiatives by the uoC, derived from consultations with local communities, include:</p> <ol style="list-style-type: none"> (1) Facilitating Hindu Worship Practices: Supporting the affairs of Hindu workers to worship at the temple by providing clean water. (2) Support for School Activities: Contributing cash or equipment for various school events, enriching educational opportunities for local students. (3) Community Water Provision: Contributing to providing water access to local communities, addressing essential needs for clean water. 	Complied

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		<p>(4) Support for Research Initiatives: Assisting final year students at UiTM with research matters and thesis preparation, nurturing academic excellence and knowledge dissemination.</p> <p>These contributions underscore Sime Darby Plantation Berhad’s dedication to community development and reflect tangible outcomes resulting from consultations with local communities. By actively engaging with stakeholders and addressing identified needs, the company continues to make meaningful contributions to local sustainable development.</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>All sample operating units able to demonstrate the evidence of legal ownership if its lands through possession of land titles which has been owned by Sime Darby Plantations Berhad.</p> <p>For Pertang Estate, sample of land title as per below</p> <table><tr><td>No</td><td>Land title no.</td><td>Lot no.</td></tr><tr><td>1</td><td>CT7xxxx</td><td>1xxx</td></tr><tr><td>2</td><td>CT6xxx</td><td>9xx</td></tr><tr><td>3</td><td>9xxx</td><td>3xx</td></tr><tr><td>4</td><td>1xxx</td><td>4xx</td></tr></table> <p><u>Sungei Senarut Estate</u></p> <table><tr><td>No</td><td>Land title no.</td><td>Lot no.</td><td>Hectarage</td></tr><tr><td>1</td><td>5xx</td><td>x</td><td>0.195</td></tr><tr><td>2</td><td>5xx</td><td>x</td><td>0.225</td></tr></table>	No	Land title no.	Lot no.	1	CT7xxxx	1xxx	2	CT6xxx	9xx	3	9xxx	3xx	4	1xxx	4xx	No	Land title no.	Lot no.	Hectarage	1	5xx	x	0.195	2	5xx	x	0.225	Complied
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		<table> <tr> <td>3</td><td>5xx</td><td>xx</td><td>2.29</td></tr> <tr> <td>4</td><td>6xxx</td><td>xx</td><td>5.60</td></tr> </table> <p><u>Sg Sabaling Estate</u> There are total 9 lands titles for Sg. Sabaling Estate with total land area of 1321.91Ha.</p> <table> <tr> <th>No.</th><th>Land title No</th><th>Lot No.</th><th>Hectarage</th></tr> <tr> <td>1</td><td>147xx</td><td>4xx</td><td>93.00</td></tr> <tr> <td>2</td><td>147xx</td><td>4xx</td><td>123.00</td></tr> <tr> <td>3</td><td>147xx</td><td>4xx</td><td>100.00</td></tr> <tr> <td>4</td><td>147xx</td><td>4xx</td><td>1214.00</td></tr> </table>	3	5xx	xx	2.29	4	6xxx	xx	5.60	No.	Land title No	Lot No.	Hectarage	1	147xx	4xx	93.00	2	147xx	4xx	123.00	3	147xx	4xx	100.00	4	147xx	4xx	1214.00	
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4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	SDPB developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new development. No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Onsite visit to boundary area, sighted boundary stone and trenches were available to demarcate the boundary of land. Onsite interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied																												
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups,	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. The management conduct an annual face to face	Complied																												

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	including information on the steps that are taken to involve them in decision making. - Minor compliance -	session with external stakeholder and the minutes of the "Minit Mesyuarat Bersama Pihak Berkepentingan" are available for consultation and discussed issues related to the affected group includes land. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. The management conduct an annual face to face session with external stakeholder and the minutes of the "Minit Mesyuarat Bersama Pihak Berkepentingan" are available for consultation and discussed issues related to the affected group includes land. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. The management conduct an annual face to face session with external stakeholder and the minutes of the "Minit Mesyuarat Bersama Pihak Berkepentingan" are available for consultation and discussed issues related to the affected group includes land. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	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).	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. The management conduct an annual face to face	Complied

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	- Critical (Major) compliance -	session with external stakeholder and the minutes of the "Minit Mesyuarat Bersama Pihak Berkepentingan" are available for consultation and discussed issues related to the affected group includes land. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. The management conduct an annual face to face session with external stakeholder and the minutes of the "Minit Mesyuarat Bersama Pihak Berkepentingan" are available for consultation and discussed issues related to the affected group includes land. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. The management conduct an annual face to face session with external stakeholder and the minutes of the "Minit Mesyuarat Bersama Pihak Berkepentingan" are available for consultation and discussed issues related to the affected group includes land. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. The management conduct an annual face to face	Complied

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		session with external stakeholder and the minutes of the "Minit Mesyuarat Bersama Pihak Berkepentingan" are available for consultation and discussed issues related to the affected group includes land. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.																																
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 -	<p>All sample operating units able to demonstrate the evidence of legal ownership if its lands through possession of land titles which has been owned by Sime Darby Plantations Berhad.</p> <p>For Pertang Estate, sample of land title as per below</p> <table><tr><td>No</td><td>Land title no.</td><td>Lot no.</td></tr><tr><td>1</td><td>CT7xxx</td><td>1xxx</td></tr><tr><td>2</td><td>CT6xxx</td><td>9xx</td></tr><tr><td>3</td><td>9xxx</td><td>3xx</td></tr><tr><td>4</td><td>1xxx</td><td>4xx</td></tr></table> <p><u>Sungei Senarut Estate</u></p> <table><tr><td>No</td><td>Land title no.</td><td>Lot no.</td><td>Hectarage</td></tr><tr><td>1</td><td>5xx</td><td>x</td><td>0.195</td></tr><tr><td>2</td><td>5xx</td><td>x</td><td>0.225</td></tr><tr><td>3</td><td>5xx</td><td>xx</td><td>2.29</td></tr></table>	No	Land title no.	Lot no.	1	CT7xxx	1xxx	2	CT6xxx	9xx	3	9xxx	3xx	4	1xxx	4xx	No	Land title no.	Lot no.	Hectarage	1	5xx	x	0.195	2	5xx	x	0.225	3	5xx	xx	2.29	Complied
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		<table> <tr> <td>4</td><td>6xxx</td><td>xx</td><td>5.60</td></tr> </table> <p><u>Sg Sabaling Estate</u></p> <p>There are total 9 lands titles for Sg. Sabaling Estate with total land area of 1321.91Ha.</p> <table> <tr> <th>No.</th><th>Land title No</th><th>Lot No.</th><th>Hectarage</th></tr> <tr> <td>1</td><td>147xx</td><td>4xx</td><td>93.00</td></tr> <tr> <td>2</td><td>147xx</td><td>4xx</td><td>123.00</td></tr> <tr> <td>3</td><td>147xx</td><td>4xx</td><td>100.00</td></tr> <tr> <td>4</td><td>147xx</td><td>4xx</td><td>1214.00</td></tr> </table>	4	6xxx	xx	5.60	No.	Land title No	Lot No.	Hectarage	1	147xx	4xx	93.00	2	147xx	4xx	123.00	3	147xx	4xx	100.00	4	147xx	4xx	1214.00	
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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>	<p>There is conversion of land from rubber to oil palm has been done for Sungei Senarut Estate and Sg. Sabaling Estate where has been verified within in the certified area. SEIA has been conducted for Sungei Senarut on 22/02/2023 for total area 383.30Ha. While for Sg. Sabaling Estate, SEIA has been done in February 2023 for total land area of 482.03Ha. Both assessments has been done by Puan Atikah bin Hassan, Group sustainability department</p> <p>It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images, The estate's land statement was verified to have no additional changes to the total land area. This was cross checked against the previous year's land statements and MPOB License</p>	Complied																								
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during	There is conversion of land from rubber to oil palm has been done for Sungei Senarut Estate and Sg. Sabaling Estate where has been	Complied																								

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	<p>initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>verified within in the certified area. SEIA has been conducted for Sungei Senarut on 22/02/2023 for total area 383.30Ha. While for Sg. Sabaling Estate, SEIA has been done in February 2023 for total land area of 482.03Ha. Both assessments has been done by Puan Atikah bin Hassan, Group sustainability department</p> <p>It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images, The estate's land statement was verified to have no additional changes to the total land area. This was cross checked against the previous year's land statements and MPOB License</p>	
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>There is conversion of land from rubber to oil palm has been done for Sungei Senarut Estate and Sg. Sabaling Estate where has been verified within in the certified area. SEIA has been conducted for Sungei Senarut on 22/02/2023 for total area 383.30Ha. While for Sg. Sabaling Estate, SEIA has been done in February 2023 for total land area of 482.03Ha. Both assessments has been done by Puan Atikah bin Hassan, Group sustainability department</p> <p>It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images, The estate's land statement was verified to have no additional changes to the total land area. This was cross checked against the previous year's land statements and MPOB License</p>	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p>	<p>There is conversion of land from rubber to oil palm has been done for Sungei Senarut Estate and Sg. Sabaling Estate where has been verified within in the certified area. SEIA has been conducted for Sungei Senarut on 22/02/2023 for total area 383.30Ha. While for Sg. Sabaling Estate, SEIA has been done in February 2023 for total</p>	Complied

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	- Minor compliance -	land area of 482.03Ha. Both assessments has been done by Puan Atikah bin Hassan, Group sustainability department It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images, The estate's land statement was verified to have no additional changes to the total land area. This was cross checked against the previous year's land statements and MPOB License	
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 -	There is conversion of land from rubber to oil palm has been done for Sungei Senarut Estate and Sg. Sabaling Estate where has been verified within in the certified area. SEIA has been conducted for Sungei Senarut on 22/02/2023 for total area 383.30Ha. While for Sg. Sabaling Estate, SEIA has been done in February 2023 for total land area of 482.03Ha. Both assessments has been done by Puan Atikah bin Hassan, Group sustainability department It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images, The estate's land statement was verified to have no additional changes to the total land area. This was cross checked against the previous year's land statements and MPOB License	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 -	There is conversion of land from rubber to oil palm has been done for Sungei Senarut Estate and Sg. Sabaling Estate where has been verified within in the certified area. SEIA has been conducted for Sungei Senarut on 22/02/2023 for total area 383.30Ha. While for Sg. Sabaling Estate, SEIA has been done in February 2023 for total land area of 482.03Ha. Both assessments has been done by Puan Atikah bin Hassan, Group sustainability department	Complied

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4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	<p>There is conversion of land from rubber to oil palm has been done for Sungei Senarut Estate and Sg. Sabaling Estate where has been verified within in the certified area. SEIA has been conducted for Sungei Senarut on 22/02/2023 for total area 383.30Ha. While for Sg. Sabaling Estate, SEIA has been done in February 2023 for total land area of 482.03Ha. Both assessments has been done by Puan Atikah bin Hassan, Group sustainability department</p> <p>It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images, The estate's land statement was verified to have no additional changes to the total land area. This was cross checked against the previous year's land statements and MPOB License</p>	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 -	SDPB developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new development. In case of any dispute, Flowchart and Procedures on Handling Land Disputes dated 1/11/2008 will be used to handle the process. Compensation procedure has been clearly stated in the same procedure as well.	Complied

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4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	SDPB developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new development. In case of any dispute, Flowchart and Procedures on Handling Land Disputes dated 1/11/2008 will be used to handle the process. Compensation procedure has been clearly stated in the same procedure as well.	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	Not applicable since there is no scheme smallholders surrounding the operating units or supplying to Kok Foh POM has been identified for all operating units. This has been confirmed through land title which shows all land has been owned by Sime Darby Plantations Berhad and several interviews conducted with local communities, and neighbouring estate.	Not Applicable
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	Not applicable since there is no customary right lands has been identified for all operating units. This has been confirmed through land title which shows all land has been owned by Sime Darby Plantations Berhad and several interviews conducted with local communities, and neighbouring estate.	Not Applicable
<p>Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	SDPB developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new development. In case of any dispute, Flowchart and Procedures on Handling Land Disputes dated 1/11/2008 will be used to handle the process. Compensation procedure has been clearly stated in the same procedure as well.	Complied

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4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	SDPB developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new development. In case of any dispute, Flowchart and Procedures on Handling Land Disputes dated 1/11/2008 will be used to handle the process. Compensation procedure has been clearly stated in the same procedure as well.	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>	Not applicable since there is no customary right lands has been identified for all operating units. This has been confirmed through land title which shows all land has been owned by Sime Darby Plantations Berhad and several interviews conducted with local communities, and neighbouring estate.	Not Applicable
<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>	Not applicable since there is no customary right lands has been identified for all operating units. This has been confirmed through land title which shows all land has been owned by Sime Darby Plantations Berhad and several interviews conducted with local communities, and neighbouring estate.	Not Applicable
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>	Not applicable since there is no customary right lands has been identified for all operating units. This has been confirmed through land title which shows all land has been owned by Sime Darby Plantations Berhad and several interviews conducted with local communities, and neighbouring estate.	Not Applicable

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4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	Not applicable since there is no customary right lands has been identified for all operating units. This has been confirmed through land title which shows all land has been owned by Sime Darby Plantations Berhad and several interviews conducted with local communities, and neighbouring estate.	Not Applicable
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	Not applicable since there is no customary right lands has been identified for all operating units. This has been confirmed through land title which shows all land has been owned by Sime Darby Plantations Berhad and several interviews conducted with local communities, and neighbouring estate.	Not Applicable
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 -	During the audit, it was verified that Kok Foh Oil Mill has made the current and previous prices of FFBs are publicly available and accessible to the OCP that supplying to the mill. The current FFB price is displayed daily at the weighbridge counter for reference, and the previous prices can be obtained at the weighbridge counter. The prices are based on the MPOB Daily FFB Reference Price Summary by Region.	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 -	On 21/02/2024, Kok Foh SOU Chairman, Kok Foh Mill Manager, and representative from OCP Upstream Business Support held a meeting with Outside Crop Purchase (OCP) to discuss the supply of their FFB to Kok Foh Palm Oil Mill. Among other things discussed is also explains the FFB pricing to the OCP.	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.	Fair pricing, including premium pricing is agreed with smallholders in the supply base and documented. The following contracts were sampled for verification:	Complied

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	- Critical (Major) compliance -	<ul style="list-style-type: none"> OCP EXXXXXXX PXXXXXXX Sdn Bhd (Agreement No. P/C/1123/FFB04564L) – valid from 01/01/2024 until 30/06/2024 OCP CXXXXXX WXXX CXXX Sdn Bhd (Agreement No. P/C/1123/FFB04561L) – valid from 01/01/2024 until 30/06/2024 OCP VX PXXXXXXXXX (X) Sdn Bhd (Agreement No. P/C/1123/FFB04559L) – valid from 01/01/2024 until 30/06/2024 	
5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>On 21/02/2024, Kok Foh SOU Chairman, Kok Foh Mill Manager, and representative from OCP Upstream Business Support held a meeting with Outside Crop Purchase (OCP) to discuss the supply of their FFB to Kok Foh Palm Oil Mill. Currently The OCPs supplied the FFBs to the mill are outgrowers and collection centres only and no independent smallholders supply their FFBs to the palm oil mill.</p> <p>During the meeting, various topics were addressed, including discussions on FFB pricing and initiatives to improve bin and transport arrangements, as well as mopping and segregation exercises. The primary objective of these discussions is to attract and ensure consistent FFB supply from the OCPs. Notably, there were no requests from the OCPs for financial assistance, loans/credits, or repayments through FFB price reductions for replanting or other support mechanisms. The Malaysian Government via MPOB has allocated subsidies for replanting activities, particularly for outgrowers and independent smallholders, eliminating the need for such requests.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	During the audit, evidence was found that Kok Foh Oil Mill engage in fair and transparent dealings with their OCPs. Sampled contracts were sighted, which contained provisions related to the contract	Complied

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		<p>duration, rights and obligations of the parties involved, as well as the rates payable and agreed terms of payment. Sampled contracts were signed with the following OCPs:</p> <ul style="list-style-type: none"> • OCP EXXXXXXX PXXXXXXX Sdn Bhd (Agreement No. P/C/1123/FFB04564L) – valid from 01/01/2024 until 30/06/2024 • OCP CXXXXXX WXXX CXXX Sdn Bhd (Agreement No. P/C/1123/FFB04561L) – valid from 01/01/2024 until 30/06/2024 • OCP VX PXXXXXXXXX (X) Sdn Bhd (Agreement No. P/C/1123/FFB04559L) – valid from 01/01/2024 until 30/06/2024 	
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>During the audit, evidence was found to support the timely payments made by Kok Foh Oil Mill to the OCPs. The following information was sighted:</p> <ul style="list-style-type: none"> • OCP EXXXXXXX PXXXXXXX Sdn Bhd (Agreement No. P/C/1123/FFB04564L) – valid from 01/01/2024 until 30/06/2024. Refer payment for the month of January 2024 and February 2024. • OCP CXXXXXX WXXX CXXX Sdn Bhd (Agreement No. P/C/1123/FFB04561L) – valid from 01/01/2024 until 30/06/2024. Refer payment for the month of January 2024 and February 2024. • OCP VX PXXXXXXXXX (X) Sdn Bhd (Agreement No. P/C/1123/FFB04559L) – valid from 01/01/2024 until 30/06/2024. Refer payment for the month of January 2024 and February 2024. 	Complied

