

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

□ Initial Assessment						
☐ Annual Surveillance Assessment (Choose an item.)						
☑ Recertification Assessment (RA 2)						
□ Extension of Scope						

Client Company Name / Parent Company: TDM Plantation Sdn Bhd

Client Company / Parent Company Address: Level 1, Wisma TDM, 443 D Jalan Kamaruddin, 20400 Kuala Terengganu, Terengganu, Malaysia

Certification Unit:

Sungai Tong Palm Oil Mill

Location of Certification Unit: Lot 7663, Batu 23, Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu, Malaysia

Date of Final Report: 11/03/2024



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Section 1: Scope of the Assessment

1. Company Details	1. Company Details					
Parent Company	TDM Plantation Sdn Bhd					
RSPO Membership Number	1-0095-11-000-00	Membership A	pproval Date	28/02/2011		
Address	Level 1, Wisma TDM, 443 D Jalan Kamaruddin, 20400 Kuala Terengganu, Terengganu, Malaysia					
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Sungai Tong Palm Oil Mill					
Location / Address	Lot 7663, Batu 23, Jalan Kua Malaysia	la Terengganu-Ko	ota Bharu, 2150	0 Setiu Terengganu,		
Website	www.tdmberhad.com.my					
Management Representative	Mohd Izwan Haffez bin Che Azmi izwan.tdmp@tdmberhad.com.my					
Telephone	+609-620 4800	Facsimile	+609-620 480	3		

2. Certification Information					
Certificate Number	RSPO 595564	Certificat	e Start Date	27/12/2023	
Date of First Certification	27/12/2013	Certificat	e Expiry Date	26/12/2028	
Scope of Certification	Production of Sustainable Cru	ıde Palm Oil	(CPO) and Palm k	(ernel (PK)	
Visit Objectives	 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	 □ Pre Assessment (Choose an item.) □ Initial Assessment □ Annual Surveillance Assessment (ASA Choose an item.) ⋈ Recertification Assessment (RA 2) □ Scope Extension 				
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 ⊠ Malaysia National Interpretation 2019 of the RSPO P&C 2018				
Supply Chain Module	☐ Identity Preserved; ☒ Mas	ss Balance	Mill Capacity	60 MT/Hour	
ISH certification Phase	☐ Eligibility ☐ Milestone A ☐ Milestone B ☐ Not Applicable				
Is this a remote audit or on-site audit	⊠ On-site audit (Option AI)	□ On-site a	audit (Option AII)	☐ Remote audit (Option B)	



3. Other Certifications						
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date			
MSPO 678754	MSPO Part 4 (MS 2530-4:2013) General Principles for Palm Oil Mills	BSI Services Malaysia	26/12/2027			
MSPO 686825	MSPO Part 3 (MS 2530-3:2013) General Principles for Oil Palm Plantations and Organized Smallholders	Sdn. Bhd.	26/12/2027			

4. Location(s) of Mill & Supply Bases					
Name	Location	GPS Cod	ordinates		
(Mill / Supply Base / Group Manager / Smallholders)		Latitude	Longitude		
Sungai Tong Palm Oil Mill	Lot 7663, Batu 23, Jalan Kuala Terengganu Kota Bharu, 21500 Setiu, Terengganu, Malaysia	5° 18′ 29.88″ N	102° 54′ 37.80″ E		
Jaya Estate	Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu	5° 23′ 43.61″ N	102° 53′ 03.32″ E		
Fikri Estate	Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu	5° 19′ 21.50″ N	102° 53′ 46.00″ E		
Tayor Estate	Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu	5° 15′ 58.00″ N	102° 53′ 26.00″ E		
Pelung Estate	Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu	5° 16′ 55.56″ N	102° 49′ 59.52″ E		
Jerangau Estate	Jalan Jerangau, 21810 Ajil, Hulu Terengganu, Terengganu, Malaysia	4° 57′ 41.50″ N	103° 09′ 47.00″ E		
Pinang Emas Estate	Bukit Besi 23000 Dungun, Terengganu, Malaysia	4° 45′ 39.96″ N	103° 13′ 25.68″ E		

5. Description of Supply Base						
New Planting Development	⊠ No		□ Yes			
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted	
Jaya Estate	2,770.13	-	365.59	3,135.72	88.34	
Fikri Estate	2,632.62	21.26	957.14	3,611.02	72.91	
Tayor Estate	1,895.00	19.48	305.44	2,219.92	85.36	
Pelung Estate	1,121.51	19.54	1,871.30	3,012.35	37.23	



Jerangau Estate	1,330.74	-	150.18	1,480.92	89.86
Pinang Emas Estate	2,713.57	81.36	1,012.13	3,807.06	77.31
Total	12,463.57	141.64	4,661.78	17,266.99	72.18

Note:

- 1. HCV areas are updated as per the HCV reassessment report. Final report endorsed in February 2023.
- 2. Fikri Estate: River buffer zone Sungai Kulai (8.05ha) and water bodies (13.21ha).
- 3. Tayor Estate: River buffer zone Sungai Tayor (12.98ha), Sungai Balar (1.50ha) and HCV area (5.00 ha).
- 4. Pelong Estate: River buffer zone Sungai Pelong (8.77ha) and Sungai Kok (10.77ha).
- **5.** Pinang Emas Estate: River buffer zone Sungai Luit (52.25ha) and water bodies (29.11ha). The total hectare reduced after resurvey due to land acquisition by government and realignment of boundary with Gajah Mati Estate (South Zone). The total area is as per land area.

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Jaya Estate	-	-	2,446.11	324.02	2,770.13	-
Fikri Estate	559.01	273.52	1,544.20	255.89	2,073.61	559.01
Tayor Estate	335.36	228.26	897.46	433.92	1,559.64	335.36
Pelung Estate	256.88	620.10	244.53	-	864.63	256.88
Jerangau Estate	453.54	633.26	-	243.94	877.20	453.54
Pinang Emas Estate	367.23	730.95	851.95	763.44	2,346.34	367.23
Total (ha)	1,972.02	2,486.09	5,984.25	2,021.21	10,491.55	1,972.02

7. Summary of Certified Tonnage of FFB (Own Certified Scope)						
Estate /	Tonnage (MT) / year					
Smallholders	Estimated last year (Jan 23 – Dec 23)		Actual (Nov 22 - Oct 23)			
		Previous license period (Nov 22 - Dec 22)	Current license period (Jan 23 - Oct 23)			
Jaya Estate	54,000.00	10,224.05	35,912.50	52,500.00		
Fikri Estate	29,000.00	3,491.85	18,393.33	30,000.00		
Tayor Estate	20,000.00	3,175.39	13,856.80	24,000.00		
Pelung Estate	5,000.00	588.83	4,108.75	7,300.00		
Jerangau Estate	5,800.00	2,161.72	2,856.06	5,000.00		
Pinang Emas Estate	10,900.00	1,984.26	2,820.23	10,000.00		
Total	124,700.00	99,57	73.77	128,800.00		



Lower FFB Production compared to forecast is due to labor shortages in the estate, as experience workers went back, and replaced by the inexperience workers that required trainings. Other reasons is due to climate conditions where the estates were experiencing very high rainfall in during the monsoon season which affecting the productivity of the harvesters.

8. Summary of Certified Tonnage of FFB (from other certified unit(s))					
Estate /		Tonnage (MT) / year		
Smallholders	Estimated last year (Jan 23 – Dec 23)	Act (Oct 22 -	ual · Sep 23)	Forecast (Jan 24 - Dec 24)	
		Previous license period (Nov 22 - Dec 22)	Current license period (Jan 23 - Oct 23)		
Gajah Mati Estate		-	499.56		
Maidam Estate		-	- 46.82		
Pelantoh Estate		-	- 445.75		
Tebak Estate		- 587.43			
Jernih Estate		-	831.71		
Air Putih Estate		-			
Total		3,63	2.97		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)					
Out growers /	Tonnage (MT) / year				
smallholders	Estimated last year (Jan 23 – Dec 23)	Act (Oct 22	Forecast (Jan 24 - Dec 24)		
		Previous license period (Nov 22 - Dec 22)	Current license period (Jan 23 - Oct 23)		
3 rd Party FFB Supplier	N/A	1,770.87	31,125.39	N/A	
Total	N/A	32,89	96.26	N/A	

9A. I	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	November 2022	12,990.61	1,017.11	14,007.72	
2	December 2022	8,635.49	753.76	9,389.25	
3	January 2023	7,534.58	823.10	8,357.68	
4	February 2023	12,210.21	1,729.03	13,939.24	
5	March 2023	8,601.23	2,784.18	11,385.41	



	TOTAL	103,206.74	32,896.26	136,103.00
12	October 2023	8,477.68	2,973.24	11,450.92
11	September 2023	8,829.87	4,696.46	13,526.33
10	August 2023	8,104.86	1,974.32	10,079.18
9	July 2023	7,623.52	1,625.07	9,248.59
8	June 2023	6,113.65	4,207.56	10,321.21
7	May 2023	8,304.59	6,349.47	14,654.06
6	April 2023	5,780.45	3,962.96	9,743.41

10. Summary of Certifie	10. Summary of Certified Tonnage (MT) (not applicable for ISS)				
Estimated last year (Jan 23 – Dec 23)		Actual (Oct 22 - Sep 23)		Forecast (Jan 24 - Dec 24)	
	Previous license (Nov 22 - De	•	Current license period (Jan 23 - Oct 23)		
FFB		F	FB	FFB	
124,700.00 mt	21,626.10	21,626.10 mt 81,580.64 mt		128,800.00 mt	
	TOTAL		103,206.74 mt		
CPO (OER: 20.38%)		CPO (OEI	R: 19.24%)	CPO (OER: 19.51%)	
25,413.86 mt	4,025.43	mt	15,832.94 mt	25,128.88 mt	
	TOTAL	19,858.37 mt		_	
PK (KER: 5.03%)		PK (KER: 4.73%)		PK (KER: 5.00%)	
6,272.41 mt	1,022.33	1,022.33 mt 3,861.33 mt		6,440.00 mt	
	TOTAL		4,883.66 mt		

10A.	10A. Monthly Records of Certified CPO & PK since the last audit				
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)		
1	November 2022	2,509.26	646.09		
2	December 2022	1,516.17	376.24		
3	January 2023	1,381.54	363.47		
4	February 2023	2,330.70	567.27		
5	March 2023	1,685.21	416.79		
6	April 2023	1,160.94	289.94		
7	May 2023	1,675.95	395.75		
8	June 2023	1,141.25	267.64		
9	July 2023	1,517.24	345.86		

...making excellence a habit."



10	August 2023	1,534.03	351.79
11	September 2023	1,688.73	449.03
12	October 2023	1,717.35	413.79
TOTAL		19,858.37	4,883.66

11. Summ	11. Summary of Actual Volume sold					
Current Lice	ense period (Jan 23 - Oct	t 23)				
	RSPO Certified	Other Schen	nes Certified	Conventional	Total	
	KSPO Certified	ISCC	Others	Conventional	Total	
CPO (MT)	13,994.84	-	-	-	13,994.84	
PK (MT)	3,489.77	-	-	-	3,489.77	
Credits	-	-	-	-	-	
Previous Lic	ense period (Nov 22 - D	ec 22)				
CPO (MT)	3,236.64	-	-	-	3,236.64	
PK (MT)	630.15	-	-	-	630.15	
Credits	-	-	-	-	-	

11A. R	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 123ABC	TR-4b4072e5-1758	29.60	-	
2	Buyer 123ABC	TR-85694de4-386d	8.73	-	
3	Buyer 123ABC	TR-579ed106-70ac	12.09	-	
4	Buyer 123ABC	TR-6832947e-294f	170.53	-	
5	Buyer 123ABC	TR-504e67e7-8427	433.75	-	
6	Buyer 123ABC	TR-d8aae83f-15ae	499.74	-	
7	Buyer 123ABC	TR-1be193ea-8bab	819.88	-	
8	Buyer 123ABC	TR-21389dae-2a80	29.47	-	
9	Buyer 123ABC	TR-91517919-73ac	66.25	-	
10	Buyer 123ABC	TR-69e9caa3-082c	15.10	-	
11	Buyer 123ABC	TR-d1fdb636-9037	500.00	-	
12	Buyer 123ABC	TR-c899411a-cb97	16.40	-	
13	Buyer 123ABC	TR-85c28648-30a8	498.36	-	
14	Buyer 123ABC	TR-e4e3583c-48d0	136.74	-	