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		The availability of purchase orders, invoices, payment vouchers, and the confirmation of stakeholders during the interview confirmed that agreed payments were made in a timely manner by Kok Foh Oil Mill to the OCPs, ensuring fair and prompt compensation for their services.	
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 -	Each of the weighbridges situated at the Operating Unit of SOU 16 Kok Foh Oil Mill & Supply Bases has been calibrated on annual basis by weighing and measuring equipment verification service provider which was appointed by the Federal Government of Malaysia through Ministry of Domestic Trade and Consumer Affairs (KPDNHEP) under Akta Timbang dan Sukat 1972. Evident the D Form and Calibration Report for each of the weighbridges as below: <ul style="list-style-type: none"> Serial No: D167324 Sticker No: DE1800XXXX Date of inspection: 20/07/2023 Inspected by: De Metrology.	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	Independent Smallholders is not part of the OCPs that supplying FFBs to Kok Foh Palm Oil Mill. Thus, this specific requirement cannot be subject to further assessment during the current audit. Nevertheless, within the broader scope of Sime Darby Plantation's (SDP), as highlighted in SDP's 2021 Sustainability Report, the company explicitly articulates its commitment to supporting Independent Smallholders with certification. This commitment extends beyond Malaysia and encompasses regions such as Indonesia, Papua New Guinea, and the Solomon Islands. On the region basis communication on supports Independent Smallholders with certification has been given during stakeholder meeting. Refer minutes of meeting dated 06/02/2024.	Complied

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5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>The grievance mechanism was duly addressed in the Standard Operation Manual dated 1/11/2008, which comprehensively documented the procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2) specifically for grievance handling.</p> <p>However, Independent Smallholders is not part of the OCPs that supplying FFBs to Kok Foh Palm Oil Mill. Thus, this specific requirement cannot be subject to further assessment during the current audit.</p>	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	<p>The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>On 21/02/2024, SOU 16 Chairman, Kok Fohn Mill Manager, and representative from OCP Upstream Business Support held a meeting with Outside Crop Purchase (OCP) to discuss the supply of their FFB to Kok Foh Palm Oil Mill. Among other things discussed is also explains the FFB pricing to the OCP and their feedback on the proposed initiative for bin and transport arrangement and mopping/segregation exercise.</p>	Complied
5.2.2	<p>The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).</p> <p>- Minor compliance -</p>	<p>On 21/02/2024, SOU 16 Chairman, Kok Fohn Mill Manager, and representative from OCP Upstream Business Support held a meeting with Outside Crop Purchase (OCP) to discuss the supply of their FFB to Kok Foh Palm Oil Mill. Among other things discussed is also explains the FFB pricing to the OCP and their feedback on the proposed initiative for bin and transport arrangement and mopping/segregation exercise.</p>	Complied
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>Throughout the audit process, it was ascertained that Kok Foh Oil Mill meticulously verifies the validity of the MPOB License for each FFBs supplier, including owned supply bases, SDP owned estates, and OCPs. The issuance of the license is the responsibility of MPOB, a government agency entrusted with serving the country's oil palm industry. The licensing process is governed by the Malaysian Palm</p>	Complied

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		<p>Oil Board (Licensing) Regulations 2005, under the Malaysian Palm Oil Board Act 1998. This ensures that every FFB received by the mill is in compliance with the regulations set by the Malaysian Government.</p> <p>Additionally, the Malaysian Government mandates that every FFB producer in the country be certified with MSPO (Malaysian Sustainable Palm Oil) certification.</p> <p>The combination of MPOB licensing and MSPO certification demonstrates that Kok Foh Oil Mill and its FFB suppliers operate in accordance with the regulations and standards set by the Malaysian Government for the palm oil industry.</p>	
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>On 21/02/2024, SOU 16 Chairman, Kok Foh Mill Manager, and representative from OCP Upstream Business Support held a meeting with Outside Crop Purchase (OCP) to discuss the supply of their FFB to Kok Foh Palm Oil Mill. Among other things discussed is also explains the FFB pricing to the OCP and their feedback on the proposed initiative for bin and transport arrangement and mopping/segregation exercise. However, Independent Smallholders is not part of the OCPs that supplying FFBs to Kok Foh Palm Oil Mill. Thus, this specific requirement cannot be subject to further assessment during the current audit.</p>	Complied
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>Independent Smallholders is not part of the OCPs that supplying FFBs to Kok Foh Palm Oil Mill. Thus, this specific requirement cannot be subject to further assessment during the current audit.</p> <p>Nevertheless, within the broader scope of Sime Darby Plantation's (SDP), as highlighted in SDP's 2021 Sustainability Report, the company explicitly articulates its commitment to supporting Independent Smallholders with certification. This commitment extends beyond Malaysia and encompasses regions such as Indonesia, Papua New Guinea, and the Solomon Islands.</p>	Complied

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Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
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>	Documented in the human right charter revised in year 2020 which clearly stated that Sime Darby Plantation Berhad will not tolerate 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. As per verification for each operating units, there is evidence that there is no discrimination has been practices. Foreign workers from different origin, different gender has been treated equally and has been given same opportunities. This has been verified by the auditor through interview with the workers from different origin, races, gender.	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>	There is evidence that there are no parties has been discriminated by the management where it has been confirmed through interview, site visit and records review. Sample has been taken for women workers where they have been treated equally as other workers where there has been paid equally with other workers which work as same job scope and entitle with the same benefits. All foreign workers have been allocated at the same housing compound and received same benefits regardless of the origin. There are no recruitment fees has been charged to all foreign workers that has been recruited in year 2023. It has been confirmed through interview with the new recruited workers.	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	There is evidence that operating units has demonstrate that recruitment base on capabilities and qualities which has been verified during the interview by the operating units and for foreign workers at the origin countries. Sample of 12 workers has been taken from different origin countries, races and gender and has	Complied

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		been verified based on interview, and documentation such as medical checkup and interview records.	
6.1.4	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. - Minor compliance -	There is no pregnancy test has been done in all operating units. It has been confirmed through interview with Hospital Assistant and female workers. If there is any cases of delaying on menstrual, hospital assistant will advised the female workers to conducted test to nearest government health clinic.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	Guideline for establishing gender committee documented in "Gender Committee Guidelines" year 2024 revision 02 which outline the process of gender committee establishment including structure, roles & responsibilities and gender committee meeting and activities. Stated also related to reporting of sensitive issues clause 4.1, in the event of GC chair or any of the GC members receive complaints/grievances or incident of sensitive nature such as case to sexual harassment, domestic abuse and children in the OU, gender committee chair shall report to the OU manager directly for his next actions to report to the regional HR Manager. For Kok Foh POM and Kok Foh Estate, gender committee has been established combine for both OU and Madam Kamalan Nadarajan has been appointed as gender committee chairman. Sighted latest meeting 20/03/2024 and 20/12/2023 which has discussed issues related to housing condition, gender committee activities etc. While for Pertang Estate, sighted gender committee has been established which has been chaired by Puan Norleza binti Shamsuddin and latest meeting has been conducted on 11/04/2024 and 11/01/2024. Several issues have been discussed such as ant	Complied

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		<p>and midge issues at the housing compound. Sighted that the gender committee has conducted several activities in order to improve women such as fire drill for housewife, Ramadhan month celebration including Bubur Lambuk cooking class.</p> <p>For Sungei Senarut Estate, the gender committee has been established and meeting has been conducted on 19/01/2024 and 29/04/2024 where communication of the policy and awareness of sexual harassment has been conducted. There is several activities has been done such 1st aid training, bowling tournament.</p> <p>Gender committee for Sg Sabaling Estate has been chaired by Puan Suzila Sulong which has been nominated by all other committee during the meeting on 16/01/2024. Meeting has been conducted every 3 months and latest meeting conducted on 15/04/2024</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>There is evidence that all workers have been paid according to minimum wages order 2022 and as per collective agreement with MAPA NUPW. It has been confirmed with through interview with sample workers and pays documentation such as pay slips, punch card for Month March'24, April'24 and December'23</p>	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	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Collective agreement between Sime Darby Plantations Berhad and national union of plantation workers (NUPW) for Palm Oil Mill Employees, 2020 registered 09/03/2020 valid until December 2022 reference number COG. NO: 057/2020. Other than all operating units complies with Minimum Wage Order 2022 at rate RM1500/months, RM57.69/day or RM7.21/hour</p>	Complied
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal</p>	<p>Payment details and employment terms are clearly outlined and formally recorded in employment contracts provided to all employees. These contracts encompass various aspects, such as the employment duration, working hours, overtime policies, annual and</p>	Complied

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	<p>requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>medical leave entitlements, public holiday arrangements, mutual termination provisions, maternity benefits, and more. Importantly, these terms are in strict adherence to the Employment Act of 1955, the Minimum Wages Order of 2020, the SOCSO Act of 1969, the EPF Act of 1991, the EIS Act of 2017, and the MAPA/NUPW agreement.</p> <p>Additionally, payroll documents, specifically payslips, provide accurate and comprehensive information regarding compensation for all labour performed. This encompasses individuals receiving daily rated wages, piece-rated wages, payments for any overtime work, and remuneration for public holidays. Furthermore, our examination of sampled payslips confirms that all wages were disbursed in full compliance with the applicable national legal requirements. Salary deductions and overtime payments align with the stipulations of the relevant laws, including SOCSO, EPF, EIS, and are also in accordance with Labor Office permits.</p> <p>Stated in the employment contract working hours, deduction, overtime and leave entitlement. Mentioned in the employment contract that entitlement of leave is depending on the length of service. For workers less than 2 years services, they are entitled for 14 days of sick leave and 8 days of annual leave. Highlighted in the contract reasons for dismissal, period of notice and other legal labour requirements.</p>	
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>Sample of workers has been taken by the auditor for each operating units to verify the compliance of legal requirement and as per employment contract. Verification has been done through pay slips, employment contract, punch cards, check roll book and confirmation through interview with sample workers where there is evidence that the management for each operating units complies with legal requirement as per stipulated in the indicator 6.1.1</p>	Complied

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6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of 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>There is evidence that all operating units has been provided adequate housing to all workers at the workers housing complex with 2 rooms, toilet, shower area, dining hall and kitchen. For operating units that has insufficient housing, the management has paid RM125.00/person/month as housing allowance and align with MAPA-NUPW agreement. Waters has been supplied through water treatment plans for Kok Foh POM and Kok Foh estate, while for other estate it has been supplied through government water supplies (either SAINS or SAJ) while for electricity through Tenaga Nasional Berhad (TNB). The management has provided transport to school for kids free. There is sport facilities as been established such as football field and badminton court and worship area such as surau and temple. All operating units has appointed their own hospital assistant with sufficient equipment clinic to treat workers. Linesite inspection has been conducted on weekly basis by the hospital assistant and VMO visit has been done every 2 weeks.</p> <p>Sample of VMO visit has been taken and verified as per below</p> <p>Kok Foh Estate: 09/05/2024 and 16/05/2024</p> <p>Pertang Estate: 08/04/2024, 28/04/2024 and 16/05/2024</p> <p>Sg. Sabaling Estate: 09/05/2024 and 23/05/2024</p> <p>Sungei Senarut Estate</p> <ol style="list-style-type: none"> 1. Worker's housing inspection was done by hospital assistant (HA) on weekly basis and latest inspection carried out on 07/05/2024 and 14/05/2024 where it has identified delayed of grass cutting in both inspections. Verified during site visit on 23/05/2024, the issue has not yet rectified and still pending. 2. Observed during site visit, sighted clogged collection drain which resulting from waste generated from the workers housing basin. This issue has not been identified in the latest line site inspection. 	Non-compliance
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		This is against the requirement in the Section 23 (1)(b) It shall be the duty of the employer of a place of employment where employees and their dependents are provided with housing accommodation to ensure that— the perimeter drains around each dwelling or block of dwellings including all outlet drains are kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water. Thus, a major Nc was issued.	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	There are sundry shops for all operating units which has been established and rented to 3 rd parties. As per verification, Kok Foh POM and Kok Foh Estate, there are 1 sundry shop and 2 canteens. Line site also located nearby the Kampung Gelle where there is sundry shops available to choose. While for Pertang Estate and Sungai Sabaling Estate, there is one sundry shops. Monitoring of pricing has been done by the management where it has been verified during the site visit that the price of food is affordable.	Complied
6.2.6	A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE 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).	Sime Darby Plantation Berhad – SOU 16 Kok Foh POM and supply bases has provided the decent living wage for both local and foreign workers based on PREVAILING WAGES assessment. The assessment has been done which the data has been verified form the checkroll-worker for period of January 2024, checkroll-operating unit for period of Jan-Dec 2023 (calculation is RMxx/12), HR-fixed and denominator of total head count. Total workers for SOU16- Kok Foh POM and supply bases is 915 workforces, with composition 204 local workers and 551 foreign workers. The assessment has included wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc. in the calculation.	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>	<p>It has been verified by auditor base on the sample payslips for each operating units showed that the salary received complied with the minimum wage order 2020 and 2022</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>As per verification, for all the operating units that has been sample, all the workers has been recruited as permanent workers which come from Malaysia, Indonesia, India, Bangladesh and Nepal.</p>	Complied

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	certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal - Minor compliance -	Contractor has been appoint for other job such as FFB transport, grass cutting, hiring machineries, and waste collection.	
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.			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>There is no changes compare to last year where SDPB adopt the same Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 with no changes on the policy which is 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> <ol style="list-style-type: none"> 1. Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. 2. Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. 3. Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively. <p>During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union. Sighted list of workers that already registered as NUPW member and records memberships payments.</p> <p>Pertang Estate: 08/01/2024</p>	Complied

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		<p>Kok Foh POM: 12/02/2024 for POM workers and 18/05/2024 for contract workers</p> <p>Kok Foh Estate: 12/08/2023</p> <p>Sg Senarut Estate: 21/03/2024 (Sungai Gemas Division) and 28/03/2024 (Main division)</p> <p>Sg. Sabaling Estate: 16/03/2024</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Minutes meeting has been made available for all operating units which has been conducted through social dialogue on monthly basis and the minutes meeting been classified as publicly available. There is evidence that the meeting has been attended by workers representative that has been elected by workers from the same origin countries. Details of social dialogue meeting that has been done on monthly basis as per below</p> <p>Pertang Estate: 14/12/2023, 24/01/2024, 16/02/2024, 28/03/2024, Kok Foh POM: 15/02/2024, 11/03/2024 and 19/04/2024</p> <p>Kok Foh Estate: 29/02/2024, 29/03/2024, 26/04/2024</p> <p>Sg. Senarut Estate: 26/02/2024, 30/03/2024 and 26/04/2024</p> <p>Sg. Sabaling Estate: 17/01/2024, 15/02/2024, 11/03/2024 and 16/04/2024</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Election of workers has been done through WhatsApp's which has been handle by Regional support services and will be calculate and summarized. The outcome will be submitted social welfare services and appointment letter will be provided. There is evidence representative from different origin countries, gender has been elected for both operating units.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			

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6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>There is no changes compare to last year where SDPB adopted Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 with no changes on the policy which is 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> <ol style="list-style-type: none"> 1.Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. 2.Respecting Freedom of Association: We respect the rights of employees to join and form organizations of their own choice and to bargain collectively. 3.Ensuring Favorable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations. 4.Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the wellbeing of our communities. 5.Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognize that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use. 6.Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalized groups, persons of different abilities and refugees. 7.Protecting the Rights of Children: We seek to promote the wellbeing of children and safeguard them from any form of 	Complied
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		<p>maltreatment or exploitation, including child sex tourism, child trafficking, child labor and child pornography.</p> <p>8. Review of workers master list, interview and site visit confirmed that there is no workers below than 18 years old</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>As per verification through sample of workers from different categories which are origin countries, gender, types of workers found that there are no workers below than minimum ages has been recruited. It has been verified based on master list, personal file and interview by the workers itself. Procedure for age screening has been established for both migrant and local workers in the recruitment procedure.</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There is compliance to Human Right Charter which clearly stated the management commitment in clause 3.3 Respect and Uphold Children's Rights 3.3.1 Eradicating child labour in our supply chain. SDPB will not employ anyone under the age of 18 years. Review of workers master list, interview and site visit confirmed that there is no workers below than 18 years old has been recruited.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>All operating units under SOU 16- Kok Foh POM able to demonstrate communication on no child labour policy which has been documented in Human Right Charter which clearly stated the management commitment in clause 3.3 Respect and Uphold Children's Rights 3.3.1 Eradicating child labour in our supply chain which has been conducted during the stakeholder meetings. As per interview, all stakeholders can demonstrate their understanding on the policy and procedure. Detail of stakeholders meeting conducted as per below.</p> <p>Pertang Estate: 15/02/2024 Kok Foh POM/ Kok Foh Estate/ Sg. Sabaling Estate: 16/02/2024</p>	Complied