15	Buyer 123ABC	TR-f78494c3-8958	249.78	-
16	Buyer 123ABC	TR-d00b7db8-a3ee	497.87	-
17	Buyer 123ABC	TR-92ad8457-63a2	250.22	-
18	Buyer 123ABC	TR-8c00ac8a-40dd	84.83	-
19	Buyer 123ABC	TR-155de876-6637	200.00	-
20	Buyer 123ABC	TR-1c0332b7-c2a7	10.49	-
21	Buyer 123ABC	TR-f3c58552-61c7	539.22	-
22	Buyer 123ABC	TR-7ac6a902-8c5a	500.00	-
23	Buyer 123ABC	TR-ec3e6f56-35a9	460.78	-
24	Buyer 123ABC	TR-a6019700-2e67	500.28	-
25	Buyer 123ABC	TR-c5d9b7dc-3674	717.18	-
26	Buyer 123ABC	TR-ad0017b8-687f	499.31	-
27	Buyer 123ABC	TR-6de307db-3c15	514.06	-
28	Buyer 123ABC	TR-4986f577-5b2e	285.94	-
29	Buyer 123ABC	TR-df5d5e75-92b8	200.00	-
30	Buyer 123ABC	TR-20db6933-7144	9.58	-
31	Buyer 123ABC	TR-4fc32f86-ebca	200.00	-
32	Buyer 123ABC	TR-b0291f95-29bf	200.00	-
33	Buyer 123ABC	TR-d7458831-2a14	501.08	-
34	Buyer 123ABC	TR-634607c0-297a	798.86	-
35	Buyer 123ABC	TR-cdeffa01-a562	200.00	-
36	Buyer 123ABC	TR-762bb112-0afb	107.15	-
37	Buyer 123ABC	TR-cda35b0d-6bac	92.85	-
38	Buyer 123ABC	TR-a98638f1-30d0	28.67	-
39	Buyer 123ABC	TR-0424f966-0c38	251.18	-
40	Buyer 123ABC	TR-2e11f372-a86f	291.00	-
41	Buyer 123ABC	TR-a3fc4642-e68d	500.00	-
42	Buyer 123ABC	TR-f25928af-ef54	501.64	-
43	Buyer 123ABC	TR-453953f3-daaf	204.50	-
44	Buyer 123ABC	TR-5c906f6d-6749	204.28	-
45	Buyer 123ABC	TR-b0c1837f-77ed	9.00	-
46	Buyer 123ABC	TR-935d0184-9c81	80.15	-
47	Buyer 123ABC	TR-d6f10c81-1e6e	208.22	-
48	Buyer 123ABC	TR-dbc01f38-27fb	501.38	-



50 Buyer 123ABC TR-4a7147e7-e4e8 49.44 - 51 Buyer 123ABC TR-38d3bc8b-1155 467.64 - 52 Buyer 123ABC TR-5c26bec5-b701 500.51 - 53 Buyer 123ABC TR-5c6dbec5-b701 500.51 - 54 Buyer 123ABC TR-6dc8ba0-5b5f 42.93 - 55 Buyer 123ABC TR-76313b70-d256 32.36 - 56 Buyer 123ABC TR-7647c2b-5f94 32.36 - 57 Buyer 123ABC TR-764f2c2b-5f94 800.00 - 58 Buyer 123ABC TR-764f2c2b-5f94 - 83.01 59 Buyer 123ABC TR-7643a66c-8034 - 265.89 60 Buyer 123ABC TR-943d85c-663b - 162.99 61 Buyer 123ABC TR-76473f64-0fe2 - 93.76 63 Buyer 123ABC TR-349939f3-3lae - 81.09 64 Buyer 123ABC TR-366946b-6dd - 196.46	49	Buyer 123ABC	TR-8c952100-f23d	900.00	-
52 Buyer 123ABC TR-5c26bec5-b701 500.51 - 53 Buyer 123ABC TR-5861a399-1f8c 300.00 - 54 Buyer 123ABC TR-c6dc8ba0-5b5f 42.93 - 55 Buyer 123ABC TR-79313b70-d256 32.36 - 56 Buyer 123ABC TR-c562431a-bd70 502.46 - 57 Buyer 123ABC TR-d1c2f11-9e4e 800.00 - 58 Buyer 123ABC TR-fe4f2c2b-5f94 - 83.01 59 Buyer 123ABC TR-fe4f2c2b-5f94 - 83.01 59 Buyer 123ABC TR-fe3aa62c-8034 - 265.89 60 Buyer 123ABC TR-fe3da85c-b63b - 162.99 62 Buyer 123ABC TR-7c1d3fe4-0de2 - 93.76 63 Buyer 123ABC TR-d6b93d8-be6d - 196.46 64 Buyer 123ABC TR-d6b93d8-be6d - 196.46 65 Buyer 123ABC TR-3d659d8-be6d - 196.46	50	,	TR-4a7147e7-e4e8	49.44	-
53 Buyer 123ABC TR-5861a399-1f8c 300.00 - 54 Buyer 123ABC TR-c6dc8ba0-5b5f 42.93 - 55 Buyer 123ABC TR-79313b70-d256 32.36 - 56 Buyer 123ABC TR-c562431a-bd70 502.46 - 57 Buyer 123ABC TR-fe4f2c2b-5f94 - 83.01 58 Buyer 123ABC TR-5a08e986-1fc5 - 265.89 60 Buyer 123ABC TR-5a08e986-1fc5 - 265.89 60 Buyer 123ABC TR-4e3aa62c-8034 - 281.25 61 Buyer 123ABC TR-9e43d85c-b63b - 162.99 62 Buyer 123ABC TR-7c1d3fe4-0de2 - 93.76 63 Buyer 123ABC TR-4fb93947c-6364 - 348.91 65 Buyer 123ABC TR-4fb93947c-6364 - 348.91 65 Buyer 123ABC TR-508fef17-f8fc - 124.90 66 Buyer 123ABC TR-3de77422-a440 - 324.00	51	Buyer 123ABC	TR-38d3bc8b-1155	467.64	-
54 Buyer 123ABC TR-c6dc8ba0-5b5f 42.93 - 55 Buyer 123ABC TR-79313b70-d256 32.36 - 56 Buyer 123ABC TR-c562431a-bd70 502.46 - 57 Buyer 123ABC TR-cf1c2f11-9e4e 800.00 - 58 Buyer 123ABC TR-fe4f2c2b-5f94 - 83.01 59 Buyer 123ABC TR-5a08e986-1fc5 - 265.89 60 Buyer 123ABC TR-4e3aa62c-8034 - 281.25 61 Buyer 123ABC TR-9e43d85c-b63b - 162.99 62 Buyer 123ABC TR-7c1d3fe4-0de2 - 93.76 63 Buyer 123ABC TR-4d59947c-6364 - 81.09 64 Buyer 123ABC TR-4f6b9d8e-b6d - 194.66 65 Buyer 123ABC TR-3de77422-a440 - 324.00 66 Buyer 123ABC TR-3de77422-a440 - 324.00 68 Buyer 123ABC TR-6d6bad6-dcc - 118.16	52	Buyer 123ABC	TR-5c26bec5-b701	500.51	-
55 Buyer 123ABC TR-79313b70-d256 32.36 - 56 Buyer 123ABC TR-c562431a-bd70 502.46 - 57 Buyer 123ABC TR-fcf1c2f11-9e4e 800.00 - 58 Buyer 123ABC TR-fe4f2c2b-5f94 - 83.01 59 Buyer 123ABC TR-sa08e986-1fc5 - 265.89 60 Buyer 123ABC TR-4e3aa62c-8034 - 281.25 61 Buyer 123ABC TR-9e43d85c-b63b - 162.99 62 Buyer 123ABC TR-7c1d3fe4-0de2 - 93.76 63 Buyer 123ABC TR-4379c93f-31ae - 81.09 64 Buyer 123ABC TR-466b9dd8-be6d - 196.46 65 Buyer 123ABC TR-368fef17-f8fc - 124.90 67 Buyer 123ABC TR-3de77422-a440 - 324.00 68 Buyer 123ABC TR-74569051-3e1e - 84.74 70 Buyer 123ABC TR-604eap18-d6ec - 115.26	53	Buyer 123ABC	TR-5861a399-1f8c	300.00	-
56 Buyer 123ABC TR-c562431a-bd70 502.46 - 57 Buyer 123ABC TR-cftc2ft1-9e4e 800.00 - 58 Buyer 123ABC TR-fe4f2c2b-5f94 - 83.01 59 Buyer 123ABC TR-sa08e986-1fc5 - 265.89 60 Buyer 123ABC TR-4e3aa62c-8034 - 281.25 61 Buyer 123ABC TR-9e43d85c-b63b - 162.99 62 Buyer 123ABC TR-7cld3fe4-0de2 - 93.76 63 Buyer 123ABC TR-4379c93f-31ae - 81.09 64 Buyer 123ABC TR-466b9dd8-be6d - 196.46 65 Buyer 123ABC TR-3de77422-a440 - 324.00 66 Buyer 123ABC TR-7d8f5e43b-4542 - 118.16 69 Buyer 123ABC TR-7d8f9051-3e1e - 84.74 70 Buyer 123ABC TR-604ae7d-6dcc - 205.84 71 Buyer 123ABC TR-604e74c3eccob - 115.26	54	Buyer 123ABC	TR-c6dc8ba0-5b5f	42.93	-
57 Buyer 123ABC TR-cf1c2f11-9e4e 800.00 - 58 Buyer 123ABC TR-fe4f2c2b-5f94 - 83.01 59 Buyer 123ABC TR-5a08e986-1fc5 - 265.89 60 Buyer 123ABC TR-4e3aa62c-8034 - 281.25 61 Buyer 123ABC TR-9e43d85c-b63b - 162.99 62 Buyer 123ABC TR-7c1d3fe4-0de2 - 93.76 63 Buyer 123ABC TR-4379c93f-31ae - 81.09 64 Buyer 123ABC TR-d6b93d8-be6d - 196.46 65 Buyer 123ABC TR-508fef17-f8fc - 124.90 67 Buyer 123ABC TR-3de77422-a440 - 324.00 68 Buyer 123ABC TR-3de77422-a440 - 324.00 68 Buyer 123ABC TR-745d9051-3e1e - 84.74 70 Buyer 123ABC TR-604ae7d-6dcc - 205.84 71 Buyer 123ABC TR-e044e9a18-d46e - 115.26 <	55	Buyer 123ABC	TR-79313b70-d256	32.36	-
58 Buyer 123ABC TR-fe4f2c2b-5f94 - 83.01 59 Buyer 123ABC TR-5a08e986-1fc5 - 265.89 60 Buyer 123ABC TR-4e3aa62c-8034 - 281.25 61 Buyer 123ABC TR-9e43d85c-b63b - 162.99 62 Buyer 123ABC TR-7c1d3fe4-0de2 - 93.76 63 Buyer 123ABC TR-4379c93f-31ae - 81.09 64 Buyer 123ABC TR-d6b9d88-be6d - 196.46 65 Buyer 123ABC TR-508fef17-f8fc - 124.90 67 Buyer 123ABC TR-3de77422-a440 - 324.00 68 Buyer 123ABC TR-3de764542 - 118.16 69 Buyer 123ABC TR-745d9051-3e1e - 84.74 70 Buyer 123ABC TR-604ae7d-6dcc - 205.84 71 Buyer 123ABC TR-e04ae7d-6dcc - 205.84 71 Buyer 123ABC TR-23744c28-70b0 - 12.52	56	Buyer 123ABC	TR-c562431a-bd70	502.46	-
59 Buyer 123ABC TR-5a08e986-1fc5 - 265.89 60 Buyer 123ABC TR-4e3aa62c-8034 - 281.25 61 Buyer 123ABC TR-9e43d85c-b63b - 162.99 62 Buyer 123ABC TR-7c1d3fe4-0de2 - 93.76 63 Buyer 123ABC TR-4379c93f-31ae - 81.09 64 Buyer 123ABC TR-db93947c-6364 - 348.91 65 Buyer 123ABC TR-466b9dd8-be6d - 196.46 66 Buyer 123ABC TR-508fef17-f8fc - 124.90 67 Buyer 123ABC TR-3de77422-a440 - 324.00 68 Buyer 123ABC TR-745d9051-3e1e - 84.74 70 Buyer 123ABC TR-604ae7d-6dcc - 205.84 71 Buyer 123ABC TR-eb4e9a18-d46e - 115.26 72 Buyer 123ABC TR-23744c28-70b0 - 12.52 73 Buyer 123ABC TR-cfee21e8-29d2 - 256.21 <	57	Buyer 123ABC	TR-cf1c2f11-9e4e	800.00	-
60 Buyer 123ABC TR-4e3aa62c-8034 - 281.25 61 Buyer 123ABC TR-9e43d85c-b63b - 162.99 62 Buyer 123ABC TR-7c1d3fe4-0de2 - 93.76 63 Buyer 123ABC TR-4379c93f-31ae - 81.09 64 Buyer 123ABC TR-46b99347c-6364 - 348.91 65 Buyer 123ABC TR-466b9dd8-be6d - 196.46 66 Buyer 123ABC TR-508fef17-f8fc - 124.90 67 Buyer 123ABC TR-3de77422-a440 - 324.00 68 Buyer 123ABC TR-d8f5e43b-4542 - 118.16 69 Buyer 123ABC TR-745d9051-3e1e - 84.74 70 Buyer 123ABC TR-6c04ae7d-6dcc - 205.84 71 Buyer 123ABC TR-eb4e9a18-d4e - 115.26 72 Buyer 123ABC TR-23744c28-70b0 - 12.52 73 Buyer 123ABC TR-cfee2le8-29d2 - 256.21	58	Buyer 123ABC	TR-fe4f2c2b-5f94	-	83.01
61 Buyer 123ABC TR-9e43d85c-b63b - 162.99 62 Buyer 123ABC TR-7c1d3fe4-0de2 - 93.76 63 Buyer 123ABC TR-4379c93f-31ae - 81.09 64 Buyer 123ABC TR-db93947c-6364 - 348.91 65 Buyer 123ABC TR-466b9dd8-be6d - 196.46 66 Buyer 123ABC TR-508fef17-f8fc - 124.90 67 Buyer 123ABC TR-3de77422-a440 - 324.00 68 Buyer 123ABC TR-48f5e43b-4542 - 118.16 69 Buyer 123ABC TR-745d9051-3e1e - 84.74 70 Buyer 123ABC TR-604ae7d-6dcc - 205.84 71 Buyer 123ABC TR-eb4e9a18-d46e - 115.26 72 Buyer 123ABC TR-23744c28-70b0 - 12.52 73 Buyer 123ABC TR-cfee21e8-29d2 - 256.21 74 Buyer 123ABC TR-colod4f7a-61ba - 12.66 <	59	Buyer 123ABC	TR-5a08e986-1fc5	-	265.89
62 Buyer 123ABC TR-7c1d3fe4-0de2 - 93.76 63 Buyer 123ABC TR-4379c93f-31ae - 81.09 64 Buyer 123ABC TR-db93947c-6364 - 348.91 65 Buyer 123ABC TR-466b9dd8-be6d - 196.46 66 Buyer 123ABC TR-508fef17-f8fc - 124.90 67 Buyer 123ABC TR-3de77422-a440 - 324.00 68 Buyer 123ABC TR-3de77422-a440 - 324.00 68 Buyer 123ABC TR-745d9051-3e1e - 84.74 70 Buyer 123ABC TR-6c04ae7d-6dcc - 205.84 71 Buyer 123ABC TR-eb4e9a18-d46e - 115.26 72 Buyer 123ABC TR-23744c28-70b0 - 12.52 73 Buyer 123ABC TR-cfee21e8-29d2 - 256.21 74 Buyer 123ABC TR-e0bd4f7a-61ba - 67.79 75 Buyer 123ABC TR-777f5352-f609 - 417.34 <	60	Buyer 123ABC	TR-4e3aa62c-8034	-	281.25
63 Buyer 123ABC TR-4379c93f-31ae - 81.09 64 Buyer 123ABC TR-db93947c-6364 - 348.91 65 Buyer 123ABC TR-466b9dd8-be6d - 196.46 66 Buyer 123ABC TR-508fef17-f8fc - 124.90 67 Buyer 123ABC TR-3de77422-a440 - 324.00 68 Buyer 123ABC TR-d8f5e43b-4542 - 118.16 69 Buyer 123ABC TR-745d9051-3e1e - 84.74 70 Buyer 123ABC TR-604ae7d-6dcc - 205.84 71 Buyer 123ABC TR-eb4e9a18-d46e - 115.26 72 Buyer 123ABC TR-eb4e9a18-d46e - 115.26 72 Buyer 123ABC TR-cre21e8-29d2 - 256.21 74 Buyer 123ABC TR-cre21e8-29d2 - 256.21 74 Buyer 123ABC TR-e0bd4f7a-61ba - 12.66 76 Buyer 123ABC TR-777f5352-f609 - 417.34 <t< td=""><td>61</td><td>Buyer 123ABC</td><td>TR-9e43d85c-b63b</td><td>-</td><td>162.99</td></t<>	61	Buyer 123ABC	TR-9e43d85c-b63b	-	162.99
64 Buyer 123ABC TR-db93947c-6364 - 348.91 65 Buyer 123ABC TR-466b9dd8-be6d - 196.46 66 Buyer 123ABC TR-508fef17-f8fc - 124.90 67 Buyer 123ABC TR-3de77422-a440 - 324.00 68 Buyer 123ABC TR-d8f5e43b-4542 - 118.16 69 Buyer 123ABC TR-745d9051-3e1e - 84.74 70 Buyer 123ABC TR-6c04ae7d-6dcc - 205.84 71 Buyer 123ABC TR-eb4e9a18-d46e - 115.26 72 Buyer 123ABC TR-cfee21e8-29d2 - 256.21 73 Buyer 123ABC TR-cfee21e8-29d2 - 256.21 74 Buyer 123ABC TR-e0bd4f7a-61ba - 12.66 76 Buyer 123ABC TR-777f5352-f609 - 417.34 77 Buyer 123ABC TR-9be4e7f9-820d - 36.80 78 Buyer 123ABC TR-e1dbfe7b-9f34 - 291.60	62	Buyer 123ABC	TR-7c1d3fe4-0de2	-	93.76
65 Buyer 123ABC TR-466b9dd8-be6d - 196.46 66 Buyer 123ABC TR-508fef17-f8fc - 124.90 67 Buyer 123ABC TR-3de77422-a440 - 324.00 68 Buyer 123ABC TR-d8f5e43b-4542 - 118.16 69 Buyer 123ABC TR-745d9051-3e1e - 84.74 70 Buyer 123ABC TR-6c04ae7d-6dcc - 205.84 71 Buyer 123ABC TR-eb4e9a18-d46e - 115.26 72 Buyer 123ABC TR-23744c28-70b0 - 12.52 73 Buyer 123ABC TR-cfee21e8-29d2 - 256.21 74 Buyer 123ABC TR-cobd4f7a-61ba - 67.79 75 Buyer 123ABC TR-9be4e7f9-820d - 417.34 77 Buyer 123ABC TR-9be4e7f9-820d - 36.80 78 Buyer 123ABC TR-e1dbfe7b-9f34 - 291.60 79 Buyer 123ABC TR-0d969351-440c - 101.60	63	Buyer 123ABC	TR-4379c93f-31ae	-	81.09
66 Buyer 123ABC TR-508fef17-f8fc - 124.90 67 Buyer 123ABC TR-3de77422-a440 - 324.00 68 Buyer 123ABC TR-d8f5e43b-4542 - 118.16 69 Buyer 123ABC TR-745d9051-3e1e - 84.74 70 Buyer 123ABC TR-6c04ae7d-6dcc - 205.84 71 Buyer 123ABC TR-eb4e9a18-d46e - 115.26 72 Buyer 123ABC TR-23744c28-70b0 - 12.52 73 Buyer 123ABC TR-cfee21e8-29d2 - 256.21 74 Buyer 123ABC TR-cc1c0046-6bfd - 67.79 75 Buyer 123ABC TR-e0bd4f7a-61ba - 12.66 76 Buyer 123ABC TR-777f5352-f609 - 417.34 77 Buyer 123ABC TR-9be4e7f9-820d - 36.80 78 Buyer 123ABC TR-e1dbfe7b-9f34 - 291.60 79 Buyer 123ABC TR-0d969351-440c - 101.60 <	64	Buyer 123ABC	TR-db93947c-6364	-	348.91
67 Buyer 123ABC TR-3de77422-a440 - 324.00 68 Buyer 123ABC TR-d8f5e43b-4542 - 118.16 69 Buyer 123ABC TR-745d9051-3e1e - 84.74 70 Buyer 123ABC TR-6c04ae7d-6dcc - 205.84 71 Buyer 123ABC TR-eb4e9a18-d46e - 115.26 72 Buyer 123ABC TR-23744c28-70b0 - 12.52 73 Buyer 123ABC TR-cfee21e8-29d2 - 256.21 74 Buyer 123ABC TR-cc1c0046-6bfd - 67.79 75 Buyer 123ABC TR-e0bd4f7a-61ba - 12.66 76 Buyer 123ABC TR-777f5352-f609 - 417.34 77 Buyer 123ABC TR-9be4e7f9-820d - 36.80 78 Buyer 123ABC TR-e1dbfe7b-9f34 - 291.60 79 Buyer 123ABC TR-0d969351-440c - 101.60 80 Buyer 123ABC TR-0d326551-e717 - 125.05 <td>65</td> <td>Buyer 123ABC</td> <td>TR-466b9dd8-be6d</td> <td>-</td> <td>196.46</td>	65	Buyer 123ABC	TR-466b9dd8-be6d	-	196.46
68 Buyer 123ABC TR-d8f5e43b-4542 - 118.16 69 Buyer 123ABC TR-745d9051-3e1e - 84.74 70 Buyer 123ABC TR-6c04ae7d-6dcc - 205.84 71 Buyer 123ABC TR-eb4e9a18-d46e - 115.26 72 Buyer 123ABC TR-23744c28-70b0 - 12.52 73 Buyer 123ABC TR-cfee21e8-29d2 - 256.21 74 Buyer 123ABC TR-cc1c0046-6bfd - 67.79 75 Buyer 123ABC TR-e0bd4f7a-61ba - 12.66 76 Buyer 123ABC TR-777f5352-f609 - 417.34 77 Buyer 123ABC TR-9be4e7f9-820d - 36.80 78 Buyer 123ABC TR-e1dbfe7b-9f34 - 291.60 79 Buyer 123ABC TR-0d969351-440c - 101.60 80 Buyer 123ABC TR-0bd3d3bc-e464 - 312.09 81 Buyer 123ABC TR-32e6551-e717 - 125.05	66	Buyer 123ABC	TR-508fef17-f8fc	-	124.90
69 Buyer 123ABC TR-745d9051-3e1e - 84.74 70 Buyer 123ABC TR-6c04ae7d-6dcc - 205.84 71 Buyer 123ABC TR-eb4e9a18-d46e - 115.26 72 Buyer 123ABC TR-23744c28-70b0 - 12.52 73 Buyer 123ABC TR-cfee21e8-29d2 - 256.21 74 Buyer 123ABC TR-cc1c0046-6bfd - 67.79 75 Buyer 123ABC TR-e0bd4f7a-61ba - 12.66 76 Buyer 123ABC TR-777f5352-f609 - 417.34 77 Buyer 123ABC TR-9be4e7f9-820d - 36.80 78 Buyer 123ABC TR-e1dbfe7b-9f34 - 291.60 79 Buyer 123ABC TR-0d969351-440c - 101.60 80 Buyer 123ABC TR-0bd3d3bc-e464 - 312.09 81 Buyer 123ABC TR-32e6551-e717 - 125.05	67	Buyer 123ABC	TR-3de77422-a440	-	324.00
70 Buyer 123ABC TR-6c04ae7d-6dcc - 205.84 71 Buyer 123ABC TR-eb4e9a18-d46e - 115.26 72 Buyer 123ABC TR-23744c28-70b0 - 12.52 73 Buyer 123ABC TR-cfee21e8-29d2 - 256.21 74 Buyer 123ABC TR-cc1c0046-6bfd - 67.79 75 Buyer 123ABC TR-e0bd4f7a-61ba - 12.66 76 Buyer 123ABC TR-777f5352-f609 - 417.34 77 Buyer 123ABC TR-9be4e7f9-820d - 36.80 78 Buyer 123ABC TR-e1dbfe7b-9f34 - 291.60 79 Buyer 123ABC TR-0d969351-440c - 101.60 80 Buyer 123ABC TR-0bd3d3bc-e464 - 312.09 81 Buyer 123ABC TR-a32e6551-e717 - 125.05	68	Buyer 123ABC	TR-d8f5e43b-4542	-	118.16
71 Buyer 123ABC TR-eb4e9a18-d46e - 115.26 72 Buyer 123ABC TR-23744c28-70b0 - 12.52 73 Buyer 123ABC TR-cfee21e8-29d2 - 256.21 74 Buyer 123ABC TR-cc1c0046-6bfd - 67.79 75 Buyer 123ABC TR-e0bd4f7a-61ba - 12.66 76 Buyer 123ABC TR-777f5352-f609 - 417.34 77 Buyer 123ABC TR-9be4e7f9-820d - 36.80 78 Buyer 123ABC TR-e1dbfe7b-9f34 - 291.60 79 Buyer 123ABC TR-0d969351-440c - 101.60 80 Buyer 123ABC TR-0bd3d3bc-e464 - 312.09 81 Buyer 123ABC TR-a32e6551-e717 - 125.05	69	Buyer 123ABC	TR-745d9051-3e1e	-	84.74
72 Buyer 123ABC TR-23744c28-70b0 - 12.52 73 Buyer 123ABC TR-cfee21e8-29d2 - 256.21 74 Buyer 123ABC TR-cc1c0046-6bfd - 67.79 75 Buyer 123ABC TR-e0bd4f7a-61ba - 12.66 76 Buyer 123ABC TR-777f5352-f609 - 417.34 77 Buyer 123ABC TR-9be4e7f9-820d - 36.80 78 Buyer 123ABC TR-e1dbfe7b-9f34 - 291.60 79 Buyer 123ABC TR-0d969351-440c - 101.60 80 Buyer 123ABC TR-0bd3d3bc-e464 - 312.09 81 Buyer 123ABC TR-a32e6551-e717 - 125.05	70	Buyer 123ABC	TR-6c04ae7d-6dcc	-	205.84
73 Buyer 123ABC TR-cfee21e8-29d2 - 256.21 74 Buyer 123ABC TR-cc1c0046-6bfd - 67.79 75 Buyer 123ABC TR-e0bd4f7a-61ba - 12.66 76 Buyer 123ABC TR-777f5352-f609 - 417.34 77 Buyer 123ABC TR-9be4e7f9-820d - 36.80 78 Buyer 123ABC TR-e1dbfe7b-9f34 - 291.60 79 Buyer 123ABC TR-0d969351-440c - 101.60 80 Buyer 123ABC TR-0bd3d3bc-e464 - 312.09 81 Buyer 123ABC TR-a32e6551-e717 - 125.05	71	Buyer 123ABC	TR-eb4e9a18-d46e	-	115.26
74 Buyer 123ABC TR-cc1c0046-6bfd - 67.79 75 Buyer 123ABC TR-e0bd4f7a-61ba - 12.66 76 Buyer 123ABC TR-777f5352-f609 - 417.34 77 Buyer 123ABC TR-9be4e7f9-820d - 36.80 78 Buyer 123ABC TR-e1dbfe7b-9f34 - 291.60 79 Buyer 123ABC TR-0d969351-440c - 101.60 80 Buyer 123ABC TR-0bd3d3bc-e464 - 312.09 81 Buyer 123ABC TR-a32e6551-e717 - 125.05	72	Buyer 123ABC	TR-23744c28-70b0	-	12.52
75 Buyer 123ABC TR-e0bd4f7a-61ba - 12.66 76 Buyer 123ABC TR-777f5352-f609 - 417.34 77 Buyer 123ABC TR-9be4e7f9-820d - 36.80 78 Buyer 123ABC TR-e1dbfe7b-9f34 - 291.60 79 Buyer 123ABC TR-0d969351-440c - 101.60 80 Buyer 123ABC TR-0bd3d3bc-e464 - 312.09 81 Buyer 123ABC TR-a32e6551-e717 - 125.05	73	Buyer 123ABC	TR-cfee21e8-29d2	-	256.21
76 Buyer 123ABC TR-777f5352-f609 - 417.34 77 Buyer 123ABC TR-9be4e7f9-820d - 36.80 78 Buyer 123ABC TR-e1dbfe7b-9f34 - 291.60 79 Buyer 123ABC TR-0d969351-440c - 101.60 80 Buyer 123ABC TR-0bd3d3bc-e464 - 312.09 81 Buyer 123ABC TR-a32e6551-e717 - 125.05	74	Buyer 123ABC	TR-cc1c0046-6bfd	-	67.79
77 Buyer 123ABC TR-9be4e7f9-820d - 36.80 78 Buyer 123ABC TR-e1dbfe7b-9f34 - 291.60 79 Buyer 123ABC TR-0d969351-440c - 101.60 80 Buyer 123ABC TR-0bd3d3bc-e464 - 312.09 81 Buyer 123ABC TR-a32e6551-e717 - 125.05	75	Buyer 123ABC	TR-e0bd4f7a-61ba	-	12.66
78 Buyer 123ABC TR-e1dbfe7b-9f34 - 291.60 79 Buyer 123ABC TR-0d969351-440c - 101.60 80 Buyer 123ABC TR-0bd3d3bc-e464 - 312.09 81 Buyer 123ABC TR-a32e6551-e717 - 125.05	76	Buyer 123ABC	TR-777f5352-f609	-	417.34
79 Buyer 123ABC TR-0d969351-440c - 101.60 80 Buyer 123ABC TR-0bd3d3bc-e464 - 312.09 81 Buyer 123ABC TR-a32e6551-e717 - 125.05	77	Buyer 123ABC	TR-9be4e7f9-820d	-	36.80
80 Buyer 123ABC TR-0bd3d3bc-e464 - 312.09 81 Buyer 123ABC TR-a32e6551-e717 - 125.05	78	Buyer 123ABC	TR-e1dbfe7b-9f34	-	291.60
81 Buyer 123ABC TR-a32e6551-e717 - 125.05	79	Buyer 123ABC	TR-0d969351-440c	-	101.60
	80	Buyer 123ABC	TR-0bd3d3bc-e464	-	312.09
TOTAL 17,231.48 4,119.92	81	Buyer 123ABC	TR-a32e6551-e717	-	125.05
	TOTAL			17,231.48	4,119.92