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		Sg Senarut Estate: 07/02/2024	
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes compare to last year where Sime Darby Plantations Berhad adopt the Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>Stated in the policy that the management committed to respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ol style="list-style-type: none"> 1. Eliminating Violence and Sexual Harassment: 2. Eradicating any form of Exploitation <p>There are no cases of any harassment that has been identified and happen in all operating units which has been confirmed based on interview with the workers.</p> <p>Communication of the policy sighted based on briefing records for each operating units and further verified based on interview with the stakeholders and workers which can demonstrate their understanding on the policy that has been established. Details as per below</p> <p>Pertang Estate: 08/01/2024 Kok Foh POM: 12/02/2024 for POM workers and 18/05/2024 for contract workers Kok Foh Estate: 12/08/2023 Sungei Rakyat Estate: 21/03/2024 (Sungai Gemas Division) and 28/03/2024 (Main division) Sg. Sabaling Estate: 16/03/2024</p>	Complied

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6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Stated in the human right charter year 2020, commitment of Sime Darby Plantation Berhad in protecting reproductive right and has been clearly outline in clause 3.2.5. There is evidence that the policy has been implemented where there is no restriction by the management for pregnancy and there is no pregnant/breastfeeding women handling with chemical. It has been further confirmed through interview with the female workers.</p> <p>Communication of the policy sighted based on briefing records for each operating units and further verified base on interview with the stakeholders and workers which can demonstrate their understanding on the policy that has been established. Details as per below</p> <p>Pertang Estate: 08/01/2024 Kok Foh POM: 12/02/2024 for POM workers and 18/05/2024 for contract workers Kok Foh Estate: 12/08/2023 Sg Senarut Estate: 21/03/2024 (Sungai Gemas Division) and 28/03/2024 (Main division) Sg. Sabaling Estate:16/03/2024</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>New mother assessment has been done for each female workers with infants under 24 months by the gender committee.</p> <p>For Sg Senarut Estate, there new mother assessment has conducted on 01/01/2024 for one of the offices delivered in March 2023, and there is no special needs has been requested.</p> <p>While for Pertang Estate conducted on 05/02/2024 for office clerk and she requested to allow for schedule break to home for breast pump and to all time for post-natal and monthly checks.</p>	Complied

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		There is no new mother has been identified in Sg. Sabaling Estate.	
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 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>Interview conducted on-site with sampled internal stakeholders among all workforce confirmed that the information on grievance mechanism, which respects anonymity and protects complainants where requested, is established, and communicated to them.</p> <p>No grievance issues that require the implementation of the mechanism occurs in all operating units within SOU 16-Kok Foh POM since the last audit.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	(C) All workers have entered into employment voluntarily and the following are prohibited:	Based on interviews with the workers, and observations made, the following were verified:	Complied

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	<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>a. Retention of documents: All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. Some Indonesian workers has been interviewed and confirmed that passport has been kept by the workers itself. It has been confirmed during site visit to line site where verification passport has been kept at their house.</p> <p>b. Charging of recruitment fee: Workers are not charged any recruitment fees. Interviews conducted with workers also confirmed that they have not been charged any recruitment fees.</p> <p>c. Involuntary overtime: Based on interviews conducted with the workers, all overtime work was carried out on a voluntary basis. Workers are free to decline any offers for overtime work. Sighted written consent from workers to work overtime for Kok Foh POM and estates.</p> <p>d. Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. This was confirmed during interviews with workers. There is no term and condition for any resignation and the flight tickets will bear by the operating units.</p> <p>e. Debt bondage: There is no evidence of any incidence of debt bondage. It has been verified based on sample of pay slips where there is no deduction of salary for debt. Further verification has been done through interview where there is no loan/borrowing money has been given by the management to the workers. The is also no recruitment fee has been charged to the workers hence confirmed that there is debt bondage implement.</p>	
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		Withholding of wages: There is no evidence of withholding of wages. Workers' wages have been paid by account and can be withdraw at the nearest bank and sighted evidence of payment that has been signed by the workers. There is evidence that there no workers' wages have been withheld. It has been further confirmed through interview.	
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>There are migrant workers has been recruited from India, Nepal Indonesia and Bangladesh to work in SOU16- Kok Foh POM and supply bases.</p> <p>As a commitment to manage migrant workers in a good manner and compliance to the requirement Sime Darby Plantations Berhad has adopted Sime Darby's Human Rights Charter, wherein they have made the following commitments:</p> <ul style="list-style-type: none"> a. Ensuring equal opportunities for all. b. Respecting the freedom of association. c. Eradicating any manifestations of exploitation. d. Ensuring the provision of favorable working conditions. e. Enhancing safety and health measures. <p>As per verification, there is evidence that the policy has been implemented where each process of recruitment has been done such as signing employment contract, interview and consultation with migrant workers at origin countries and One Stop Centre. As per interview, it has been confirmed that all facilities and benefits has been provided equally for all foreign workers. Passport has been kept by the workers itself. There is no evidence of contract substitution where all migrant workers have been explained the content of the employment contract at the origin countries. It has been confirmed through interview with the workers itself.</p>	Complied
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			

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6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate/Mill Manager. The mill and estates manager has been appointed as person responsible for safety and health cum chairman for safety and health as per Appointment letter dated 02/01/2023 by Regional Chief Executive Officer Central East Region. All correspondence were sighted and verified. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report, workplace inspection, and training. Concerns on issue related health, safety and welfare were discussed at these meetings and recorded. The OSH Committee meeting for Estate was conducted on quarterly basis. Reviewed the latest minutes meeting FY 2024 and FY2023 as follows:</p> <table><tr><td>OSH Meeting 2024</td><td>Kok Foh Estate</td><td>Pertang Estate</td></tr><tr><td>1st Quarter</td><td>13/03/2024</td><td>11/03/2024</td></tr><tr><td>2nd Quarter</td><td>TBC</td><td>TBC</td></tr><tr><td>OSH Meeting 2023</td><td></td><td></td></tr><tr><td>4th Quarter</td><td>15/12/2023</td><td>18/12/2023</td></tr><tr><td>3rd Quarter</td><td>15/09/2023</td><td>11/03/2024</td></tr></table> <table><tr><td>OSH Meeting 2024</td><td>Sg Senarut Estate</td><td>Sg Sabaling Estate</td></tr></table>	OSH Meeting 2024	Kok Foh Estate	Pertang Estate	1 st Quarter	13/03/2024	11/03/2024	2 nd Quarter	TBC	TBC	OSH Meeting 2023			4 th Quarter	15/12/2023	18/12/2023	3 rd Quarter	15/09/2023	11/03/2024	OSH Meeting 2024	Sg Senarut Estate	Sg Sabaling Estate	Complied
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		<table><tr><td>1st Quarter</td><td>14/03/2024</td><td>09/02/2024</td></tr><tr><td>2nd Quarter</td><td>TBC</td><td>06/05/2024</td></tr><tr><td>OSH Meeting 2023</td><td></td><td></td></tr><tr><td>4th Quarter</td><td>10/12/2023</td><td>09/11/2023</td></tr><tr><td>3rd Quarter</td><td>12/09/2023</td><td>10/08/2023</td></tr></table> <table><tr><td>OSH Meeting 2024</td><td>Kok Foh POM</td></tr><tr><td>1st Quarter</td><td>19/02/2024</td></tr><tr><td>2nd Quarter</td><td>TBC</td></tr><tr><td>OSH Meeting 2023</td><td></td></tr><tr><td>4th Quarter</td><td>27/11/2023</td></tr><tr><td>3rd Quarter</td><td>25/08/2023</td></tr></table> <p>Workplace inspections are made prior to the ESH meeting. Latest workplace inspection was conducted on the month of February and April 2024.</p>	1 st Quarter	14/03/2024	09/02/2024	2 nd Quarter	TBC	06/05/2024	OSH Meeting 2023			4 th Quarter	10/12/2023	09/11/2023	3 rd Quarter	12/09/2023	10/08/2023	OSH Meeting 2024	Kok Foh POM	1 st Quarter	19/02/2024	2 nd Quarter	TBC	OSH Meeting 2023		4 th Quarter	27/11/2023	3 rd Quarter	25/08/2023	
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6.7.2	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	Refer Emergency Preparedness & Response Procedures dated 17/11/2021 with reference number UM/HSE/SP/02. 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	Non-compliance																											

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	<p>equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>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> <table><tr><th>Estate/ Mill</th><th>ERP Training date</th></tr><tr><td>Kok Foh Estate</td><td>13/05/2024</td></tr><tr><td>Kok Foh POM</td><td>13/05/2024</td></tr><tr><td>Pertang Estate</td><td>15/05/2024</td></tr><tr><td>Sg Senarut Estate</td><td>20/02/2024</td></tr><tr><td>Sg Sabaling Estate</td><td>21/12/2023</td></tr></table> <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. Latest inspection as follows:</p>	Estate/ Mill	ERP Training date	Kok Foh Estate	13/05/2024	Kok Foh POM	13/05/2024	Pertang Estate	15/05/2024	Sg Senarut Estate	20/02/2024	Sg Sabaling Estate	21/12/2023	
Estate/ Mill	ERP Training date														
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Sg Senarut Estate	20/02/2024														
Sg Sabaling Estate	21/12/2023														

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		<table><tr><th>Estate/ Mill</th><th>First Aid Training date</th><th>Latest First Aid Monitoring Record</th></tr><tr><td>Kok Foh Estate</td><td>04/04/2024</td><td>16/05/2024</td></tr><tr><td>Kok Foh POM</td><td>17/05/2024</td><td>16/05/2024</td></tr><tr><td>Pertang Estate</td><td>13/05/2024</td><td>20/05/2024</td></tr><tr><td>Sg Senarut Estate</td><td>10/05/2024</td><td>04/05/2024</td></tr><tr><td>Sg Sabaling Estate</td><td>17/05/2024</td><td>16/05/2023</td></tr></table>	Estate/ Mill	First Aid Training date	Latest First Aid Monitoring Record	Kok Foh Estate	04/04/2024	16/05/2024	Kok Foh POM	17/05/2024	16/05/2024	Pertang Estate	13/05/2024	20/05/2024	Sg Senarut Estate	10/05/2024	04/05/2024	Sg Sabaling Estate	17/05/2024	16/05/2023	
Estate/ Mill	First Aid Training date	Latest First Aid Monitoring Record																			
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		<p><u>Kok Foh POM</u></p> <p>Accident records were maintained and updated monthly at the mill. The JKKP 8 form have been submitted for the year ending 2023 on 05/01/2024 with reference number JKKP8/154734/2023. Amended report has been sent on 03/05/2024 with reference number JKKP8/183869/2023. There were 13 accidents recorded with 267 days TLA.</p> <p><u>Kok Foh Estate</u></p> <p>Accident records were maintained and updated monthly at the estate. The JKKP 8 form have been submitted for the year ending 2023 on 06/01/2024 with reference number JKKP8/156872/2023. Amended report has been sent on 20/03/2024 with reference number JKKP8/183414/2023. There were 6 accidents recorded with 16 days TLA.</p> <p><u>Pertang Estate</u></p> <p>Accident records were maintained and updated monthly at the estate. The JKKP 8 form have been submitted for the year ending</p>																			

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		<p>2023 on 29/01/2024 with reference number JKKP8/161493/2023. There were 3 accidents recorded with 10 days TLA.</p> <p><u>Sg Senarut Estate</u></p> <p>Accident records were maintained and updated monthly at the estate. The JKKP 8 form have been submitted for the year ending 2023 on 13/01/2024 with reference number JKKP8/159560/2023. Amended report has been sent on 26/04/2024 with reference number JKKP8/183894/2023. There were 2 accidents recorded with 50 days TLA.</p> <p><u>Sg Sabaling Estate</u></p> <p>Accident records were maintained and updated monthly at the estate. The JKKP 8 form have been submitted for the year ending 2023 on 11/01/2024 with reference number JKKP8/181195/2023. Amended report has been sent on 29/03/2024 with reference number JKKP8/183586/2023. There were 1 accident recorded with 90 days TLA.</p> <p><u>Minor NC</u></p> <p>First Aid box procedures was not fully implemented.</p> <p><u>Sg Senarut Estate</u></p> <p>During site inspection at P21A Scout Harvesting operation, the first aid box was not available. Based on interview confirmed that mandore has attended First Aid training but yet to be issued with the First Aid box. It was not in line with First Aid in Workplace Procedures Section 7.1.2 For estate operation the additional travel first aid kit is advisable to bring along by the appointed First Aider / PIC to the field or worksite such as mandora, field supervisor etc.</p>	
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		<p><u>Pertang Estate</u></p> <p>During site inspection at P15 A harvesting area, checking on the first aid box found 1 item (Triangular bandage) was expired on 19/11/2022. Inspection on the first aid box latest on May 2024.</p> <p>It was not in line with First Aid in Workplace Procedures Section 7.3.3 It is essential that first aid boxes be checked frequently so as to make sure they are fully equipped, no expired product and all items are usable.</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>Refer PPE Issuance record for the year 2024. Based on the HIRARC carried out at the estates/mill the PPE types for the various activities has been identified and implemented.</p> <table><tr><td>Category</td><td>PPE provided</td></tr><tr><td>Tractor Driver</td><td>Safety Helmet, Safety Shoes, Ear Plug, Safety Vest.</td></tr><tr><td>Sprayers</td><td>Respirator, nitrile glove, goggles, wellington boots, apron.</td></tr><tr><td>Manuring</td><td>Apron, wellington boots, dust mask, nitrile glove.</td></tr><tr><td>Harvester</td><td>Safety helmet, Goggle, sickle cover, hand glove, wellington boots</td></tr></table> <p>Similarly, the mill issued PPE to its employees for their protection at workplace. Records of PPE issued are maintained individually to all employees. PPE issued to the workers is safety helmets, safety</p>	Category	PPE provided	Tractor Driver	Safety Helmet, Safety Shoes, Ear Plug, Safety Vest.	Sprayers	Respirator, nitrile glove, goggles, wellington boots, apron.	Manuring	Apron, wellington boots, dust mask, nitrile glove.	Harvester	Safety helmet, Goggle, sickle cover, hand glove, wellington boots	Complied
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		<p>shoes. Special PPE for workers assigned to height, confined space. Safety shoes issued on a 6 monthly basis and recorded.</p> <table><tr><th>Category</th><th>PPE provided</th></tr><tr><td>Mill operator</td><td>Safety boots, earmuff, safety vest, helmet, cotton glove</td></tr><tr><td>Water treatment Plant Operator</td><td>Safety boots, earmuff, safety vest, helmet, cotton glove, dust mask.</td></tr><tr><td>Workshop</td><td>Safety Helmets, Goggles, Leather Gloves, safety Shoes.</td></tr></table> <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>	Category	PPE provided	Mill operator	Safety boots, earmuff, safety vest, helmet, cotton glove	Water treatment Plant Operator	Safety boots, earmuff, safety vest, helmet, cotton glove, dust mask.	Workshop	Safety Helmets, Goggles, Leather Gloves, safety Shoes.	
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Workshop	Safety Helmets, Goggles, Leather Gloves, safety Shoes.										
6.7.4	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.	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	Complied								