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

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

11D. Re	11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No. Buyers Name PalmTrace Trading RSPO Credits of Certified License Number CPO Sold				
1	NA	NA	NA	
		NA		

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

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



13. Inde	13. Independent Smallholders Actual Sold Tonnage / Volume								
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE		
Current Li	cense period (J	an 23 - Oct 23)							
Credits				NA	NA	NA	NA		
Physical	NA	NA	NA						
Previous L	Previous License period (Nov 22 - Dec 22)								
Credits				NA	NA	NA	NA		
Physical	NA	NA	NA						

13A.	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)	CPO Sold	Certified PK Sold (MT/credit)	PKO Sold	Certified PKE Sold (MT/credit)		
1	NA	NA	NA	NA	NA	NA	NA		
TOTAL			NA	NA	NA	NA	NA		



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 **05/11/2023 – 09/11/2023.** The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on **29/09/2023 through** <u>11-16.-rspo-public-notification recertification sungai-tong-palm-oil-mill-supply-base english-1.pdf (bsigroup.com)</u>

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 **30/01/2024**. 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.

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

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

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

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

Assessment Program								
Name (Mill / Supply Base)	Year 1 (Re- Certification)	Year 2 (ASA2-1)	Year 3 (ASA2-2)	Year 4 (ASA2-3)	Year 5 (ASA2-4)			
Sungai Tong POM	✓	√	✓	√	✓			
Jaya Estate	✓		✓	√				
Fikri Estate	✓	✓		√	✓			
Tayor Estate		✓	✓		✓			
Pelung Estate	✓		✓	√				
Jerangau Estate		✓	✓		✓			
Pinang Emas Estate	✓	√		√	✓			

Tentative Date of Next Visit: November 3, 2024 - November 7, 2024

Total Number of Mandays: 15 Mandays



2.2 BSI Assessment Team

Name	Role	Competency
Ahmad Rufi Bin Abu Talib Khan (ARK)	Team Leader	Education: Bachelor Degree In Mechanical Engineering from Universiti Teknologi MARA Shah Alam, graduated in 2015 Work Experience: He started his career as Assistant Mill Manager, managing the day-to-day mill operations. In his five years' experience, he has experience handling the certification of ISO 9001, OHSAS 18001, ISO 14001 as well as Malaysia Sustainable Palm Oil (MSPO). He is a qualified Lead Auditor for MS 2530:2013 and has accumulated more than 300 audit days throughout his current career as the auditor for multiple disciplines covering all over Malaysia Training attended: He has completed CQI – IRCA approved ISO 9001, ISO 14001 and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course.
		Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English
		Aspect covered in this audit:
		oximes Good Agriculture Practice $oximes$ Health and Safety $oximes$ Supply chain requirements
		\square Social \square Environmental \boxtimes Market Communication and claim requirements
		$\hfill \square$ ISH context (ICS, internal audit, policy, business planning and trading system)
Mohamed Hidhir Zainal Abidin	Team Member	Education: Bachelor Degree in Chemical Engineering, National University of Malaysia, 2006
(MHZ)		Work Experience:
		 7 years working experience in palm oil industry specifically on palm oil milling for 5 years 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
		Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.
		Aspect covered in this audit:
		\square Good Agriculture Practice \square Health and Safety \square Supply chain requirements
		oximes Social $oximes$ Environmental $oximes$ Market Communication and claim requirements
		$\hfill \square$ ISH context (ICS, internal audit, policy, business planning and trading system)



Amir Bahari (AB)	Team Member	Education: Holds a Bachelor of Science (Hons) in Chemistry, University Science Malaysia & a Diploma in Palm Oil Milling Tech/Management, Malaysian Palm Oil Board.
		Work Experience: He has more than 30 years of plantation experience including managing rubber factories, palm oil mills and estates. Since 2014 he has started auditing professionally for varies scheme including RSPO and MSPO for varies accredited certification body.
		Training attended: He has completed ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course Endorsed RSPO P&C Refresher Training, HCV Awareness for RSPO/ MSPO auditors and RSPO HCV Audit Guidelines.
		Aspect covered in this audit:
		Language proficiency: He is fluent in both verbal/written in Bahasa Malaysia and English
		Aspect covered in this audit:
		☐ Good Agriculture Practice ☐ Health and Safety ☐ Supply chain requirements
		☐ Social ☑ Environmental ☐ Market Communication and claim requirements
		$\hfill \square$ ISH context (ICS, internal audit, policy, business planning and trading system)
Dr. Suhaili Sahari	Peer Reviewer	Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.
		Work Experience: Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.
		Training attended:
		1. ISO 9001:2015 Lead Auditor and Internal Auditor
		2. ASI reviewer training
		3. Safety and Health
		4. ISO 14001:2015 Standard
		5. RSPO Standards: RSPO P&C 2018 MY-NI 2019
		6. MSPO Standards: MS 2530: 2013 part 1, 2, 3 and 4



7. Problem Solving Technique: 8 D, ICC, QCC, Systematic PS
8. HACCP MS 1480:2019
9. GAP Standard: GLOBALGAP, Euro GAP
10. MSPO Peer Reviewer Training 2 - 2017 by MPOCC.
Expertise: General Management, Auditing, Environment and Plantation Management.

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	ARK	MHZA	ABB
Saturday, 04/11/2023		Travelling from Kuala Lumpur to Kuala Terangganu	√	~	√
Sunday, 05/11/2023	0900 - 0930	Opening Meeting: • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan	√	~	√
Jaya Estate	0930 - 1230	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, Scheduled waste management, worker housing, clinic, Landfill, , etc Consultation with relevant stakeholders which consists	√	√	√
		of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.			
	1230 - 1330	Lunch	√	√	√



Date	Time	Subjects	ARK	MHZA	ABB
	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.)	√	√	√
	1630 - 1700	Interim Closing Meeting	√	√	√
Monday, 06/11/2023 Sungai Tong Palm Oil Mill	0900 - 1230	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.	√	→	V
		Stakeholder consultations: Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.		\checkmark	
	1230 - 1330	Lunch	V	√	√
	1330 - 1630	Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc.	\checkmark	✓	√
	1630 - 1700	Interim Closing Meeting	√	√	√



Date	Time	Subjects	ARK	MHZA	ABB
Tuesday 07/11/2023 Fikri Estate	0900 - 1230	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, Scheduled waste management, worker housing, clinic, Landfill, , etc	√	√	√
		Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.			
	1230 - 1330	Lunch	√	√	~
	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.)	√	√	√
	1630 - 1700	Interim Closing Meeting	√	√	√
Wednesday 08/11/2023 Pelung Estate	0900 - 1230	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, Scheduled waste management, worker housing, clinic, Landfill, , etc	√	√	√
		Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.			
	1230 - 1330	Lunch	√	√	√



Date	Time	Subjects	ARK	MHZA	ABB
	1330 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.)	√	√	√
	1630 - 1700	Interim Closing Meeting	√	√	√
Thursday 09/11/2023 Pinang Emas Estate	0900 - 1230	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, Scheduled waste management, worker housing, clinic, Landfill, , etc Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.	V	√	√
	1230 - 1330	Lunch	√	√	√
	1330 - 1600	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.)	√	√	√
	1600 - 1630	Auditor discussion and closing meeting preparation	√	√	√
	1630 – 1700	Closing Meeting	√	√	√
Friday 10/11/2023		Auditor travel back to Kuala Lumpur	√	√	√



Date	Time	Subjects	ARK
Monday, 29/01/2024		Travelling from Kuala Lumpur to Kuala Terangganu	√
Tuesday, 30/01/2024	0900 - 0915	Opening Meeting: • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan	√
	0915 - 1145	Verification on Major NC closure evidence. Document review, site observation, workers/stakeholder interview (individual and group session) for: 1. 2418839-202311-M1 2. 2418839-202311-M2 3. 2418839-202311-M3	√
	1145-1200	Closing	√
		Auditor travel to Kuala Lumpur	√