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	<p>- Minor compliance -</p>	<p>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.</p> <p>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"> <thead> <tr> <th>Operating Units</th><th>Month</th><th>Total Workers</th><th>Amount</th></tr> </thead> <tbody> <tr> <td rowspan="2">Kok Foh Estate</td><td>Jan 2024</td><td>183</td><td>RMX,XXX.XX</td></tr> <tr> <td>March 2024</td><td>176</td><td>RMX,XXX.XX</td></tr> <tr> <td rowspan="2">Kok Foh POM</td><td>Jan 2024</td><td>113</td><td>RMX,XXX.XX</td></tr> <tr> <td>March 2024</td><td>115</td><td>RMX,XXX.XX</td></tr> <tr> <td rowspan="2">Pertang Estate</td><td>Jan 2024</td><td>115</td><td>RMX,XXX.XX</td></tr> <tr> <td>March 2024</td><td>113</td><td>RMX,XXX.XX</td></tr> <tr> <td rowspan="2">Sg Senarut Estate</td><td>Jan 2024</td><td>93</td><td>RMX,XXX.XX</td></tr> <tr> <td>March 2024</td><td>88</td><td>RMX,XXX.XX</td></tr> <tr> <td rowspan="2">Sg Sabaling Estate</td><td>Jan 2024</td><td>55</td><td>RMX,XXX.XX</td></tr> <tr> <td>March 2024</td><td>54</td><td>RMX,XXX.XX</td></tr> </tbody> </table>	Operating Units	Month	Total Workers	Amount	Kok Foh Estate	Jan 2024	183	RMX,XXX.XX	March 2024	176	RMX,XXX.XX	Kok Foh POM	Jan 2024	113	RMX,XXX.XX	March 2024	115	RMX,XXX.XX	Pertang Estate	Jan 2024	115	RMX,XXX.XX	March 2024	113	RMX,XXX.XX	Sg Senarut Estate	Jan 2024	93	RMX,XXX.XX	March 2024	88	RMX,XXX.XX	Sg Sabaling Estate	Jan 2024	55	RMX,XXX.XX	March 2024	54	RMX,XXX.XX	
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6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKKP 8 form were submitted to DOE through MyKKP systems. Occupational Injuries were recorded as below: <table><tr><th rowspan="2">Operating Unit</th><th colspan="2">2023</th><th rowspan="2">Hours worked</th><th rowspan="2">Average Workers</th></tr><tr><th>Cases</th><th>TLA</th></tr><tr><td>Kok Foh Estate</td><td>6</td><td>16</td><td>453,600</td><td>189</td></tr><tr><td>Kok Foh POM</td><td>13</td><td>367</td><td>264,576</td><td>106</td></tr><tr><td>Pertang Estate</td><td>3</td><td>10</td><td>247,104</td><td>94</td></tr><tr><td>Sg Senarut Estate</td><td>2</td><td>50</td><td>346,750</td><td>119</td></tr><tr><td>Sg Sabaling Estate</td><td>1</td><td>90</td><td>166,914</td><td>70</td></tr></table>	Operating Unit	2023		Hours worked	Average Workers	Cases	TLA	Kok Foh Estate	6	16	453,600	189	Kok Foh POM	13	367	264,576	106	Pertang Estate	3	10	247,104	94	Sg Senarut Estate	2	50	346,750	119	Sg Sabaling Estate	1	90	166,914	70	Complied
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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	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	The estates have developed Integrated Pest Management (IPM) plans to effectively control pests and reduce chemical usage. Here are the plans established for estates: <ul style="list-style-type: none">Planting beneficial plants extensively in immature areas.Implementing IPM planting of beneficial plants in areas prone to bagworm attacks.Conducting IPM bagworm refreshment training.	Complied																																

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		<ul style="list-style-type: none"> Following calendar baiting religiously as per the programmed schedule. Monitoring owl population through census every 6 months. Expediting the establishment of beneficial plants for integrated pest management. 	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>None of the plant species mentioned, which are referenced in the Global Invasive Species Database and CABI.org, are utilized in their IPM management. In SOU 16, three plant species were employed for IPM, including Tunera subulata, Cassia cobanensis, and Antigonalan leptopus.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There is no evidence or records indicating the use of fire for pest control at any of the estates visited. This practice is explicitly addressed in the Sime Darby Plantation Group Sustainability and Quality Policy Statement, signed by the Group Managing Director on 02/12/2019, supported by SDP Responsible Agriculture Charter under section 3.2: Protect and enhance forest. The policy states:</p> <p>"We will seek to protect and enhance forest and wildlife, and minimise carbon emissions from land use change through:</p> <p>Zero tolerance of the use of fire within our land boundaries and conservation areas, and the establishment of effective monitoring and prevention systems, as well as protective firefighting measures in and around our operation."</p>	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The written justification in Standard Operating Procedure (SOP) of all agrochemicals are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Berhad. Refer to Sime Darby Plantation Agricultural</p>	Complied

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		Reference Manual, Issue No:2 dated June 2021. The manual already classified the type of weed, herbicide to used, rate/dosage and dilution rate as a guidance based on the field conditions. Addition or reduction of rounds and dosage will be considered in consultation with the respective head of units or agronomist.																												
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 2024 (to date) as follows:</p> <p><u>Kok Foh Estate</u></p> <table><tr><th>Month</th><th>Quantity (a.i/Ha)</th><th>Quantity (a.i/FFB)</th></tr><tr><td>Jan 2024</td><td>0.111</td><td>0.105</td></tr><tr><td>Feb 2024</td><td>0.041</td><td>0.042</td></tr><tr><td>Mar 2024</td><td>0.235</td><td>0.210</td></tr><tr><td>Apr 2024</td><td>0.200</td><td>0.144</td></tr></table> <p><u>Pertang Estate</u></p> <table><tr><th>Month</th><th>Quantity (a.i/Ha)</th><th>Quantity (a.i/FFB)</th></tr><tr><td>Jan 2024</td><td>0.021</td><td>0.011</td></tr><tr><td>Feb 2024</td><td>0.140</td><td>0.070</td></tr><tr><td>Mar 2024</td><td>0.122</td><td>0.073</td></tr></table>	Month	Quantity (a.i/Ha)	Quantity (a.i/FFB)	Jan 2024	0.111	0.105	Feb 2024	0.041	0.042	Mar 2024	0.235	0.210	Apr 2024	0.200	0.144	Month	Quantity (a.i/Ha)	Quantity (a.i/FFB)	Jan 2024	0.021	0.011	Feb 2024	0.140	0.070	Mar 2024	0.122	0.073	Complied
Month	Quantity (a.i/Ha)	Quantity (a.i/FFB)																												
Jan 2024	0.111	0.105																												
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Mar 2024	0.235	0.210																												
Apr 2024	0.200	0.144																												
Month	Quantity (a.i/Ha)	Quantity (a.i/FFB)																												
Jan 2024	0.021	0.011																												
Feb 2024	0.140	0.070																												
Mar 2024	0.122	0.073																												

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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</p>	Complied																																	

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		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.	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	There is no prophylactic use of pesticides in all estates visited.	Complied
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. - Minor compliance -	The Chemical Registers for the mill and sampled estates were available for verification and reviewed yearly and as and when there are introductions of new chemicals in the operations. The register showed that only class III & IV pesticides were used at the mill and estates. Paraquat and Monocrotophos was eliminated. In its place, less hazardous alternatives such as Glyphosate and Acephate was used instead.	Complied
7.2.6	(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. - Critical (Major) compliance -	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	Complied

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		records as per criteria 3.7.2. Sampled the training conducted for pesticide handlers as below: <u>Kok Foh Estate</u> <table><tr><td>Chemical handling and triple rinsing</td><td>03/05/2023</td></tr><tr><td>Chemical labelling management</td><td>29/04/2024</td></tr></table> <u>Kok Foh POM</u> <table><tr><td>Training</td><td>Date</td></tr><tr><td>Chemical Handling & Spillage Training</td><td>16/05/2024</td></tr></table> <u>Pertang Estate</u> <table><tr><td>Training</td><td>Date</td></tr><tr><td>Chemical Mixing, Eyewash Briefing</td><td>07/05/2024</td></tr><tr><td>Chemical Handling Training</td><td>10/05/2024</td></tr></table> <u>Sg Senarut Estate</u> <table><tr><td>Training</td><td>Date</td></tr><tr><td>Chemical awareness + USECCH</td><td>16/05/2024</td></tr><tr><td>Inter pump Training</td><td>26/02/2024</td></tr></table> <u>Sg Sabaling Estate</u> <table><tr><td>Training</td><td>Date</td></tr></table>	Chemical handling and triple rinsing	03/05/2023	Chemical labelling management	29/04/2024	Training	Date	Chemical Handling & Spillage Training	16/05/2024	Training	Date	Chemical Mixing, Eyewash Briefing	07/05/2024	Chemical Handling Training	10/05/2024	Training	Date	Chemical awareness + USECCH	16/05/2024	Inter pump Training	26/02/2024	Training	Date	
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		Chemical Handling	2503/2024	
		Triple Rinse and Spraying Work Training	25/03/2024	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- 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> <p><u>Major NC</u></p> <p>Storage of Chemicals was not accordance with procedures.</p> <p><u>Sg Sabaling Estate</u></p> <ul style="list-style-type: none">• During inspection at Chemical Store, it was found that no SDS was available for Chemical Rainbow, Acosta and Antracol.• SDS for Chemical Rogor and Thiram only available at English Language.• There is 1 unit of 20 liter container and 1 unit 1 liter container contained with chemical without any label. <p>It was not line with Chemical Safety Management (UM/HSE/OCP/04) with Section 6.3.1 Chemicals supplied shall be classified, packed and labelled in accordance with national or international regulatory requirements such as classification,</p>		Non-compliance

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		labelling and safety data sheet of hazardous chemicals regulations 2013 and pesticide (Labelling) Regulations 1984 and Section 6.3 (a) Chemical supplied shall be furnished with a complete and updated SDS. SDS shall be in English and accepted national language.	
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	<p>The procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established. Empty containers disposed through licenced contractors as SW409. For Pesticide containers that were triple rinsed and punctured will refer SOP “Penyimpanan Dan Pelupusan Bekas Racun” with reference number KFE/SOP/059.</p> <p><u>Kok Foh Estate</u></p> <p>Pesticide containers were triple rinsed and disposed through responsibly contractors. Refer latest disposal record to SX SXXXXX TXXXXXXXXX EXXXXXXXXX dated 29/12/2023. Refer DOE approval dated 05/03/2013 with reference number AS91/110/619/161.</p> <p><u>Sg Senarut Estate</u></p> <p>Pesticide containers were triple rinsed and disposed through responsibly contractors. Refer latest disposal record to SX SXXXXX TXXXXXXXXX EXXXXXXXXX dated 30/10/2023. Refer DOE approval dated 05/03/2013 with reference number AS91/110/619/161.</p>	Complied
7.2.9	(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 -	Verification through interview with estate management and site visit confirmed that Aerial spraying of pesticide was not practiced in the SOU 16 Supply bases.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	The CHRA of each operating units have recommended the necessity of annual medical surveillance for pesticide applicators exposed to	Complied

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	<p>- Critical (Major) compliance -</p>	<p>pesticides that are classified as organophosphates. Medical Surveillance were conducted in the mill and estates 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> <p><u>Kok Foh POM</u></p> <p>Medical Surveillance Programme has been performed successfully for the year 2023 on 11-13/09/2023 & 29/09/2023 for 26 workers, found that all of them are fit.</p> <p><u>Kok Foh Estate</u></p> <p>The management has conducted the medical surveillance dated 22/09/2023 & 03/10/2023, for 23 workers. All workers are declared fit to work by OHD.</p> <p><u>Pertang Estate</u></p> <p>The management has conducted the medical surveillance dated 09-17/01/2024, for 22 workers. All workers are declared fit to work by OHD.</p> <p><u>Sg Senarut Estate</u></p> <p>The management has conducted the medical surveillance dated 27/10/2023, for 24 workers and 25/01/2024 for 1 worker. All workers are declared fit to work by OHD.</p> <p><u>Sg Sabaling Estate</u></p> <p>The management has conducted the medical surveillance dated 28/03/2024, for 9 workers. All workers are declared fit to work by OHD.</p>	
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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>All estates have prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Gender Policy and Occupational Safety and Health Policy signed by the Managing Director on 05/05/2022. It was sighted during the visit to the stores there were signage stating that pregnant and breast-feeding women are not allowed to enter the chemical stores.</p> <p>As per verification with master list of workers, medical surveillance report, interview with management and site visit, it was confirmed that there is no under age of 18, pregnant or breastfeeding women and other people that have medical restrictions was assigned for chemical related works in the two estates visited. If there is any workers having medical restrictions as per examination during medical surveillance, they will be offered alternative equivalent work in the estates.</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>SOU16 Kok Foh POM and Estates had identified all wastes and sources of pollution. The Waste Management Action Plan FY 2023/2024 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estate and mill operations were:</p> <table><tr><td></td><td>Receptor</td><td>Sources</td></tr><tr><td>1</td><td>Air</td><td>Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</td></tr><tr><td>2</td><td>Water</td><td>Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler</td></tr></table>		Receptor	Sources	1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG	2	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler	Complied
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7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	The SOP on Scheduled Waste disposal is established and implemented. a) Details as provided in Waste Management Procedure for Upstream Malaysia, SD/SDP/GSD/HSE/0522/01 version 1	Non-compliance																																	

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		<p>dated May 2022.</p> <p>b) The inventory of the waste generated is recorded using the "E-SWISS" inventory system. Methodology of SW disposal is also described in indicator 4.5.3.2 above.</p> <p>c) All SW were disposed to Kualiti Alam Sdn Bhd. Details as sampled as shown below;</p> <p>The inventory of the waste generated is recorded using the "E-SWISS" inventory system. All SW are disposed to Kualiti Alam Sdn Bhd and Kubota Malaysia Sdn Bhd for the workshop lubricant and others waste. The estates scheduled wastes are disposed to Kubota Malaysia collection upon completion of machine/vehicles servicing and maintenance. Letter form DOE Putrajaya dated 13/04/2022 on the approval for Kubota Malaysia Sdn Bhd for collection and disposal management of scheduled waste from machine/vehicle servicing and maintenance was sighted and verified.</p> <p>Records of domestic waste disposal to municipal council approved landfill were sighted and verified for all visited estates. Waste collection scheduled for 2x to 3x /week by either contractor or SWM (Southern Waste Management – for Johor).</p> <p>Disposal of waste material was not effectively demonstrated.</p> <p><u>Sq Sabaling Estate</u></p> <p>At new land preparation area (rubber OP conversion) near to field 04A, an illegal waste dumping containing household waste mixed with scheduled waste(empty hydraulic/chemical/agriculture inputs waste were evident. The estate currently has no landfill and all domestic/household waste disposed to approved government landfill site. Thus a minor NC was raised.</p>	
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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 land preparation in SOU 16 Kok Foh POM and estate by burning ever since SDB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> a) EQMS-SOP-Section B2 - Under felling/clearing & land preparation b) Group Sustainability and Quality Policy Statement dated Dec 2019, supported by SDP Responsible Agriculture Charter <p>SDP has a policy of no open burning. As advocated, the estate practiced zero burning. In the replants visited during the audit in the estate, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	<p>A Standard Operating Procedure (SOP) for managing soil fertility to optimize yield and minimize environmental impacts has been established. The preservation of soil fertility is guided by the organization's SOPs, which include the following sections from various 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 -	Foliar and soil sampling were conducted by the Research and Development Department prior to fertilizer recommendations for the upcoming financial year. Leaf and soil nutrient analyses are standard practices for diagnosing fertilizer requirements in oil	Complied

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		<p>palms. Leaf sampling is typically conducted annually, while soil sampling is done at five-year intervals.</p> <p>Sampling records were reviewed as follows:</p> <p><u>Kok Foh Estate:</u></p> <ul style="list-style-type: none"> • The latest soil sampling was conducted on 23/08/2022, as indicated in report no. S67/2022 dated 23/11/2022. • The latest leaf sampling was conducted on 10/08/2022, as indicated in report no. P358/2023 dated 14/09/2022. <p><u>Pertang Estate:</u></p> <ul style="list-style-type: none"> • The latest soil sampling was conducted on 07/04/2023, as indicated in report no. S72/2023 dated 08/12/2023. • The latest leaf sampling was conducted on 01/03/2024, as indicated in report no. P128/2024 dated 04/04/2024. <p><u>Sg Senarut Estate</u></p> <ul style="list-style-type: none"> • The latest soil sampling was conducted on 28/06/2022, as indicated in report no. S49/2022 dated 26/08/2023. • The latest leaf sampling was conducted on 01/08/2024, as indicated in report no. P337/2023 dated 05/09/2024. <p><u>Sg Sabaling Estate</u></p> <ul style="list-style-type: none"> • The latest soil sampling was conducted on 04/08/2022, as indicated in report no. S58/2022 dated 07/10/2023. • The latest leaf sampling was conducted on 01/08/2023, as indicated in report no. P338/2023 dated 05/09/2023. 	
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7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	Records of EFB application were maintained by the sampled estates and made available for verification. Among the information available in the records is field number, quantity of EFB being applied (mt) and date of application. Based on the records, it was noted that the application rate pe Ha was around 20-40 mt/ha. The application was clearly seen during the field visit especially in the immature area.	Complied
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Fertilizer application was carried out based on recommendations provided by agronomists, which were derived from foliar sampling conducted. Records of fertilizer application were accessible for review at the visited estate. The estate reported the fertilizer application to the Research and Development Carey Island. For details, refer to the 2023 and 2024 Manuring Progress Report.	Complied
Criterion 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	Soil maps were readily available at all estates, delineating the various soil series, their respective area percentages and steep terrain within the estate boundaries. Notably, there were no marginal or fragile soils identified across the assessed estates. During field visits to the estates, it was observed that there were no oil palm plantings on steep terrains. Verification was done through site visits, interviews, and document verification.	Complied
7.5.2	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. - Minor compliance -	The commitment to protect and conserve biodiversity and ecosystems is articulated in the Sime Darby Plantation Group Sustainability and Quality Policy Statement, signed by the Group Managing Director on 2/12/2019, as well as the Responsible Agriculture Charter. Under section 3.1 of the Responsible Agriculture Charter, specifically 3.1.2, it is stated: "Management of erosion by protection of steep slopes and river reserves within our operations and promote restoration programs."	Complied

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		This underscores the company's dedication to managing erosion risks by safeguarding steep slopes and river reserves within its operations, while also actively promoting restoration efforts in relevant areas.															
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	There were no new oil palm plantings were undertaken on steep terrain. This was verified through thorough site visits, interviews, and document verification processes.	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 -	<p>Soil series and topography maps were observed at the sampled estates, revealing no categorization of fragile soils within the sampled estates. During planning for replanting, the estate considered factors such as land terrain, drainage, and road systems. The table below illustrates the identified soil series for each estate:</p> <p><u>Kok Foh Estate</u></p> <table><tr><td>Soil Series</td><td>Percentage, %</td></tr><tr><td>C2, Marang</td><td>29.35</td></tr><tr><td>C3, Durian</td><td>20.57</td></tr><tr><td>C4, Batu Anam</td><td>25.38</td></tr><tr><td>C4, Colluvium</td><td>8.73</td></tr><tr><td>C4, Malacca</td><td>15.97</td></tr></table> <p><u>Pertang Estate</u></p> <table><tr><td>Soil Series</td><td>Percentage, %</td></tr></table>	Soil Series	Percentage, %	C2, Marang	29.35	C3, Durian	20.57	C4, Batu Anam	25.38	C4, Colluvium	8.73	C4, Malacca	15.97	Soil Series	Percentage, %	Complied
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		C1, Munchong	16.05		
		C2, Sitiawan	13.4		
		C2, Sogomana	42.14		
		C3, Seremban	11.02		
		C4, Gajah Mati	13.68		
		C4, Malacca	1.16		
		C4, Unclassified	2.54		
		<u>Sg Senarut Estate</u>			
		Soil Series	Percentage, %		
		Durian	70.63		
		Malacca	17.31		
		Unclassified	10.05		
		Batu Anam	1.99		
		<u>Sg Sabaling Estate</u>			
		Soil Series	Percentage, %		
		Sitiawan	5.87		
		Batu Anam	4.19		
		Durian	41.65		

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		<table><tr><td>Gajah Mati</td><td>23.24</td></tr><tr><td>Malacca</td><td>19.15</td></tr><tr><td>Unclassified</td><td>5.87</td></tr></table>	Gajah Mati	23.24	Malacca	19.15	Unclassified	5.87																					
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Malacca	19.15																												
Unclassified	5.87																												
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 maps were available for the sampled estates, and no fragile soil was categorized within these estates. In planning for replanting, the estate considered factors such as land terrain, drainage, and road systems.	Complied																										
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	<div>The Agronomy Advisory and Services Department carried out assessments and supplied the estates with topography maps. Below are the sampled topography details observed at the estates:</div> <table><tr><th rowspan="2">Degree</th><th colspan="2">Percentage, %</th></tr><tr><th>Kok Foh</th><th>Pertang</th></tr><tr><td>0°-2° Flat</td><td>37.94</td><td>53.39</td></tr><tr><td>2°-6° Undulating</td><td>54.87</td><td>29.66</td></tr><tr><td>6°-12° Rolling</td><td>6.71</td><td>12.77</td></tr><tr><td>12°-20° Gentle Slope</td><td>0.44</td><td>3.45</td></tr><tr><td>20°-25° Hilly</td><td>0.00</td><td>0.00</td></tr><tr><td>>25° Steep</td><td>0.00</td><td>0.00</td></tr></table> <div></div> <table><tr><th>Degree</th><th colspan="2">Percentage, %</th></tr></table>	Degree	Percentage, %		Kok Foh	Pertang	0°-2° Flat	37.94	53.39	2°-6° Undulating	54.87	29.66	6°-12° Rolling	6.71	12.77	12°-20° Gentle Slope	0.44	3.45	20°-25° Hilly	0.00	0.00	>25° Steep	0.00	0.00	Degree	Percentage, %		Complied
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Degree	Percentage, %																												

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			Sg Senarut	Sg Sabaling	
		0°-2° Flat	8.86	27.92	
		2°-6° Undulating	33.48	57.78	
		6°-12° Rolling	45.83	13.92	
		12°-20° Gentle Slope	11.44	0.39	
		20°-25° Hilly	0.29	0.00	
		>25° Steep	0.06	0.00	
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 -	Peat soil was not identified at any of the estates visited within SOU 16. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estate. Therefore, the criteria regarding peat soil was not applicable.			Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	Peat soil was not identified at any of the estates visited within SOU 16. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estate. Therefore, the criteria regarding peat soil was not applicable.			Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Peat soil was not identified at any of the estates visited within SOU 16. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in			Not Applicable

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		the visited estate. Therefore, the criteria regarding peat soil was not applicable.	
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	Peat soil was not identified at any of the estates visited within SOU 16. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estate. Therefore, the criteria regarding peat soil was not applicable.	Not Applicable
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>	Peat soil was not identified at any of the estates visited within SOU 16. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estate. Therefore, the criteria regarding peat soil was not applicable.	Not Applicable
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	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 16. Verification through site visit, document checking, and interview confirmed that there is no new planting activity in the estate visited. Hence, the criteria was not applicable.	Not Applicable

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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>	Peat soil was not identified at any of the estates visited within SOU 16. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estate. Therefore, the criteria regarding peat soil was not applicable.	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>SOU16 Kok Foh POM certification unit had established its Water Management Plan for year 2024 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <p>a) Implementation of rainwater harvest,</p> <p>b) Construction of water gate for effective management of field drains,</p> <p>c) Establishment of <i>Mucuna bracteata</i> to prevent erosion,</p> <p>d) Side drain at field road to control water, frond stacking,</p> <p>e) Enhancement of ground vegetation at bare ground area.</p> <p>The water sources are as shown below;</p> <table><tr><th></th><th>Water sources</th><th>Usage</th><th>Monitoring & measurement</th><th>Freq</th><th>PI C</th><th>Review status</th></tr><tr><td>1</td><td>SAINS/SAJ</td><td>Purchased for domestic consumption</td><td>Monitoring water supply</td><td>Mthly</td><td>AMM gr</td><td>Awaiting approval from authority</td></tr></table>		Water sources	Usage	Monitoring & measurement	Freq	PI C	Review status	1	SAINS/SAJ	Purchased for domestic consumption	Monitoring water supply	Mthly	AMM gr	Awaiting approval from authority	Complied
	Water sources	Usage	Monitoring & measurement	Freq	PI C	Review status											
1	SAINS/SAJ	Purchased for domestic consumption	Monitoring water supply	Mthly	AMM gr	Awaiting approval from authority											

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			Construction of screw gate to prevent entry into field drain Regular inspection during high tide to identify any tide gate and flap door.																							
		<p>The Estate had implemented water managements plans which covered:</p> <ul style="list-style-type: none">a) Water shortage contingenciesb) Water pollution preventionc) Reduce wastaged) Identification & management of waste waterse) Monitoring rainfallf) Regular water quality analysis. <p>The water reduction plan is shown below;</p> <table><tr><th></th><th>Issues/Areas</th><th>Action Steps</th><th>PIC</th><th>Status</th></tr><tr><td>1</td><td>Rainwater collection</td><td>Large containers are to be placed at strategic locations to collect rainwater The rainwater shall be recycled for washing heavy machinery</td><td>AM/Field staff</td><td>On-going</td></tr><tr><td>2</td><td>Leakage on plumbing system</td><td>Frequent inspection to detect leakage Fix any leakage</td><td>AM/Field staff</td><td>On-going</td></tr><tr><td>3</td><td>Water compartment alization</td><td>To conserve level of soil moisture To minimize water stress during dry season</td><td>AM/Field staff</td><td>On-going</td></tr></table>						Issues/Areas	Action Steps	PIC	Status	1	Rainwater collection	Large containers are to be placed at strategic locations to collect rainwater The rainwater shall be recycled for washing heavy machinery	AM/Field staff	On-going	2	Leakage on plumbing system	Frequent inspection to detect leakage Fix any leakage	AM/Field staff	On-going	3	Water compartment alization	To conserve level of soil moisture To minimize water stress during dry season	AM/Field staff	On-going
	Issues/Areas	Action Steps	PIC	Status																						
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		4	Handling of chemicals	To recycle water spillage while mixing of chemical at mixing area	AM/Field staff	On-going
		5	education	Avoid excessive usage during cleaning Close pipe to prevent water dripping	AM/Field staff	On-going
		5	Re-streaming	Re stream from sterilizer condensate pit for dilution	Mill engineer	On-going
		The Mill Identification & Management of Waste Water				
			location	Wastewater produced	Treatment/containment	Reuse/recycle/disposal method
		1	Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ETP	Recover into system
		2	Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain
			Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain
		3	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain
		4	Lab	Cleaning water	Process drain	Monsoon drain

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		5	Wash room	Toilet water, cleaning water	Septic tank	Collected by licensed contractor.																			
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>SOU16 estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014). The buffer zones established are as follows:</p> <table><tr><td></td><td><i>River width</i></td><td><i>Buffer zone</i></td></tr><tr><td>1</td><td>> 40 meters</td><td>50 meters</td></tr><tr><td>2</td><td>20 - 40 meters</td><td>40 meters</td></tr><tr><td>3</td><td>10 - 20 meters</td><td>20 meters</td></tr><tr><td>4</td><td>5 - 10 meters</td><td>10 meters</td></tr><tr><td>5</td><td>< 5 meters</td><td>5 meters</td></tr></table> <p>The signboards were displayed accordingly at the site where applicable. The guideline was issued by the GSD Unit with latest revision dated on 13/6/2011.</p> <p>Water analysis report for surface water/river carried out every quarter as per SOP, Water Quality Monitoring, issue:1 dated 1//6/2016. A few parameters recorded were not complied with class IIA/IIB of NWQS and also pesticides residue in water analysis. Internal CAR was issued, and proper investigation of root cause and corrective action have been implemented.</p> <p>Samples are taken by the mill management for detection of any pollution arising from the mill and estate activities. As required</p>						<i>River width</i>	<i>Buffer zone</i>	1	> 40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters	Complied
	<i>River width</i>	<i>Buffer zone</i>																							
1	> 40 meters	50 meters																							
2	20 - 40 meters	40 meters																							
3	10 - 20 meters	20 meters																							
4	5 - 10 meters	10 meters																							
5	< 5 meters	5 meters																							

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		<p>under compliance schedule, clause 23 water samples from the upstream and downstream nearby river are taken for analysis for detection of any contamination /quality effect to the water courses in 3 monthly basis. Latest analysis report for upstream and downstream of Sg Tebu as per the following:</p> <table><tr><th>Sampling point</th><th>Date of monitoring</th><th>Remarks</th></tr><tr><td>Sg Tebu (Upstream)</td><td rowspan="2">27/03/2024</td><td rowspan="2">Ref: IE/2024 date of report 07/05/2024.</td></tr><tr><td>Sg Tebu (downstream)</td></tr></table> <p>Water analysis report for surface water/river carried out every quarter as per SOP, Water Quality Monitoring, issue:1 dated 1//6/2016. A few parameters recorded were not complied with class IIA/IIB of NWQS and also pesticides residue in water analysis. Internal CAR was issued, and proper investigation of root cause and corrective action have been implemented.</p> <p>Among others management plan taken;</p> <ul style="list-style-type: none">a) Regular inspection at buffer/HCV areasb) Monitor water from surrounding areasc) Track, measure and report all activities around riverd) Train and educate workers.	Sampling point	Date of monitoring	Remarks	Sg Tebu (Upstream)	27/03/2024	Ref: IE/2024 date of report 07/05/2024.	Sg Tebu (downstream)	
Sampling point	Date of monitoring	Remarks								
Sg Tebu (Upstream)	27/03/2024	Ref: IE/2024 date of report 07/05/2024.								
Sg Tebu (downstream)										
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	Based on “ <i>Jadual Pematuhan</i> ” (license no 006013 valid until 30/06/2024), method of discharge for Kok Foh POM is land application with 5000 mg/l BOD ₃ . Sighted quarterly report has been	Complied							

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	- Minor compliance -	submitted to DOE by quarterly basis and continuously comply with the stipulated limit.									
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis with the latest recording detailed sampled (water usage m3/per mt of fresh fruit bunches (FFB). Usage of water to FFB ranging from 1.3 – 1.7 m3/tonne FFB and varies depending on volume FFB processed for the particular month.	Complied								
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised											
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	<p>The monitoring is recorded in environment performance indicator-electricity generated by steam turbine tabulated for 2023 and to date 2024. It is calculated as electricity generated from turbine that produces power for the mill entire complex operation unit in kwh/mt CPO. A monthly record on energy consumption for both renewable and non-renewable sources were also maintained and documented. It is monitored to optimize use of renewable energy. The electricity energy monitoring based on CPO produced tabulated as shown below;</p> <table border="1"> <thead> <tr> <th></th><th>Energy Monitoring</th><th>2023</th><th>2024 (to date)</th></tr> </thead> <tbody> <tr> <td>1</td><td>kWh / mt CPO</td><td>88.8</td><td>77.51</td></tr> </tbody> </table> <p>Variation of ratio in the analysis were explained and justified. Under the energy management plan 2024 the mill aimed for reduction plan for fossil fuel usage;</p> <ul style="list-style-type: none"> - Educate workers on fuel saving practices. - Preventive maintenance programme 		Energy Monitoring	2023	2024 (to date)	1	kWh / mt CPO	88.8	77.51	Complied
	Energy Monitoring	2023	2024 (to date)								
1	kWh / mt CPO	88.8	77.51								
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.											

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7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Main sources of GHG emission identified were methane (CH₄) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SO_x and NO_x from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>The emission value is recorded and calculated through the utilisation of RSPO's Palm GHG Calculator ver. 4. Detail of GHG calculation can be found under appendix B.</p>	Complied						
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new development by the certification unit.	Complied						
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. (SM/5.2/EAI) and (SM/5.2/EIE) which covers estate and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:</p> <table><tr><td></td><td>Environmental receptors</td><td>Source</td></tr><tr><td>1</td><td>Air</td><td>Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and</td></tr></table>		Environmental receptors	Source	1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and	Complied
	Environmental receptors	Source							
1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and							

					gases). GHG emission from anaerobic processes (ETP, EFB dumping).	
			2	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down	
			3	land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.	
			Summary of the latest stack sampling as per below:			
			Year	Stack sampling	Results vs limit	
	2023	Iso kinetic sampling by ETOSH Consult & Engineering Plt, ref: ETOSH/SDPSB-KFPOM/ISO/054/2023 Date of monitoring: 28/03/2023	Dust/particulate: 113 mg/m3 vs 150 mg/m3 NOx: 22 mg/m3 vs 500 mg/m3 SOx: 15 mg/m3 vs 500 mg/m3			
	2024	Iso kinetic sampling by ETOSH Consult & Engineering Plt, ref: ETOSH/SDPSB-KFPOM/ISO/053/2024 Date of monitoring: 26/02/2024	Dust/particulate: 110 mg/m3 vs 150 mg/m3 NOx: 16 mg/m3 vs 500 mg/m3 SOx: 12 mg/m3 vs 500 mg/m3 CO: 411.7 mg/m3 vs 1000 mg/m3			
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area						

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7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Guided by SDPB ARM, preparation of replanting using fire is not allowed. Based on site visit at replanting fields of the sampled estates, there was no trace of burning observed. Palm trunks were chipped and windrowed.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	<p>There was no land preparation by burning ever since SDPB practice zero burning as per the policy in:</p> <ul style="list-style-type: none"> a) EQMS-SOP-Section B2 - Under felling/clearing & land preparation b) Group Sustainability and Quality Policy Statement dated Dec 2019, supported by SDP Responsible Agriculture Charter <p>The use of fire for waste disposal and for preparing land for oil palm cultivation or replanting was not practiced in the estate. The Group policy of "Zero open burning" has been enforced since July 2008. The operating units adhered to the policy of "Zero open burning" for any replanting. Furthermore, Sime Darby Plantation assigned 1 person based in HQ being in charge to detect any open fire in the Company's' fields using the Global Spot Watch. This is the measures taken by the organization to pledge towards zero open burning.</p> <p>Process flow for fire incident reporting</p> <p>Incident occurrence > SDP hotspot alert team identification > to notify OU > incident details investigated by OU > immediate site verification by OU > OU to report verification status using Fire Hotspot Internal Report (FHIR) > information with geo-tagged photo > reply to hotspot alert team.</p>	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Estates and mill under SOU16 held engagement with the adjacent stakeholders via briefing sessions as stated in ERP procedure and Fire Prevention and Control Measure. Therein containing;	Complied