Section 3: Assessment Findings

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

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. Please refer to Approved Time Bound Plan for details on the mills and estates of TDM Plantation Sdn. Bhd. Group.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	Except for the newly acquired Bukit Bidong Estate, all estates and mills in Malaysia has been certified within five years. Certification for sites in Indonesia has been deemed unnecessary as the operation and management control are already transferred to Ikhasas Sawit Sdn. Bhd. TDM has obtained the RSPO Approval on 29/02/2023. The submission was according to the template.	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.	Yes, there is newly acquired estate from Tabung Haji Plantation. The newly acquired TDM-YT Bukit Bidong Estate has been planned to be audited and certified by August 2026. TDM has obtained the RSPO Approval on 29/02/2023. The submission was according to the template.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	As of now there are no deviations on the period required for approval by the RSPO Secretariat.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes, the approved year of certification for TDM-YT Bukit Bidong Estate was deviated from 2023 to 2026. The justification for this was due to the estate was still recovering from financial and production losses. The approval for TDM was obtained on 29/03/2023, however during the audit, the ACOP report was available with todate of 2022.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No, there has not been any isolated lapses in the implementation of the plan	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No, there is no fundamental failure in implementation of the plan.	Complied



Un-Cortified Units or Holdings		
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.	No replacement of forest or any HCV area after dates defined in this Criterion 7. involving primary forest. Newly acquired TDM-YT Bukit Bidong Estate has already conducted it's HCV assessment by Sabarinah & Associates Sdn. Bhd.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new plantings since 1st January 2010 that requires compliance with the RSPO New Plantings Procedure.	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	Based on RSPO RACP tracker, there are 2 cases of Management Units with potential liability, Concept Note and Remediation Plan required. These 2 cases involving Indonesia operations which already been sold and TDM-YT Bukit Bidong Estate which already conducted it's HCV assessment and the report will be used to finish up LUCA and RaCP.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No labour dispute reported in the uncertified units. This is verified through the Internal Audit Reports and Complaint Records.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance reported in the uncertified unit (TDM-YT Bukit Bidong Estate). This is verified through the Internal Audit Reports and Compliants Records as well as Stakeholder Feedback.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes, internal audit was done and the uncertified unit which is TDM-YT Bukit Bidong Estate need to conduct HCV & SIA assessment which the report will be used to finalize LUCA report. HCV assessment was conducted by Sabarinah & Associates Sdn. Bhd. on 27th October 2022 and SIA was conducted by Green Sustainability Sdn. Bhd. on 18th October 2022.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	Yes, TDM-YT Bukit Bidong Estate is lacking it's HCV and SIA reports which already in progress of completion and pending reports. Communication with RSPO also already been made and they are waiting for the LUCA report to be finalized.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes. Stakeholders including NGO were consulted in the uncertified unit and documented.	Complied



3.2 Progress of scheme smallholders and/or outgrowers

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?	There are no Scheme Smallholders or Scheme Outgrowers within the Mill's Certification Unit.	Not Applicable			
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.					



Approved Time Bound Plan

Name of	Name of		Name of										GPS Coordinates (in decimal degree)		Total Certification			Date of Last TBP	REVISION OF THE TBP (Only applicable when revision is made)			
the Unit of Certification (UoC)	the Unit of Certification Country the Mills and Supply	nd Location Address	Latitude	Longitude	Managed Area (Ha)	Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year	Verified and Approved by CB	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									
KEMAMAN	MALAYSIA	KEMAMAN PALM OIL MILL	KM 121, Jerangau- Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4° 24′ 10.80″ N	103° 14′ 52.80″ E	21.94	Certified		2013	1st July 2022	No											
	MALAYSIA	JERNIH ESTATE	KM 121, Jerangau- Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4° 26′ 24.00″ N	103° 12′ 39.59″ E	3,135.60	Certified		2013	1st July 2022	No											
	MALAYSIA	PELANTOH ESTATE	KM 121, Jerangau- Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4° 24′ 19.23″ N	103° 14′ 59.64″ E	3,291.60	Certified		2013	1st July 2022	No											

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	MALAYSIA	TEBAK ESTATE	KM 121, Jerangau- Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4° 25′ 48.61″ N	103° 13′ 35.40″ E	3,293.63	Certified	2013	1st July 2022	No		
	MALAYSIA	AIR PUTIH ESTATE	KM 121, Jerangau- Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4° 8′ 23.99″ N	103° 7′ 47.99″ E	4,351.98	Certified	2013	1st July 2022	No		
	MALAYSIA	MAIDAM ESTATE	AM9, Bandar Ambs, 23400 Dungun Terengganu, Malaysia	4° 37′ 39.58″ N	103° 12′ 24.42″ E	914.08	Certified	2013	1st July 2022	No		
	MALAYSIA	GAJAH MATI ESTATE	Lot 140-141, Mukim Bukit Besi, 23200 Dungun Terengganu, Malaysia	4° 41′ 45.05″ N	103° 12′ 23.30″ E	3,882.78	Certified	2013	1st July 2022	No		
SUNGAI TONG	MALAYSIA	SUNGAI TONG PALM OIL MILL	Lot 7663, Batu 23, Jalan Kuala Terengganu- Kota Bharu, 21500 Setiu, Terengganu, Malaysia	5° 18′ 29.88″ N	102° 54′ 37.80″ E	20.79	Certified	2013	1st July 2022	No		
	MALAYSIA	FIKRI ESTATE	Jalan Kuala Terengganu- Kota Bharu, 21500 Setiu Terengganu	5° 19′ 21.50′′ N	102° 53′ 46.00″ E	3,711.05	Certified	2013	1st July 2022	No		



MALAYSIA	PELONG ESTATE	Jalan Kuala Terengganu- Kota Bharu, 21500 Setiu Terengganu Jalan Kuala	5° 16′ 55.56″ N 5° 15′	102° 49′ 59.52″ E 102° 53′	3,012.20	Certified Certified		2013	1st July 2022 1st July	No No			
	ESTATE	Terengganu- Kota Bharu, 21500 Setiu Terengganu	58.00" N	26.00" E					2022				
MALAYSIA	JAYA ESTATE	Jalan Kuala Terengganu- Kota Bharu, 21500 Setiu Terengganu	5° 23′ 43.61″ N	102° 53′ 03.32″ E	3,455.79	Certified		2013	1st July 2022	No			
MALAYSIA	PINANG EMAS ESTATE	Bukit Besi 23000 Dungun, Terengganu, Malaysia	4° 45′ 39.96″ N	103° 13′ 25.68″ E	3,870.18	Certified		2013	1st July 2022	No			
MALAYSIA	JERANGAU ESTATE	Jalan Jerangau, 21810 Ajil, Hulu Terengganu, Terengganu, Malaysia	4° 57′ 41.50″ N	103° 09′ 47.00″ E	1,480.93	Certified		2013	1st July 2022	No			
MALAYSIA	TDM-YT BUKIT BIDONG ESTATE	Lot 2092, Jalan Merang- Terengganu, Kampung Gong Tengah, 22100 Permaisuri, Terengganu	5° 29′ 20.51″ N	102o 55′ 30.20″ E	2,594.50	Not Certified	Aug-26	Uncertified	N/A	Yes	2026	The estate is currently facing losses of up to RM12MIL for 2022 and rehabilitation works are already planned and executed.	29/3/2023



3.3 Details of Nonconformities

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

During this Assessment there were three (3) Critical; one (1) Minor nonconformities and none Opportunity For Improvement raised. The Sungai Tong Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity						
NCR Ref #	2418839-202311-M1	Issued Date	09/11/2023			
Due Date	07/02/2024	Closure Date	30/01/2024			
Indicator & Category (Critical / Minor)	Critical - 2.3.2					
Statement of Nonconformity:	The process of obtaining the supplier is not evident.	he information as per indicat	or 2.3.1 for indirect FFB			
Requirement Reference:		FB, the unit of certification ob ermediaries, the evidence as				
Objective Evidence:	Sighted the records of FFB supplier to the mill, form with the details regarding information stated on 2.3.1 is available, however the information gathered smallholders is not evident, since the volume of FFB/ha for suppliers is for be not as industry standards (more then 25 mt FFB/ha). Thus, the Minor escalated to Major NC					
Corrections:		g FFB from the dealers, suppl information required as per ir				
Root Cause Analysis:	An official letter has been submitted to the dealers, suppliers and smallholde through email and WhatsApp in order to gather the information. However, to information given is insufficient and many of the suppliers were reluctant provide the necessary documentation and information.					
Corrective Actions:	To incorporate requirement indicator 2.3.1 into "Prosedur Operasi Standard Pembelian Buah Luar" for the purpose to ensure that dealers, suppliers, o smallholders fulfil the requirement.					
Assessment Conclusion:	 The procedure on purchasing the external FFB was established, with ti name Prosudur Operasi Standard Pembelian Buah Tandan Segar Ludated 20/01/2024 with Reference Number: TDM/KILANG/03 – 01/202 Verification on Indicator 2.6 found that the management has included the FFB Volume Location of Operation center MPOB License Company Registration Number Land Ownership status 					



2.	The management has ceased the external FFB suppliers from sending the FFB to the mill starting from second week of the November 2023. Records verified through FFB statement from the weighbridge system, which there are no FFB received for the month of December 2023 s the mill were due to major maintenance.
3.	As of 30/01/2024, the mill has received the external FFB from two suppliers name Federal Land Development (FELDA) and Kim Ma Oil Palm Sdn Bhd. Both records of FFB receiving were verified, and details as per the requirement stated in 2.3.1 was available for review. Thus, the Major Non Conformance was effectively closed.

Non-conformity						
NCR Ref #	2418839-202311-M2	Issued Date	09/11/2023			
Due Date	07/02/2024	Closure Date	30/01/2024			
Indicator & Category (Critical / Minor)	Critical – 3.6.1					
Statement of Nonconformity:	The process of risk ident implemented.	ification especially on the	CHRA is not effectively			
Requirement Reference:	All operations are risk ass procedures are documented	sessed to identify H&S issuddentify and implemented.	es. Mitigation plans and			
Objective Evidence:	Upon verification at each visited estate, the presence of the Chemical Hazard Risk Assessment (CHRA) was noted. However, after cross-referencing with the Chemical Register and inspecting the chemical store during the visit, it was identified that some chemicals and fertilizers listed in the register were not assessed in the CHRA. Consequently, a Major Non-Conformance (NC) has been raised. Normative Reference: Regulation 10, Occupational Safety And Health Act 1994 [Act 514] Occupational Safety And Health (Use And Standards Of Exposure Of Chemicals Hazardous To Health) Regulations 2000					
Corrections:		al of the CHRA report has basessment will be conducted				
Root Cause Analysis:	For Pelung Estate, the current CHRA report was issued on 25 November 2019. Boromag and Compound 38 were recently received in September 2023. Therefore, the fertilizer was not assessed yet in the CHRA Report. Fikri and Pinang Emas Estate is utilizing a different brand of pesticides and fertilizer, but the active ingredients are the same as listed in the CHRA report.					
Corrective Actions:	The practices for updating the list of pesticides and fertilizer in the CHRA report will be continuously conducted and monitored by the Assistant Manager together with the Compliance Clerk. Any new pesticides and fertilizers will be informed of and discussed in the Safety and Health Committee (SHC) meeting.					
Assessment Conclusion:	Jaya Estate –					



The management conducted the CHRA on 15/01/2024, verified photos, attendance records, and Purchase Order LJY111/23. Dr Liwauddin Bin Mohamad (DOSH Registration No: HQ/12/ASS/00/306) conducted the assessment. The report was verified with Reference Number: HQ/12/ASS/00/306-2024/0003. CHRA and Chemical Register issues were discussed during the safety meeting on 10/12/2023.
Pinang Emas Estate –
The CHRA on 02/01/2024 was verified with photos, attendance records, and Acceptance Letter dated 05/12/2023 (Ref No: LPE/CHRA/23/01/1(1)). Dr Yasriza Yahaya (DOSH Registration No: HQ/10/ASS/00/8) conducted the assessment. The report was verified with Reference Number: HQ/10/ASS/00/8/2024/001. CHRA and Chemical Register issues were discussed during the safety meeting on 20/12/2023.
Pelung Estate –
The CHRA from 19/12/2023 to 25/01/2024 was verified with photos, attendance records, and Acceptance Letter dated 28/11/2023 to Medi-Ihsan OSH Sdn Bhd. Dr Liwauddin Bin Mohamad (DOSH Registration No: HQ/12/ASS/00/306) conducted the assessment. The report was verified with Reference Number: HQ/12/ASS/00/306-2024/0002.
Fikri Estate –
The additional CHRA Assessment on 15/01/2024 was done through document submission, verified by photos and records. Dr Yasriza Yahaya (DOSH Registration No: HQ/10/ASS/00/8) conducted the assessment. The report is available for review. CHRA and Chemical Register issues were discussed during the safety meeting on 13/12/2023.

Verification confirms that all estates conducted the CHRA, and after discussions, Major Non Conformance issues were closed.