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		a) Objective b) Activity and prevention c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill All stakeholders being briefed in the respective stakeholders meetings in a brief agenda relating to fire prevention and issues relating to environmental	
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 -	Group Sustainability Department (previously known as PSQM) has conducted HCV reassessment for SOU 16 on May 2016. Specific HCV area for SOU16 estates have been identified and documented in the said report. There is no land primary forest or any area required to protect or enhance HCVs based on LUCA conducted prior to any new land clearing within SOU16 estates.	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.	For the existing certified plantation, the previous HCV assessment is accepted based on Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019) under 4.1: existing certified plantation. As for the areas planned for any land clearing, LU Risk identification carried and verified for 2 visited estates; i) <u>Sg Sabaling Estates</u> Total managed area: 449.03 ha LUCA carried out on February 2023	Complied

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	<p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance -</p>	<p>Rubber Plantation is categorized under Agriculture/ Monocrop tree plantations not abandoned > 3 years Geo-tagged location with photo: Latitude:2.544258, Longitude: 102.689722 Final LU Risk identification map concluded that the area planned for land clearing categorized as low risk.</p> <p>ii) Sg Senarut Estate Total managed area: 425.68 ha and 383.3 ha LUCA carried out on February and December 2023 Rubber Plantation is categorized under Agriculture/ Monocrop tree plantations not abandoned > 3 years Geo-tagged location with photo: Latitude:2.535301, Longitude: 102.700573, Latitude:2.544258, Longitude: 102.689722 Final LU Risk identification map concluded that the area planned for land clearing categorized as low risk.</p>	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>		Not Applicable
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified in SOU16 estates. Hence, the requirement under this indicator does not apply</p>	Not Applicable

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7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>The audit findings have confirmed that there is no HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified in SOU16 estates. Hence, the requirement under this indicator does not apply</p>	Complied					
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The HCV re-assessment was carried out GSD formerly known as PSQM Department on March 2016. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <ul style="list-style-type: none">a) Overview of HCV assessmentb) Description of assessment area<ul style="list-style-type: none">- Landscape context- biodiversity & conservation values- ecosystem service / social & cultural valuesc) HCV criteria & application to agriculture<ul style="list-style-type: none">- Visual observation & supporting information- Wildlife in plantation- decision on HCV statusd) HCV management / Monitoring. <p>The report is given in details to provide the existence of HCV, complete with photo and description The conservation and management of such identified areas are also detailed therein. The HCV areas presence as identified by the estates within SOU16 are as per below;</p> <table><tr><td>Estates</td><td>Assessed areas</td><td>Area (Ha)</td><td>HCV classification</td><td>Remarks</td></tr></table>	Estates	Assessed areas	Area (Ha)	HCV classification	Remarks	Complied
Estates	Assessed areas	Area (Ha)	HCV classification	Remarks				

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		Kok Foh Estate	Water Catchment Area	7.5	HCV 4	Provide basic service (water resources) for domestic use	
			River reserve (Sg Tebu)	0.448	HCV 4	Promote soil conservation and prevent erosion	
		Pertang Estate	Water Catchment	0.07	HCV 4	Provide basic service (water resources) for critical situations	
		Sg Senarut/ Gemas Estate	Water Catchment (Sg Senarut)	3.94	HCV 4	Provide basic service (water resources) for critical situations	
			Water Catchment (Sg Gemas)	1.28	HCV 4	Provide basic service (water resources) for domestic use	
		Sg Sabaling Estate	Water catchment	2.56	HCV 4	Promote soil conservation and prevent erosion	
		Total of HCV area for SOU16		25.598 ha (inclusion on 9.8 ha from other estates)			
		A programme to regularly educate the workforce about the status of RTE species is in place and carried out on annual basis. For example the latest training was carried out as per below:					
		Estate		Date of training		Remarks	
Kok Foh Estate		11/05/2024		HCV and RTE training			
Sg Sabaling		15/4/2024		HCV and RTE training			
Sg Senarut Estate		15/04.2024		HCV and biodiversity			

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		All areas were sighted and verified. HCV of all above are re-categorized areas from the normal buffer zone category. Hectare for the re-categorized areas has not affected the others category including the planted areas. All the HCVs were maintained by site specific operating units. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, catchment and were documented. Map verification and site visit confirmed that the estate are surrounded by river/straits and villages. The HCVs, conservation areas/environmentally sensitive areas e.g. bund along the stretches of river/straits which passes bordering through the estate had been identified and being monitored.											
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	<p>The CU management has established a standard monitoring document. Details provided include the following information:</p> <ul style="list-style-type: none">a) Areab) Field no and GPS coordinatec) Observation<ul style="list-style-type: none">- Encroachment /sign of trespassing- Wildlife issues/conflicts/sighting- Pollution /erosion issuesd) Maintenance of signage / fence <p>The monitoring being made by the AP during the security rounds in the estate complex. The field staff/Assistant also played a role in providing information during their daily rounds in the fields. Records furnished by the APs were sighted and verified.</p> <table><tr><td></td><td>Action steps</td><td>Action Plan</td><td>Date</td><td>PIC</td></tr><tr><td>1</td><td>Inspection of HCV</td><td>Continuous inspection and recommendation To liase with related agency</td><td>On-going</td><td>EM</td></tr></table>		Action steps	Action Plan	Date	PIC	1	Inspection of HCV	Continuous inspection and recommendation To liase with related agency	On-going	EM	Complied
	Action steps	Action Plan	Date	PIC									
1	Inspection of HCV	Continuous inspection and recommendation To liase with related agency	On-going	EM									

2	Protection or conservation & monitoring of biodiversity area.	To continuously collaborate with R& D to monitor the status & health of trees	On-going	EM
	3	Interface with animals Raise awareness of HCV/RTE to employees Employees are taught not to disturbed/hunt wildlife. Liaison with <i>Jabatan Perhilitan</i> on wildlife encounter/discovery	On-going	EM
	4	Education and awareness Educate employees on importance of biodiversity. Encourage research on specific biodiversity To erect signage No fishing/no hunting/no swimming	On-going	EM
	5	Water bodies Education and awareness for workers Monitoring of water sampling No agrochemical application Cover any bare soil with planting of vetivar grasses, groundcover to reduce soil erosion	On-going	EM
*EM – Estate management				
Estate		Monitoring records	Remarks	
Kok Foh Estate		14/05/2024, 10/04/2024, 14/03/2024, 19/02/2024	No encroachment/human and pollution recorded. Based on sighting record, a black	

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				cobra recorded. A request has been made to further upkeep the area for safety.	
		Sg Senarut Estate	18/05/2024, 25/04/2024, 22/03/2024, 23/02/2024	No encroachment/ human and wildlife conflict/erosion and pollution recorded	
		Sg Sabaling	7/5/202, 3/4/2024, 4/3/2024, 7/2/2024	No encroachment/ human and wildlife conflict/erosion and pollution recorded	
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 16 estates. Hence, the requirement under this indicator does not apply</p>			Complied

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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2023** for **Kok Foh POM** and supply base was calculated using the PalmGHG Calculator version 4.0.1. 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 **2023** for **Kok Foh POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct	Extraction	%
CPO	1.38	OER	20.5
PKO	0	KER	4.79

Production	t/yr	Land Use	Ha
FFB Process	195,818.93	OP Planted Area	7,596.66
CPO Produced	40,140.17	OP Planted on peat	0
PKO Produced	0	Conservation (forested)	0
		Conservation (non-forested)	25.60
		Total	7,622.26

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	74,859.70	0.73	0	0	0	0	74,859.70	0.73
CO ₂ Emission from fertilizer	7,819.32	0.08	0	0	0	0	7,819.32	0.08
NO ₂ Emission	3,704.55	0.04	0	0	0	0	3,704.55	0.04
Fuel Consumption	88.63	0	0	0	0	0	88.63	0
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-70,539.47	-0.69	0	0	0	0	-70,539.47	-0.69
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	15,932.73	0.15	0	0	13,945.45	0	29,878.18	0.15

**Note: Includes both estates and smallholders*

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	38,383.83	0.2
Fuel Consumption	8.94	0
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	38,392.76	0

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

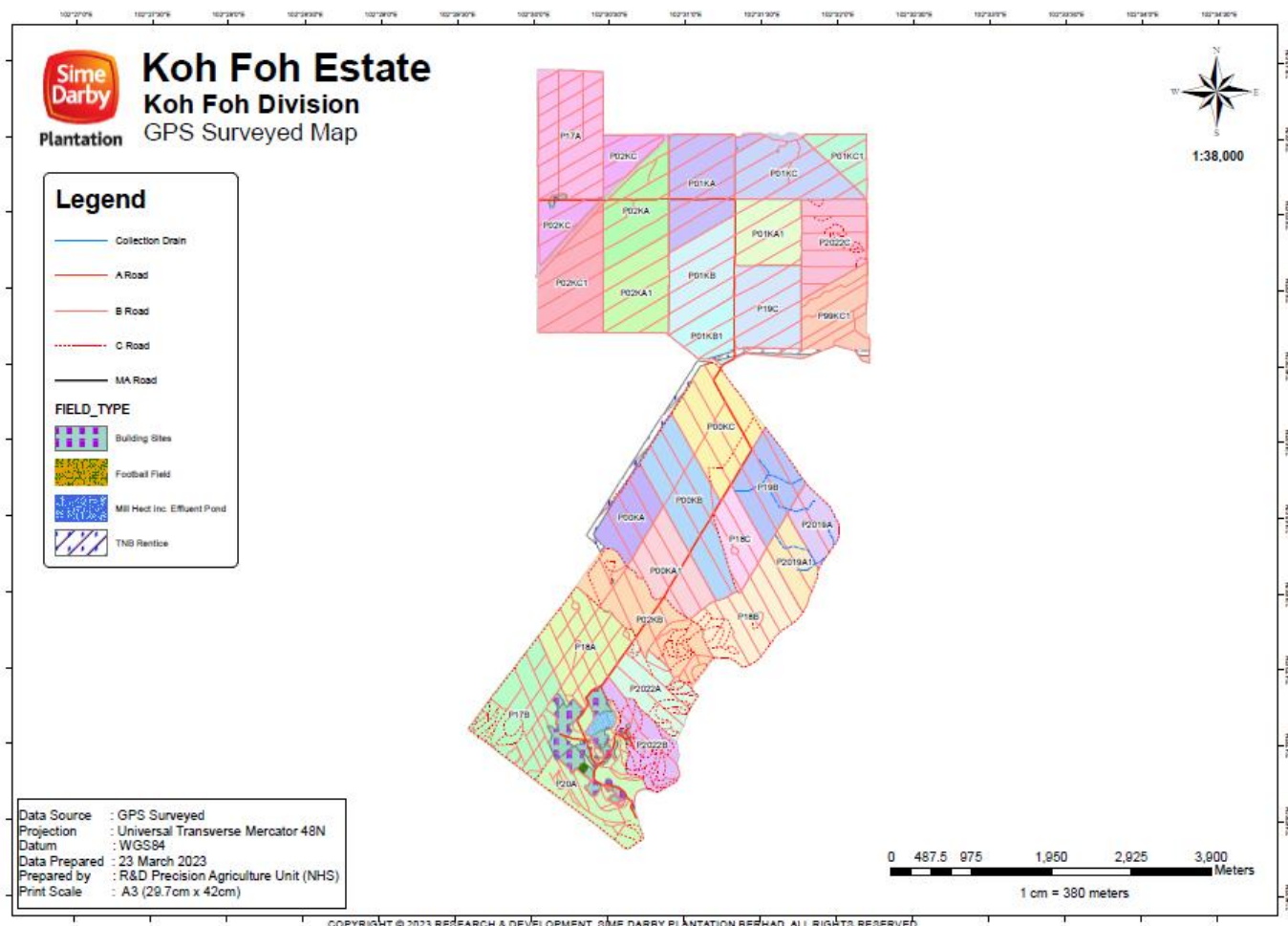
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

Appendix C: Location Map of Certification Unit and Supply bases

Appendix D: Estate Field Map

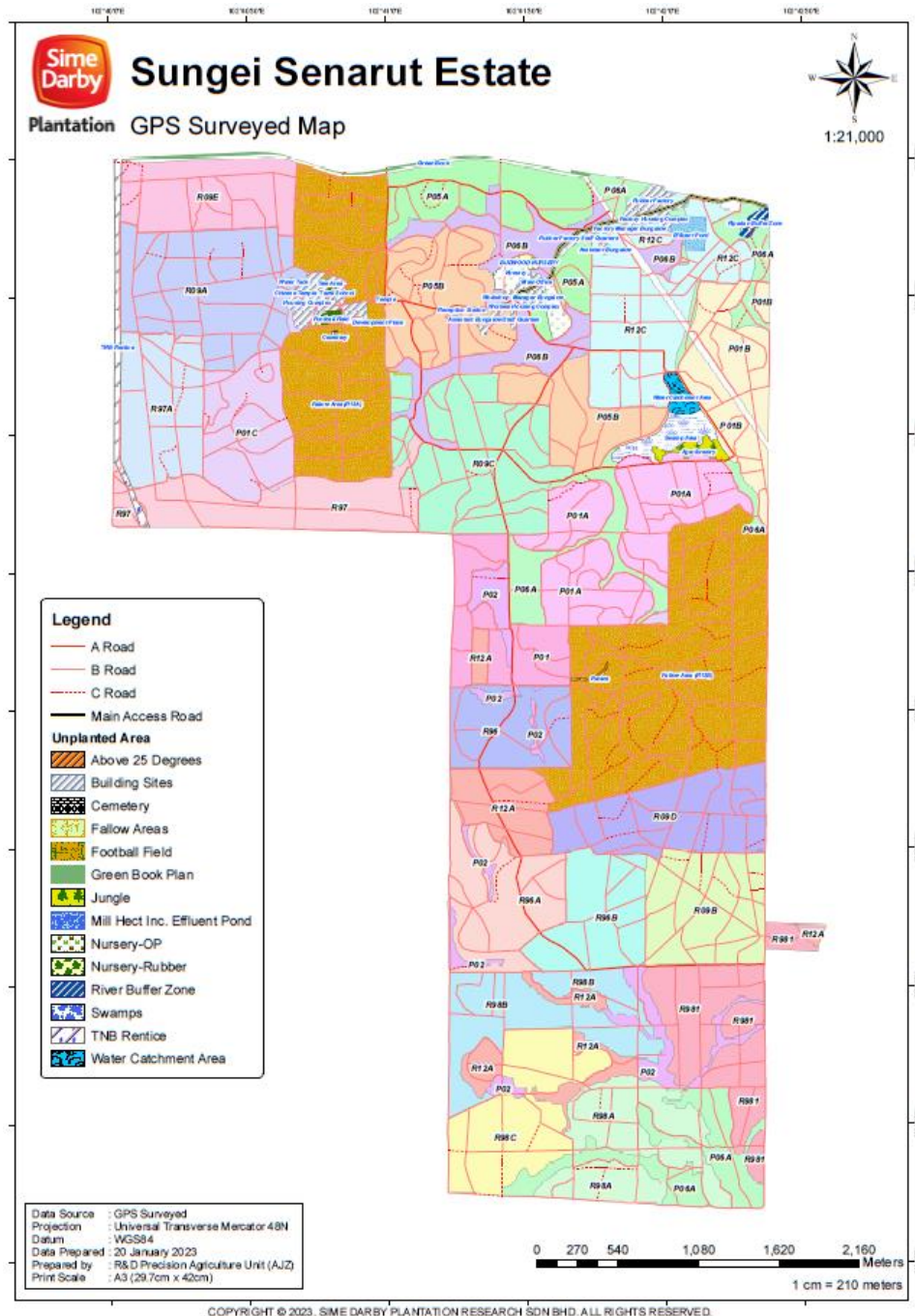
Koh Foh Estate



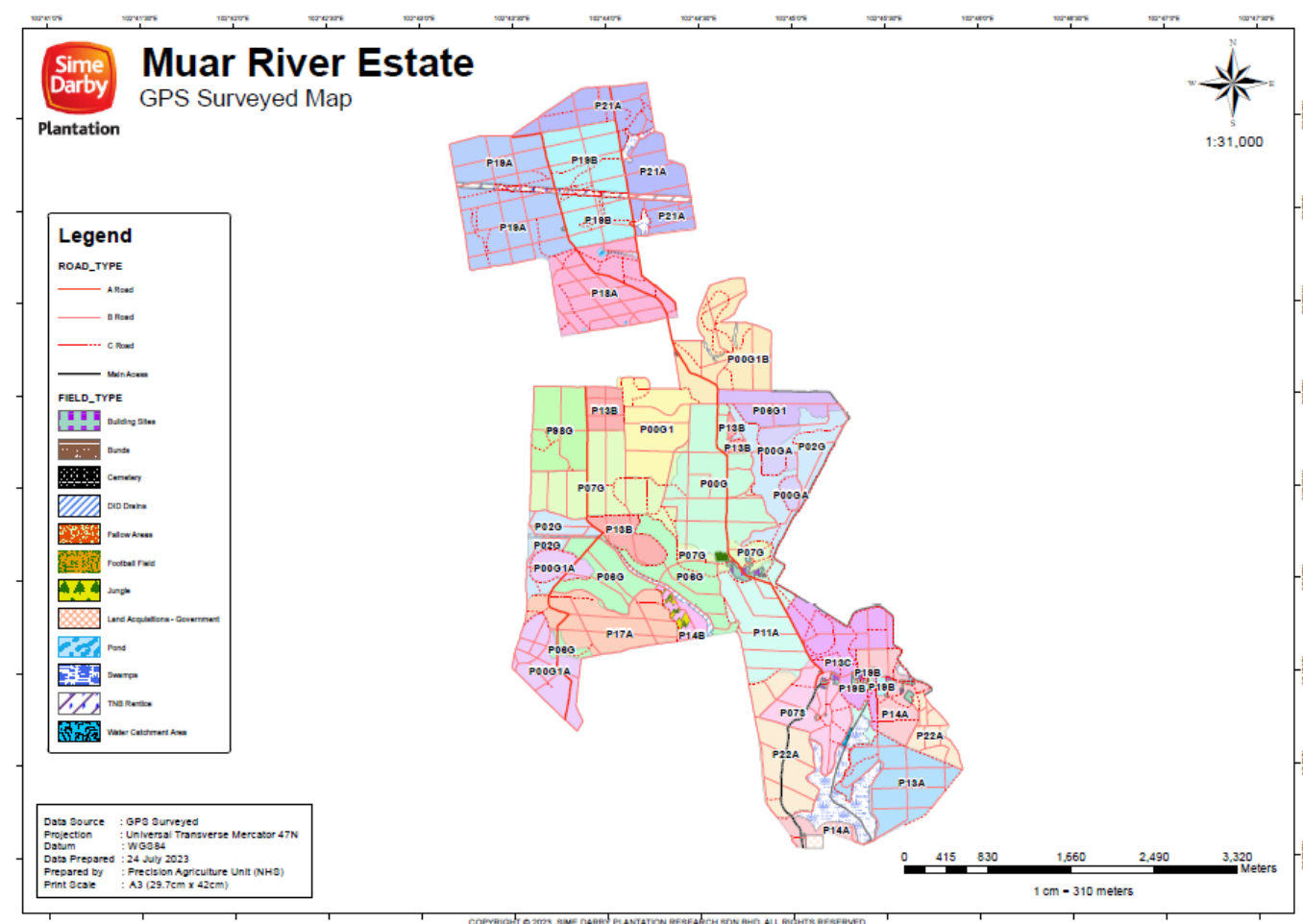
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Sungei Senarut Estate



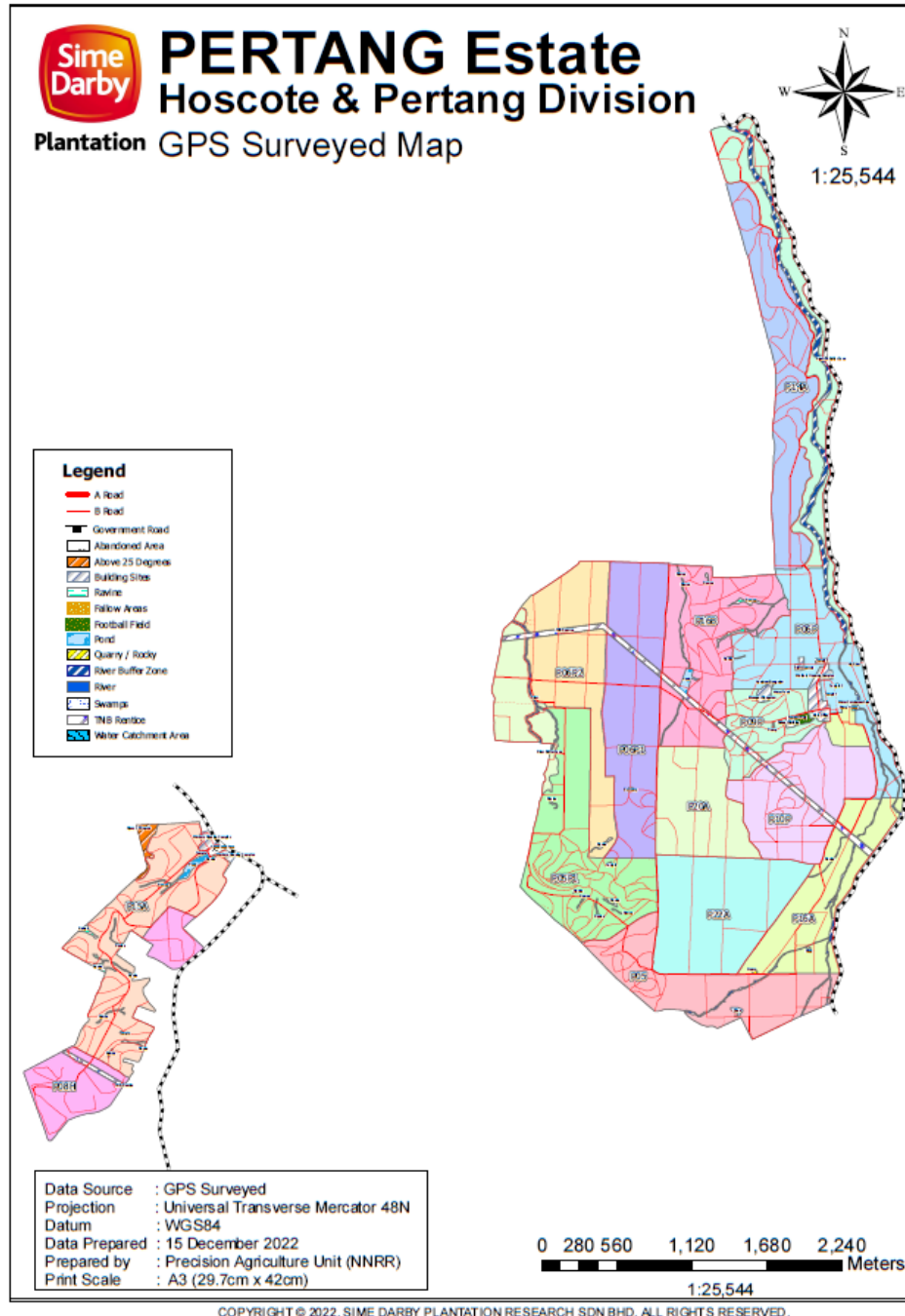
Muar River Estate



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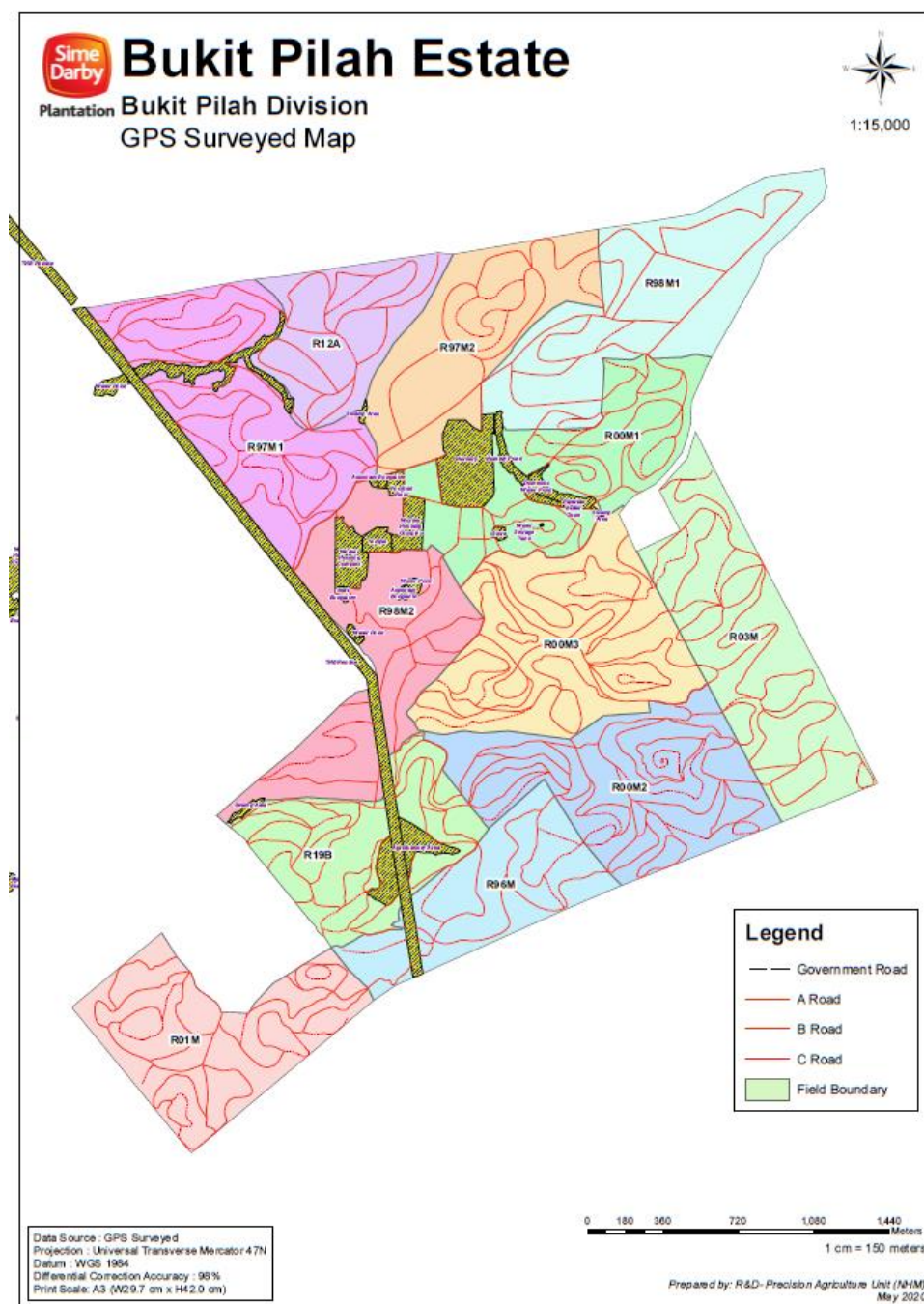
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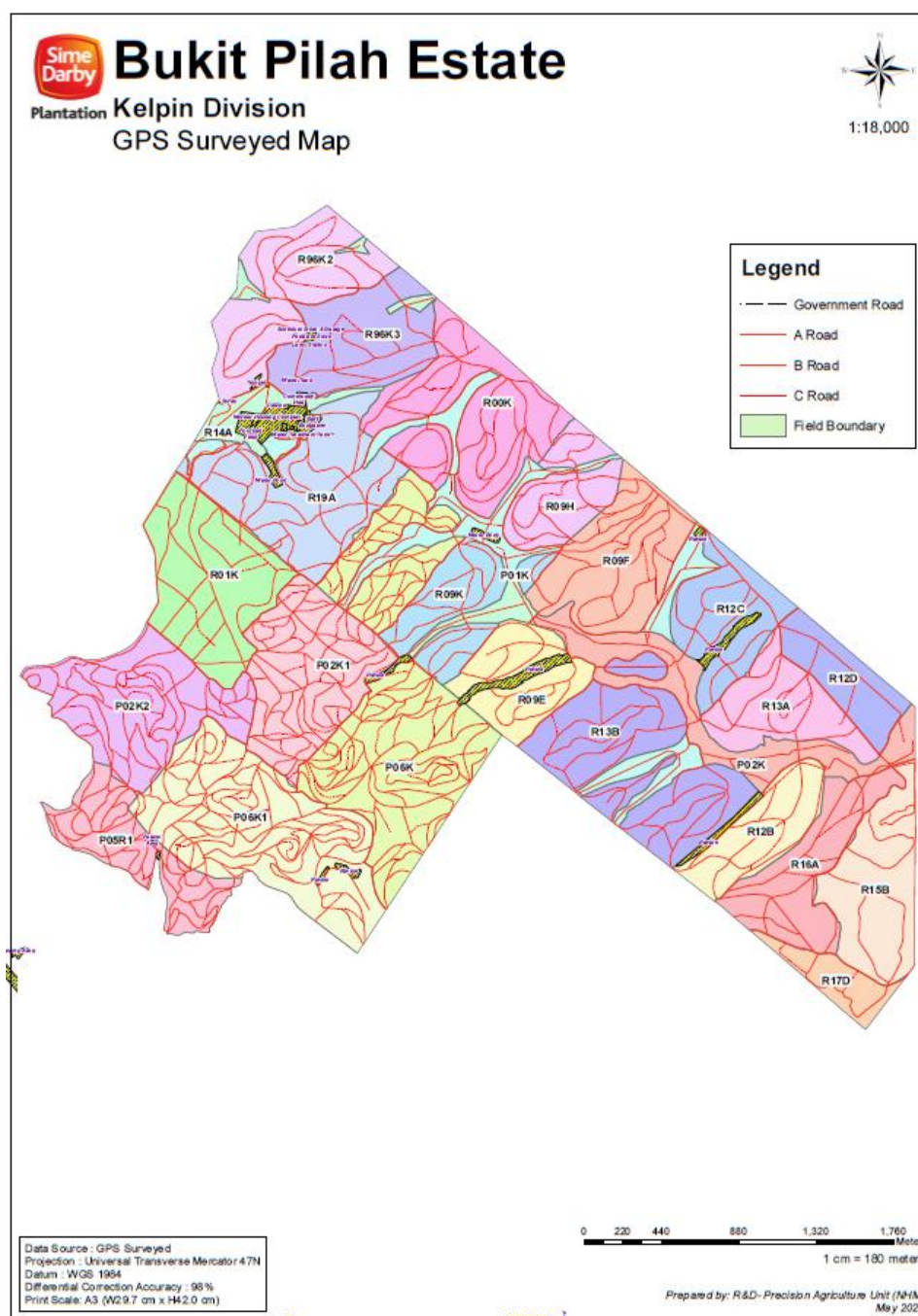
Pertang Estate