Non-conformity					
NCR Ref #	2418839-202311-M3				
Due Date	07/02/2024	Closure Date	30/01/2024		
Indicator & Category (Critical / Minor)	Critical - 6.2.2				
Statement of Nonconformity:	Compensation for all work performed was inaccurately recorded in payroll system documents and employment contract was not incompliance with Employment Act 1955.				
Requirement Reference:	Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.				
Objective Evidence:	Pelung Estate				



i) Information recorded in the check roll book for harvester (piece rated), worker ID: PL1100948 as per below:

Task/work performed	Details	Rate per bunch/allowance rate	Total compensation paid
Buffer zone	Total harvested bunches: 386 *Inclusive work on rest day/Friday (25/11/2022)	RM2 per bunch	RM 772 inclusive of 40 harvested bunches on 25/11/22 *40 bunches was not calculated as double rate of pay
Public holiday work (field 17A2)	19, 20 & 28/11/22 Total harvested bunches: 420	RM 0.50 per bunch	RM 150 for 300 bunches *120 bunches was not paid
Rest day work, PH work	19, 20, 25 and 28/11/22	RM 50 per day	RM 100 paid

Inconsistent information recorded in the pay slip compared to check roll book for the said worker. 40 of harvested bunches on rest day (25/11/22) was not paid double rate of pay. Furthermore, harvested bunches (420) were not paid in full for public holiday work on 19, 20 & 28/11/22 and allowance for PH was only paid for 2 days.

ii) Contract of service between Koperasi Sejahtera and employee with ID: 770112035621 under clause 4: "potongan KWSP akan dilakukan selepas tamat tempoh percubaan" which stipulate a term or condition of service which is less favourable to an employee.

iii) Incorrect wages calculation in Plantware for the following samples:

Wages (normal day – piece)	Ordinary rate of pay	Estate/workers ID
RM 2,232.85 (14 days)	22.16	Fikri Estate (FK1801085)
RM 1,582.72 (18 days)	31.46	Fikri Estate (FK2301449)
RM 1,533.85 (26 days)	51.77	Pinang Emas Estate (PE2301606)



	Normative reference:
	i) Employment Act 1955, section 60(3)(d) - In the case of an employee employed on piece rates who works on a rest day, he shall be paid twice his ordinary rate per piece.
	ii) Employment Act 1955, Contract of Service, section 7: More favourable conditions of service under the Act to prevail; term or condition of service which is less favourable to an employee than a term of condition of service prescribed by this Act or any regulations.
	iii) MAPA/NUPW and other general employees and fringes benefits agreement, 2019
	iv) Ordinary rate of pay (ORP): defined whether calculated by the month, the week, the day, the hour, or by piece rate, or otherwise, which an employee is entitled to receive under the terms of his contract of service for the normal hours of work for one day, but does not include any payment made under an approved incentive payment scheme or any payment for work done on a rest day or on any gazetted public holiday granted by the employer under the contract of service or any day substituted for the gazetted public holiday.
Corrections:	i. The insufficient payment has been calculated, and the payment will be made on November 2023 salary.
	ii. To hold a meeting with Koperasi Sejahtera and brief them on the requirements of the Employment Act 1955. They must make EPF deductions and contributions to their workers and stated in the worker's payslip. A reminder letter was sent to Koperasi Sejahtera to correct this matter.
	iii(b). FK2301449 – To revise each ORP payment item and update the type of employee according to work type.
	iii(c). PE2301606 - The insufficient payment for the month of June 2023 will be paid on November 2023 salary – Public holiday (RM5.92 x 3 days = RM17.76).
Root Cause Analysis:	i. Management has informed all employees that they are not allowed to go out to work on 25/11/2023 (Friday), which is a rest day, and 28/11/2023 (Monday) which is public holiday, but worker ID: PL1100948 (Nurali) does not follow the management's instruction. Therefore, bunches and incentive payments are not taken into account for the said day.
	The employee's salary calculation by the responsible staff is inaccurate because it was calculated manually and there was no review by the Assistant Manager/ Chief Clerk to ensure that the calculation is correct.
	ii. Koperasi Sejahtera is the contractor for the FFB dispatch. There is an agreement available between Pelung Estate and the contractor, which indicates that the contractor must comply with the requirement of RSPO and MSPO. No EPF



	contribution is made to the contract worker due to lack of proper training and guidelines from the estate.
	iii(a). FK1801085 – Spraying fee allowance is not in the ORP calculation category, and no errors in the system occurred. ORP that is less than the minimum wage will be made as additional payment.
	iii(b). FK2301449 $-$ Error occurred due to incorrect ORP setup for loader incentive payment. However, for every month, the ORP that is less than the minimum wage will be made as additional payment .
	The loader incentive allowance was incorrectly set up in Plantware by payroll staff, causing its undeclared status as one of the payments in the ORP calculation category. The PIC was not familiar with the Plantware system.
	iii(c). PE2301606 – He is a harvester, and at the same time carries out pruning work to meet the minimum wage, RM57.69 per day. The pruning fee is paid at the rate of RM5 per palm and RM2 per palm. The pruning fee allowance is not in the ORP calculation category, and no errors in the system occurred. ORP that is less than the minimum wage will be made additional payment, i.e., the next month's payment in accordance with the ORP rate is sick leave and public holiday.
	The ORP is supposed to be paid to the worker accordingly and comply with the minimum wage. Although the ORP had been monitored to ensure the rate was correct, mistakes sometimes occurred due to a lack of information about the worker's daily work, especially during changing work from harvesting to pruning.
Corrective Actions:	i. Prior notice will be given to all workers if the management does not allow them to work on a rest day or public holiday, supervised by the Assistant Manager and Field Assistant.
	Assistant Manager/Chief Clerk to double check the worker's payslip (rest day, public holiday, total bunches, etc) before account closing to ensure the wages paid aligned with the recorded checkroll.
	A memorandum letter will be issued to ensure the checkroll and payslip will be checked by the PIC before account closing.
	ii. To conduct training for the contractors on the requirements of the Employment Act 1955 and to assist the contractor in making proper contributions and deductions (EPF) as per the requirement of the Employment Act 1955.
	iii. Improvement by using the piece-rated payment module, where the data will be keyed in by entering the hectarage and the price offered. Piece-rated is included in the ORP calculation.
	The ORP calculation will be monitored and checked by the Chief Clerk to ensure no mistakes happen during keying the information in the payroll system or after keying in the system. If there is an issue with the calculation of the ORP, the IT department must be notified for review and proper training will be conducted to prevent a recurrence of the same issues.
Assessment Conclusion:	Pelung Estate



 Koperasi Sejahtera – Training on legal compliance has been conducted on 26/11/2023 with the reminder letter sent to the Koperasi Sejahtera dated 26/11/2023. Sighted the salary slip with the EPF deduction is available for review. Deduction from workers and contribution details from employer were available for review.
2. Details for workers ID PL1100948 – the management has reimbursed the salary during the November 2023. Details of the salary slip and calculation details were verified.
3. Memo to Assistant Manager, Chief Clerk and Clerk were issued on 26/11/2023 for the checking of workers salary before the account closure. This is to make sure all salary were prior to account closure and must be inline with the checkroll.
Ladang Fikri / Pinang Emas
1. Training on Plantware System were conducted during the Chief Clerk and Payroll Clerk meeting on 14/12/2023 at Paya Bunga Hotel, Kuala Terangganu.
 Plantware System – Verification made that the Ordinary Rate Of Pay were not mark for workers working in spraying and FFB loading, which is the core work at estate.
Sample taken for the same worker for the month of December 2023 found that the ORP were above the minimum wages which was at 59.09 respectively for the Fikri Estate and Pinang Emas Estate, the worker public holiday pay for the month of June 2023 were reimbursed in the month of November 2023.

Non-conformity				
NCR Ref #	2418839-202311-N1			
Due Date	09/11/2023	Closure Date	"Open"	
Indicator & Category (Critical / Minor)	Minor - 3.4.2			
Statement of Nonconformity:	Social management plan was not comprehensively developed with participation of affected stakeholders.			
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:	No records of consultation with China Communications Construction Company (M) Sdn Bhd (CCC) in the process of 2023' SIA management plan development for Fikri and Jaya Estate. CCC was also not invited in the latest North Zone stakeholder's meeting on 17/10/2023. Currently CCC is in progress of constructing ERCL project which affecting some stretch/area within Jaya and Fikri Estate.			
Corrections:	To insert or place China Communications Construction Company (M) Sdn. Bhd. (CCC) into Fikri and Jaya stakeholder's listing.			



	The existing Social Impact Assessment (SIA) management plan will be reviewed and revised accordingly for both estates (Fikri and Jaya Estate).
Root Cause Analysis:	Most of the time, China Communications Construction Company (M) Sdn Bhd (CCC) is communicating with the representative from the Operation Department at the headquarters level and does not involve staff from the estate. That is why CCC is not listed in Fikri and Jaya stakeholder's listing.
Corrective Actions:	In the future, whenever there is a new stakeholder, the estate will communicate with the Sustainability or Operation Department to review and update the list/plan.
Assessment Conclusion:	The CAP is accepted, further verification will be conducted in the next assessment.

Opportunity for Improvements			
OFI#	Description		
OFI 1	N/A		

Positiv	Positive Findings			
PF#	Description			
PF 1	Strong culture of excellence teamwork with cross functional teams were observed working collaboratively, sharing knowledge and collectively addressing challenges.			
PF 2	Efficient document retrieval, with the implementation of simple and fast well-structured processes to organize and retrieved documents swiftly.			

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity					
NCR Ref #	2288561-202212-M1				
Due Date	14/03/2023	Closure Date	12/02/2023		
Indicator & Category (Critical / Minor)	2.2.2 Critical				
Statement of Nonconformity:	EPF and SOCSO contribution is not according to Employees' Social Security Act 1969, Employee Provident Fund 1991 and employment contract.				
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:	Verification has been done by the auditor on compliance of legal requirement for contractor in Fikri Estate and found out that EPF and SOCSO contribution made not				



	according to Employees' Social Security Act 1969, Employee Provident Fund 1991			
	and employment contract. Details as per below			
	Details as per below			
	Contractor: Technopalm Resources Sdn Bhd contract number Tech/LFK/2022			
	Workers A	Total salary	Actual amount	Amount as per requirement
	EPF Contribution	RM1,800	RM250.00	13%, RM234
	SOCSO contribution		RM60.35	RM32.35
	Minor Nonconformities indicator. Hence the no			ous audit at the same to Major NCs.
Corrections:	Meeting and discussion regarding compliance on legal requirement and company policies among management and contractors has been conducted on 26/09/2022 (Fikri Estate) and 16/11/2022 (North Zone). Reminder letter and training was delivered to Technopalm Resources Sdn Bhd on 20/12/2022.			
Root Cause Analysis:	Technopalm Resources Sdn Bhd is one of the contractors for replanting program and first worked for Fikri Estate in November 2021. They were well notified and acknowledge about the compliance on legal requirements. However, there were some confusions on their admin side during the calculation of the value for deduction due to the variation percentage for EPF and SOCSO.			
Corrective Actions:	Management meeting at operation unit, Fikri Estate decided to stop collaboration with those who failed to fulfil and comply on legal requirement. Memo regarding this matter will be blast to all contractors immediately. Compliance clerks will conduct monthly inspection and checks to ensure compliance is met. For instance, the contractors must submit proof or documents of EPF and SOCSO deductions (such as Borang 8A) together with the work agreement.			
Assessment Conclusion:	Major NC Close Out			
	1. Memo has been distributed to all contractors dated 27/12/2022. Training to contractors has been conducted on 12/12/2022. Refer Memo "Surat Peringatan Pematuhan Terhadap Kata Kerja Dan Polisi Syarikat." Contractors has been told on stop collaboration with those who failed to comply as per evidence training materials as per Memo.			
	2. Monthly inspection by compliance clerk to check the contractors compliance has been verified. Refer latest record 07/02/2023.			
	3. Interview has been conducted to compliance clerk found they have good understanding on the training given and show good awareness on monitoring of the contractors issue.			
	Based on the above evidence, the major Non-Conformity is closed effectively on 12/02/2023. Continuous implementation will be further verified in the next assessment.			
Effectiveness Closure (for previous audit closed Critical NC):	Monthly inspection on contractor's compliance has been verified by compliance clerk to check continuous compliance on legal requirement. Based on payslips and related records for SOCSO (8A form) and EPF verification, no recurrence of issue observed at all visited operating unit. The previous major NC is remain closed.			



Previous Audit Critical (Major) Non-conformity				
NCR Ref #	2288561-202212-M2			
Due Date	14/03/2023	Closure Date	12/02/2023	
Indicator & Category (Critical / Minor)	3.6.2 Critical			
Statement of Nonconformity:	There is no HIRARC register net of FFB and no certificate	ed for Working at height duri of fitness for scissor lift.	ng putting and removing	
Requirement Reference:	The effectiveness of the H& monitored.	S plan to address health and	safety risks to people is	
Objective Evidence:	 Based on the HIRARC records, the monitoring of identification of some safety hazards was not effectively implemented. Among the activities which has yet to be registered in the HIRARC were: Working at height during putting on net to cover FFB in a truck (Jerangau, and Pelung Estate) Working at height during removing of net that is covering FFB in a truck (Pelung Estate) Fikri and Tayor estates have been using scissor lift trailer attached to farm tractor in their FFB evacuation operation. However, there is no evidence that the estates have obtained the certificate of fitness in accordance with the 			
Corrections:	Factories and Machinery (Notification, Certificate of Fitness and Inspection) Regulations, 1970. To identify and include working at height (WAH) during net installation and removal into the HIRARC.			
	Letter and email to notify top management and related person regarding this issue has been delivered on 12th December 2022 and required action will be taken. Official discussion and meeting between TDMP and DOSH to get their advice on how to obtain CF for scissor lift.			
Root Cause Analysis:	The hazard working at height during putting/ removing of net to cover FFB was not properly identified and reviewed by the estates. Estate operation management did not have communication with the company's SHO/ sustainability team to include the said jobs into the HIRARC, which were updated annually. Estate unaware about the requirement certificate of fitness for scissor lift. Estates have annual air compressor renewal inspections with the Department of Safety and Health (DOSH). During those years, we received no comment/report/advice from the Department regarding the certificate of fitness for scissor lift. The awareness training on legal was not effectively conducted to the PIC.			
Corrective Actions:	The practices for updating the documentation of HIRARC will be continuously conducted and monitored by the PIC together with HIRARC review committee. Any new activities will be discussed in SHC meeting. The memorandum will be distributed to estates/mills of TDM Plantation Sdn Bhd, as a reminder. Follow up will be discussed during Management Meeting on monthly basis. Required action has been taken to ensure utmost safety and compliance with equipment certification. Estate has communicated with DOSH officer regarding the certification process. Based on conversation with Mr. Irwan Sunardi (DOSH officer)			



	on 21st December 2022 at 10:31 a.m., to proceed with the application, approval letter from DOSH Putrajaya for mentioned equipment must be provided and submitted. Next step will be taken as required to obtain the certificate process. The awareness training on legal will be given to the PIC in order to keep them updated with the requirements.		
Assessment Conclusion:	Major NC Close Out		
	1. HIRARC on Netting installation and Netting Removal has been documented and updated in the HIRARC dated 07/02/2023 at Jerangau Estate and Pelung Estate. For Jerangau Estate meeting conducted on 08/02/2023. Prepared by Compliance clerk and endorsed by the Manager.		
	2. Memo has been distributed to all management units as per evidence email dated 07/02/2023. Sample of meeting regarding on this Memo has been conducted on 08/02/2023 at Jerangau Estate and 09/02/2023 at Pelung Estate.		
	3. Refer letter to Pengarah, JKKP Negeri Terengganu dated 26/01/2023 titled "Permohonan Permit Mesin Angkat (PMA) / Certificate of Fitness (CF) Bagi Mesin Scissor Lift Trailers di TDM Plantations Sdn Bhd (TDMP) with reference document TDMP/OD/07/60-10. Sighted evidence of drawing as per Appendix A and B. Process on certification was in progress.		
	4. Training online with DOSH Department has been planned on 15-16/03/2023 as per evidence letter dated 06/02/2023 to DOSH Officer with reference letter TDMP/OD/07/60-10.		
	5. Interview has been conducted to sample workers (Trailer Driver, Tractor Driver at Pelung Estate, Jerangau Estate and Fikri Estate) found they have good understanding on the training given and show good awareness on safety at respective area.		
	6. Site visit at estate found all correction and corrective action has been implemented.		
	Based on the above evidence, the major Non-Conformity is closed effectively on 12/02/2023. Continuous implementation will be further verified in the next assessment.		
Effectiveness Closure (for previous audit closed Critical NC):	Regarding the scissor lift, the management has received the reply from DOSH on 14/02/2023 with Ref No: JKKP.T.127/381/6.JLD.10(7), stating that the design is in need to get the approval and advice the management to engage with DOSH HQ to get the design approval from DOSH HQ. As 02/11/2023 the management currently in preparing the material to visit DOSH HQ for the verification and license approval.		
	Records of training conducted with DOSH is available for review dated 15/03/2023. Site visit at all estate found that the netting installation were conducted as per the recommendation stated in HIRARC develop by the management. Thus the Major NC is remained closed.		

Previous Audit Critical (Major) Non-conformity				
NCR Ref #	2288561-202212-M3	Issued Date	15/12/2022	
Due Date	14/03/2023	Closure Date	12/02/2023	



Indicator & Category (Critical / Minor)	6.2.4 Critical		
Statement of Nonconformity:	Workers quarters has not been maintained in comfortable, hygiene and good condition.		
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:	Jerangau Estate		
	There are 3 workers quarters for Jerangau Estate which is in Jerangau Division (Local and foreigner) and at Landas Estate. During the site visit at workers quarter at Jerangau Estate, found out that the workers quarters has not been maintained in good conditions.		
	Overdue grass cutting at the back of the housing quarters		
	2. Blockage of drainage		
	3. Poor waste management. Sighted waste like plastic, tyres, broken grass cutter in the drain and scattered at the workers quarters		
	4. Broken window glass and damaged mosquito netting		
	5. Leakage roof at foreign workers housing toilet		
Corrections:	Management has taken immediate action as below:		
	1) Additional two (2) units of grass cutter machines and to replace the current contractor with the new one.		
	2) Arrange for one (1) JCB unit to desilt the main drain and a few workers to clean the drainage.		
	3) Closely monitor domestic waste management and appoint contractors to collect domestic waste twice a week.		
	4) The management had purchased new window glass and a mosquito net to replace the broken/ damaged ones.		
	Immediately hire contractors to repair the roof of the foreign workers' housing toilet.		
Root Cause Analysis:	 Management was ineffectively monitors the source of the issue as below: The car garage construction work causes soil to enter the drain and clog it. The attitude of workers who do not keep the housing area clean. The rainy season caused some cleaning work could not be carried out immediately. No complaint received for objective evidence no.4 and no.5. 		
Corrective Actions:	Monitoring on weekly inspections record will be updated by details up the Section to check involve on Linesite (Drain, Condition of Roof, Electrical Wiring and Domestic Waste).		
	2) The management will rearrange grass cutting schedule in the line site area from one round into two round per month.		



	 Training with evaluation will be conducted to workers to provide information to housing residents to submit a complaint form if there is damage to the housing and reminded to always keep the line site area clean . Weekly inspection will be conducted by Compliance Clerks and verified by the Assistant Manager. The training will be given to the PIC with training evaluation to refresh their knowledge. 	
Assessment Conclusion:	Major NC Close Out	
	1. Weekly inspection form has been updated on Section "Kawasan Sekeliling," "Longkang Parit," "Pendawaian Eletrik" and "Mosquito Netting." Refer Linesite Inspection Record dated 02/01/2023, 09/01/2023, 16/01/2023 and 23/01/2023	
	2. Refer re-schedule of grass cutting as per dated 31/01/1023. Refer Contract Agreement "Menjalankan kerja-kerja pemotong rumput di Ladang Jerangau Bahgian Jerangau bagi Bulan Januari 2023 (2 Pusingan)	
	3. Training to resident has been related Complaint Form in damage issue at housing area has been conducted on 10/01/2023. Training Evaluation training has been documented dated 11/01/2023.	
	4. Reminder to resident has been given on Cleanliness Issue has been given dated 10/01/2023. Sighted training materials, attendance and photos.	
	5. Compliance clerk has been given training on line site inspection dated 11/01/2023.	
	6. Interview has been conducted to sample compliance clerk found they have good understanding on the training given and show good awareness on safety at respective area.	
	7. Site visit at linesite area found all correction and corrective action has been implemented.	
	Based on the above evidence, the major Non-Conformity is closed effectively on 12/02/2023. Continuous implementation will be further verified in the next assessment.	
Effectiveness Closure (for previous audit closed Critical NC):	Weekly inspection has been continuously carried out by the Compliance Clerks and verified by the Assistant Manager. Records of weekly inspection for the month of September and October 2023 were made available for verification. Any negative comment reported will be further followed up by the management to ensure prompt response taken by the respective person in charge. No recurrence of issue observed, thus the previous major NC is remain closed.	

Previous Audit Critical (Major) Non-conformity				
NCR Ref #	2288561-202212-M4	Issued Date	15/12/2022	
Due Date	14/03/2023	Closure Date	12/02/2023	
Indicator & Category (Critical / Minor)	6.7.3 Critical			
Statement of Nonconformity:	Safety harness was not equipped for FFB Truck at estate and security guard at mill, and Badang Driver used Wellington Boot during FFB evacuation.			



Requirement Reference:	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
Objective Evidence:	During the site visit, it was observed that some of the workers were not wearing PPE in accordance with the company's PPE Matrix. Among the cases found are as follows: 1. Safety harness was not equipped during CPO tank seal checking by security		
	guards at the mill		
	2. At Jerangau Estate, based on interview with the management, safety harness was not equipped by the driver during putting on or removing of net that covers the FFB in the truck		
	"Badang" driver was using Wellington Boot instead of safety shoes and not using ear plugs during FFB evacuation at Jerangau Estate. Tractor driver was Wellington Boot instead of safety shoes during FFB evacuation operation at Tayor Estate		
Corrections:	The PPE matrix has been revised by the Sustainability and Compliance Unit, and the Memo/SOP has been endorsed to the estates and mills on 19th December 2022.		
Root Cause Analysis:	The Standard Operating Procedure for PPE was issued on 11th November 2021 and applies to all staff, workers, contractors, and visitors to any estates/mills of TDM Plantation Sdn. Bhd. However, the wearing of PPE does not fully cover the cases as per objective evidence during the audit session because lack of supervision from the management .		
Corrective Actions:	Workers to undergo training to ensure that the PPE wearing, and procedure is followed. Those who fail to comply will receive a show-cause letter. Training evaluation will be documented to ensure the effectiveness of the training.		
	The Assistant Manager and staff in charge have been reprimanded to be stricter on the enforcement of SOPs pertaining to safety and PPEs. The training will be conducted for both workers and management for better understanding and execution.		
Assessment Conclusion:	Major NC Close Out		
	1. PPE Matrix has been revised dated 19/01/2023 on section Scope of Protection Foot (Use of wellingtons boots and safety shoes), Miscellaneous (Safety Harness Set), Era (Eraplugs).		
	2. Training to workers on PPE has been conducted on 01/01/2023 at Tayor Estate and Jerangau 18/01/2023. Sighted evidence of training materials, attendance and photos. Training evaluation has been documented on 01/01/2023 and showed all workers were understand on the training.		
	3. Memo to the Management Teams has been given as per letter dated 01/01/202 with refence number TDMP/LTY/PPE/23 with title "Pelaksanaan PPE Kepac Pekerja". Refer training PPE has been conducted on 01/01/2023 at Tayor Estate Sighted evidence of training materials, attendance and photos. Training evaluation has been documented on 01/01/2023 and showed all management teams were understand on the training.		
	4. Interview has been conducted to sample management teams and workers (Tractor Driver MB Driver and Security Guards) found they have good		



	understanding on the training given and show good awareness on safety at respective area.
	5. Site visit at estate Harvesting area found all correction and corrective action has been implemented.
	Based on the above evidence, the major Non-Conformity is closed effectively on 12/02/2023. Continuous implementation will be further verified in the next assessment.
Effectiveness Closure (for previous audit closed Critical NC):	Site visit at mill during the CPO despatch process was conducted. Verification made that the security was wearing safety harness to inspect the seal on top of the tanker. Site visit at each sample estate found that the lorry driver installing the netting were wearing proper safety harness during the installation of netting. The is no reoccurrence of Major NC, thus this NC was effectively closed.

Previous Audit Minor Non-conformity				
NCR Ref #	2288561-202212-N1			
Due Date	09/11/2023	Closure Date	09/11/2023	
Indicator & Category (Critical / Minor)	3.3.2 Minor			
Statement of Nonconformity:	Chemical activities effect was sighted at water ways area			
Requirement Reference:	A mechanism to check consis	tent implementation of proce	dures is in place.	
Objective Evidence:	During site visit at Pelong Estate, P21A and P18A2, it was noted portion of chemical activities near the water ways. It was not in line with Standard Operating Procedure Immature upkeep dated 01/05/2011 Section 5.1.1: Do not pollute waterways and 4.1.14.6: Water way must not be contaminated by the chemical used for the job.			
Corrections:	FA and workers will be given a reminder that no activities involving chemical can be done at the buffer zone area during muster call every morning. Estate management to identify the river buffer zone and to stop chemical activities near the water ways immediately. Those who fail to comply will receive a show-cause letter.			
Root Cause Analysis:	The workers/ sprayer does not notice the buffer zone area because there is no signage provided to indicate it and the training given is not effective. Lack of training for the workers and lack of supervision and action from the Assistant Manager (AM) and Field Assistant (FA).			
Corrective Actions:	To provide relevant signage near the water ways (river buffer zone) and the training related to the buffer zone area will be done to the workers and staffs. The FA and AM will monitor on the spraying activities. A report or checklist will be signed by the Manager.			
Assessment Conclusion:	Site visit at buffer zone found sampled estate found that buffer zone were clearly marked with signboards were available. No sighting of spray mark was available during the audit. Training related with the buffer zone was conducted at each estates. Thus the Minor NC was effectively closed.			