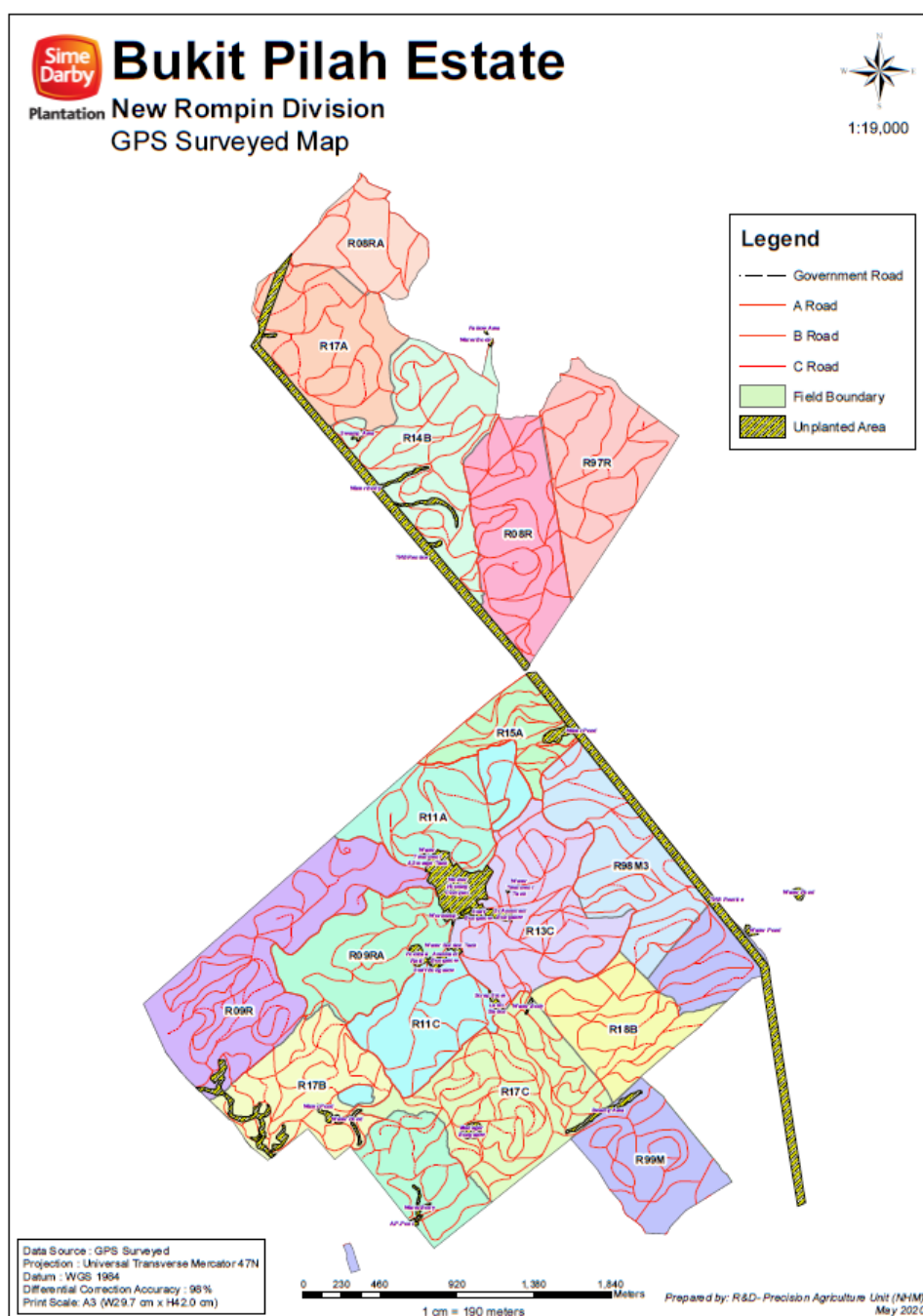


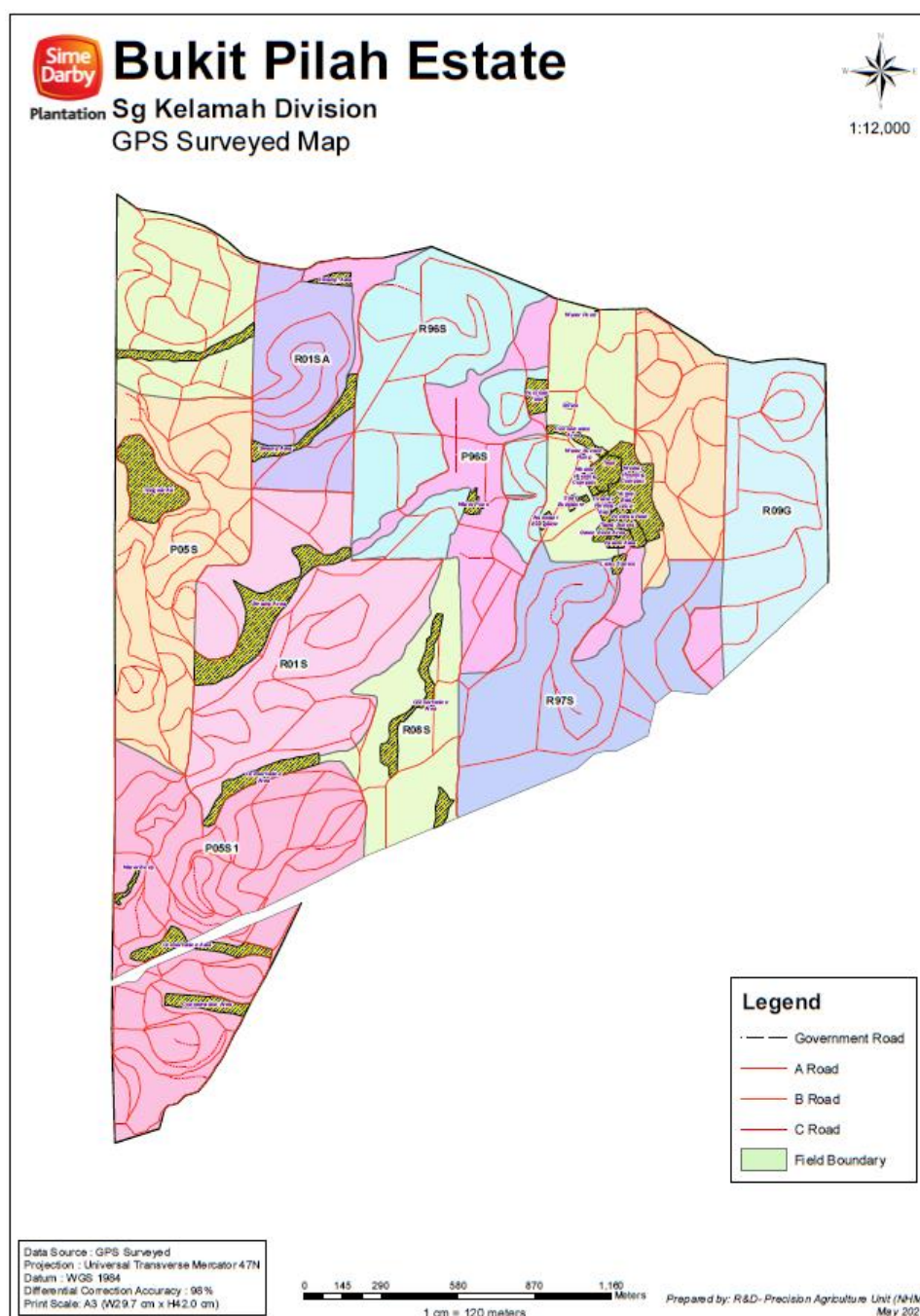
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Bukit Pilah Estate



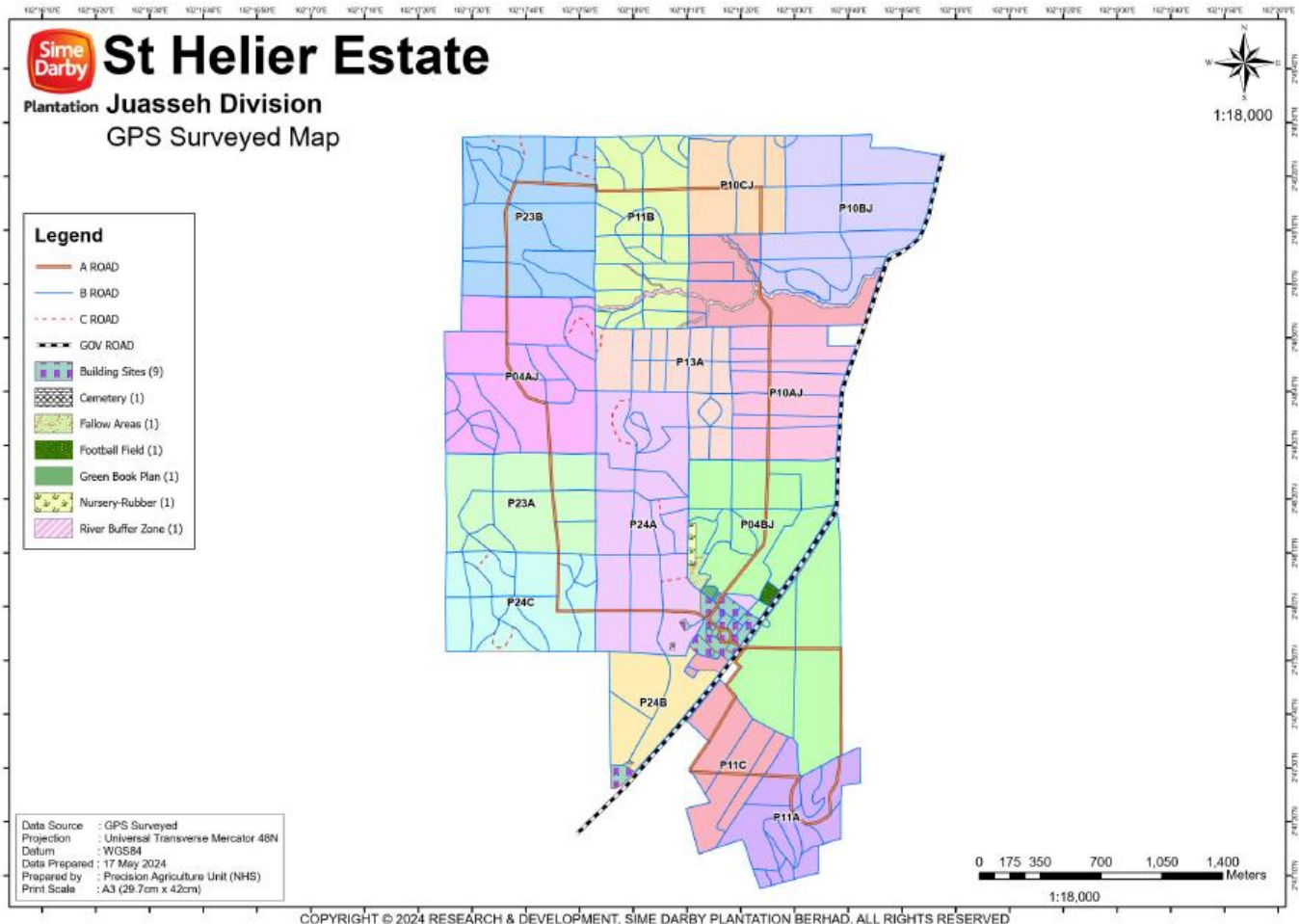


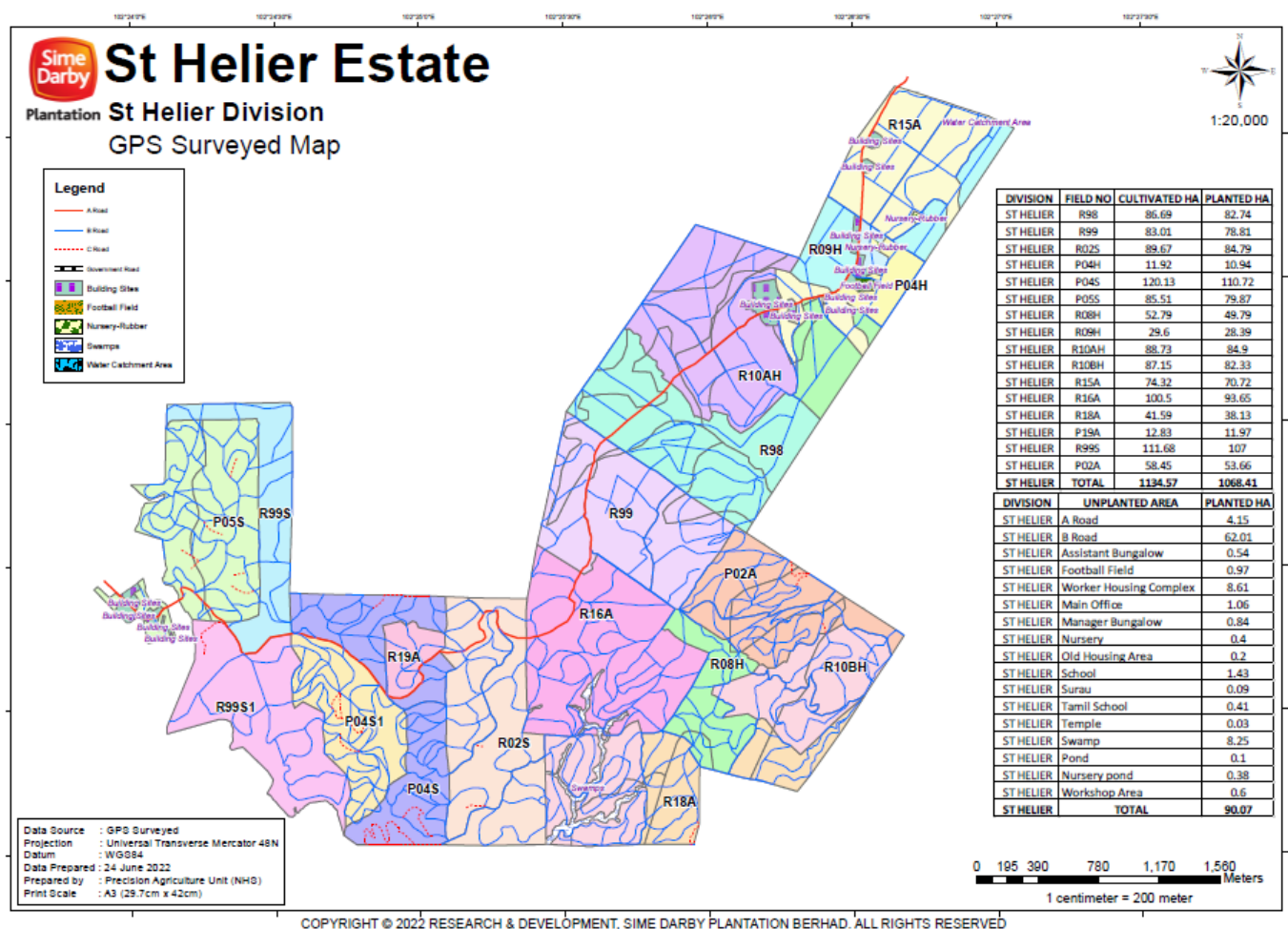




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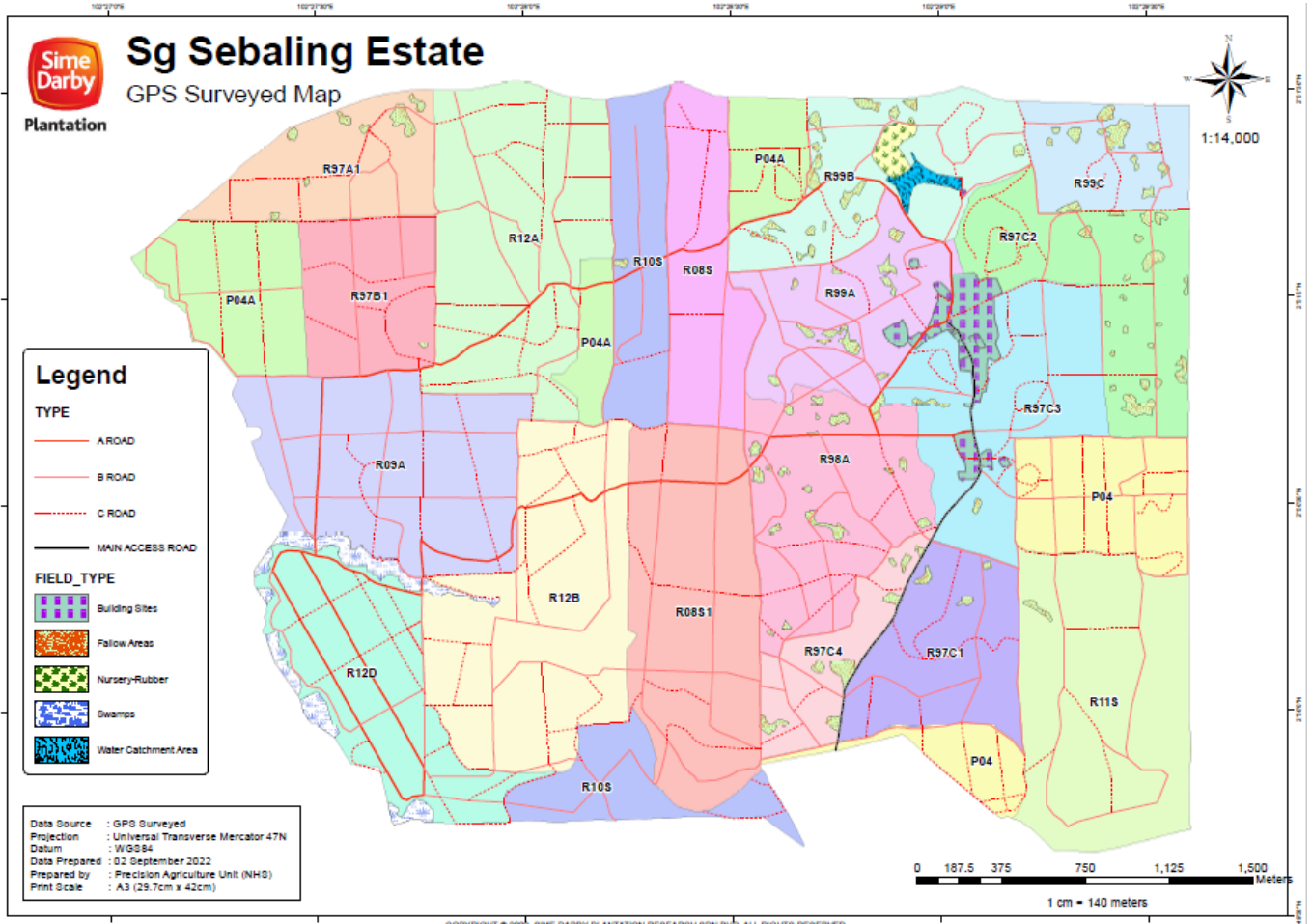
St Helier Estate





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Sg Sabaling Estate



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Appendix E: List of Smallholder Registered and/or sampled

Sampling Group	Current Certification	Scope Extension	Other:
Risk Factor Applied	N/A	N/A	N/A
Justification of Risk Factor Applied			
Number of samples			
Remarks			

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									
Note: * are smallholders sampled in this audit.									

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