Previous Audit Minor Non-conformity				
NCR Ref #	2288561-202212-N2	Issued Date	15/12/2022	
Due Date	09/11/2023	Closure Date	Escalated to Major NC	
Indicator & Category (Critical / Minor)	2.3.2 Minor			
Statement of Nonconformity:	The evidence as listed in Indicator 2.3.1. has yet to be obtained for most indirectly sourced FFB by the mill.			
Requirement Reference:	For all indirectly sourced FFB, the unit of certification obtains from the collection centers, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.			
Objective Evidence:	There are six collection centers supplying FFB to Sungai Tong POM, namely Tan Sing How, Syarikat Warisan, Sentong Sawit, Kim Ma Oil Palm, Pertubuhan Peladang Negeri Terengganu, and MBA Palm Trade. However, the evidence as listed in Indicator 2.3.1. has yet to be obtained for most indirectly sourced FFB by the mill, especially those under Kim Ma Oil Palm, Syarikat Warisan, and MBA Palm Trade. The very high yield/ha in 2022 for Syarikat Warisan and MBA Palm Trade is also an indication that the most of their suppliers has yet to be identified.			
Corrections:	A template has been developed and distributed to the dealers and smallholders in order to get the information available for mill safekeeping and reference. On 18th January 2023, a short discussion will be held with dealers and HQ members to discuss the requirement of RSPO regarding to FFB's supplies to TDMP collection centres.			
Root Cause Analysis:	Some of the dealers claim that the requested information is private and confidential.			
Corrective Actions:	Mill management has made the decision to discontinue accepting FFBs from dealers who have not complied with the requirements.			
Assessment Conclusion:	Sighted the records of FFB supplier to the mill, form with the details regarding the information stated on 2.3.1 is available, however the information gathered from smallholders is not evident, since the volume of FFB/ha for suppliers is found to be not as industry standards. Thus, the Minor NC is escalated to Major NC			

Previo	Previous Audit Opportunity for Improvement			
OFI#	Description			
OFI 1	OFI Statement: N/A			
	Verification / Follow-up actions: N/A			

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category	P&C	Issued Date	Status & Date (Closure)
	(Critical / Minor)	Indicator		



2288561-202212-M1	Critical	2.2.2	15/12/2022	Closed on 12/02/2023
2288561-202212-M2	Critical	3.6.2	15/12/2022	Closed on 12/02/2023
2288561-202212-M3	Critical	6.2.4	15/12/2022	Closed on 12/02/2023
2288561-202212-M4	Critical	6.7.3	15/12/2022	Closed on 12/02/2023
2288561-202212-N1	Minor	3.3.2	15/12/2022	Closed on 09/11/2023
2288561-202212-N2	Minor	2.3.2	15/12/2022	Escalated to Major NC
2418839-202311-M1	Critical	2.3.2	09/11/2023	Closed on 30/01/2024
2418839-202311-M2	Critical	3.6.1	09/11/2023	Closed on 30/01/2024
2418839-202311-M3	Critical	6.2.2	09/11/2023	Closed on 30/01/2024
2418839-202311-N1	Minor	3.4.2	09/11/2023	"Open"

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Sungai Tong Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace. 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)					
Internal	Gender committee representative, union representative (NUPW), worker's representative by nationality	Face to face					
Contractor	KT Mega Steel Sdn Bhd, ARJ Structure Sdn Bhd, Samsudin Sulong, Bismi Agro	Face to face					
Government department	School representative, SMK Padang Pilut, SK Kampung Jaya, SM Sg Tong	Face to face					
Communities	Kg Selamat, JPKK Bkt Nenas	Face to face					
External	Syarikat Air Terengganu (SATU)	Face to face					



Stake	eholders comment
1	Feedbacks:
	Contractors & suppliers – No pending payment issue raised by contractor. They were also aware on the code of business ethics with TDMP and the whistle-blowing policy which will protect them from any misconduct from the management.
	Audit Team verification and response: No further issue.
2	Feedbacks:
	School representative – Full support given by the estate management for any programme organized such as sports day and motivational talk for school children. TDMP management is always open for any request or assistance whenever required. One concern raised with regards to school children attendance has to be improved from time to time.
	Audit Team verification and response:
	Estate and mill management will continue to give awareness to workers to improve on absenteeism issue.
3	Feedbacks:
	Gender Representatives – They are aware of the function of the committee and reported that there was no sexual harassment case reported. They were given equal opportunity to work in the company regardless of gender.
	Audit Team verification and response: No other issue.
4	Feedbacks:
	Worker's representative (Indonesia, India) No issue with the management and always opens for consultation and assistance. Equal opportunity to all
	workers regardless of their nationality, gender and race.
	Audit Team verification and response:
	No other issue.
5	Feedbacks:
	Village representative (JPKK) Bukit Nenas, Kampung Selamat Good feedback received from the village representative. No encroachment and overplanted issue occurred at the boundary of estate and village.
	Audit Team verification and response:
	No other issue.
6	Feedbacks:
	Syarikat Air Terangganu (SATU)
	Good feedback were given by the company representative which stated that TDM has given full cooperation when SATU required assistance.
	Audit Team verification and response: No other issue.



List of land owner / user contacted								
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)		Compliance on the agreement terms and conditions			
N/A	N/A	N/A	N/A	N/A	N/A			

Previous land owner / user comment						
	Feedbacks: Not applicable since all estates within Sg Tong Certification Units belongs to the Terengganu					
	State Government Incorporated Company that owns 100% stake in TDM.					
	Audit Team verification and response: No further verification required.					

3.5 Impartiality and conflict of interest

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



Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Sungai Tong Palm Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Sungai Tong Palm Oil Mill is remain certified.

The second of th	
Report prepared by	Acceptance of Assessment Conclusion
Name: AHMAD RUFI BIN ABU TALIB KHAN	Name: MOHD ZAMBRY BIN ABDULLAH
Company Name: BSI SERVICES MALAYSIA SDN BHD	Company Name: TDM PLANTATION SDN BHD
Title: CLIENT MANAGER	Title: PLANTATION CONTRLLER
Signature:	Signature: (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.) MOHD ZAMRY BIN ABDULLAH Plantation Controller (PC)
Date: 14/02/2024	Date: 15/02/2024 Plantation Sdn. Bhd.



Appendix A: Summary of Findings

Criterio	on / 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, is 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 -	All documents are available at the operating sites and head office. There is no restriction reported by the stakeholders regarding obtaining of information or documents. The access of any relevant documentation is made available upon request. Procedure for communication which includes the information request is available at notice boards of the estates and mill. The company polices is made available at notice boards of the estates and mill vicinity. Available a statement mentioning document readily available to public not limited to: • Land ownership title • OSH Plan • SIA Report • HCV report and related documentation • Continuous Improvement Plan • Pollution Prevention Plan • Environmental management/Monitoring Plan • Communication and Complaint/Grievance Procedure • Consultation Procedure	Complied			

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		Contributions to community development	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	Communication Flowchart with Mill/ Estate Management was developed where it has clearly described the process of request of information/ report. Timeline to respond and solve is within 28 working days. The company has implemented Request and Response Form for the stakeholders. Information available in Bahasa Malaysia and English.	Complied
1.1.3	(C) Records of requests for information and responses are maintained Critical (Major) compliance -	The company has implemented form for records of Communication with Stakeholders to record all the requests from the stakeholders. These records of information and responses are maintained at respective visited operating units.	Complied
		Logbook used to record any request from stakeholders (internal and external). Most of it mainly on monetary contribution/donation request from neighbouring villages and schools. Other request from government department/agency was by official letter and responded officially by letter to the respective department. Other related information and responses reported in stakeholder meeting which has been carried out by complex/zone on yearly basis. For Sg Tong POM complex @ north zone, the latest stakeholder meeting was carried out on 17/10/2023. Meeting minutes was made available for verification.	
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	TDM Plantation Sdn Bhd has developed SOP on Stakeholder Communication, TDMP/02, rev:01/2022 dated 1/10/2022. Flow chart @ Carta Aliran Pendendalian Isu Social (Stakeholder) (Aduan / Rungutan / Permohonan) / Social issues Flowchart (stakeholders) (Complaint/Application), incorporated in the SOP under appendix 1a flowchart form defining flow of the consultation and communication process. The information reported shall be rectify according to type of communication. E.g. Action within 28 days in the procedure. If further action request is involved Head Office, then the	Complied

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		approval and sh and external sta stakeholder mee	all be rectified wakeholders were eting as well as	equest to Head Office for further within 30 working day. All internal briefed on this procedure during muster / rollcall meeting by the ceach estates and mill		
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	nominated representation representat	esentative was operating unit. \ authority and o	details of stakeholders and their updated in the stakeholder list Verified the list which has included ther interested party – DOSH/DOE head etc.	Complied	
Criterio	on 1.2: The unit of certification commits to ethical conduct in all business op	perations and tran	sactions.			
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 -	Kerja; approved during site visit Jaya Estate late contractors (bus	Policy for ethical conduct is in place as per newly revised Polisi Etika Kerja; approved by new CEO on 22/2/2023. The policy also sighted during site visit at estate and mill's notice board. For example, at laya Estate latest briefing was carried out on 10/05/2023. For contractors (business operation and transaction), the policy has been briefed during contract signing session.			
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	muster, roll call stakeholders. In monitor complia overall ethical	Regular briefing on policies conducted to workers during morning muster, roll call and gatherings as mentioned above for internal stakeholders. Internal audit programme is used as a mechanism to monitor compliance and the implementation of the policy and overall ethical business practice. Latest internal audit by Sustainability as summarized below:			
		Estate/mill	Date of audit	Audit outcome/remarks		
		Jaya Estate	16/7/2023	9 NC raised (documentation) 9 NC raised (visual inspection)		
		Sg Tong POM	5/7/2023	8 NC raised (documentation)		

				5 NC raised (vi	sual inspection	
		Internal and check and balance on code of business conduct was carried by Sustainability Compliance and Integrity Department under TDM Berhad for Malaysian Anti-Corruption Commission (MACC) and Board of Director review on half-yearly basis.				
Principl	e 2: Operate legally and respect rights					
Criterio	n 2.1: There is compliance with all applicable local, national and ratified in	ternatio	onal laws an	d regulations.		
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	requi monit & R) licens	rements. Co cored by the personnel.	nai Tong CU continued to commpliance to each applicable law operating units and Sustainab The estates and mill had obtaints as required by the law. A ewed were;	and regulation is lity & Risk Unit (S ned and renewed	Complied
		Jaya Estate - Permit/license Validity				
		1	License Air	receiver, TG PMT 81733	13/05/24	
		2	MPOB licer	nse no 50149750-2000	31/03/24	
		3	JTK - Wag	es deduction	Eff 14/09/22	
		4	JTK - Peng	gajian Pekerja Asing ref 00651	Eff 14/09/22	
		5	KPDNKSH PT01	Permit storage diesel 8190 L	ref 27/01/24	
		6	APAD - Les	sen Pengendali ref LP 019790	14/12/26	

	Pelung Estate - Permit/license		
1	License Air receiver, TG PMT 5152	31/05/24	
2	MPOB license no 50282670-2000	31/03/24	
3	JTK - Wages Deduction - Elect/Water ref 800-2.2	Eff 28/04/19	
4	JTK - Penggajian Pekerja Asing ref 006510	Eff 14/09/22	
5	KPDNKSH Permit diesel 8190L ref T001143	23/01/24	
	Pinang Emas - Permit/license		
1	License Air receiver, TG PMT 4819	13/05/24	
2	MPOB license no 50260600-2000	29/02/24	
3	JTK - Wages deduction ref PP3/22/0051	Eff 27/11/05	
4	JTK - Penggajian Pekerja Asing ref 006510	Eff 14/09/22	
5	KPDNKSH Permit storage diesel 10000L ref 0127	06/10/24	
6	APAD - Lesen Pengendali ref LP 019790	14/09/26	
7	Metrology Corporation W/B A ref B1955508	Eff 30/3/23	
	Fikri Estate - Permit/license		
1	License Air receiver, TG PMT 3948	06/08/24	

	2	MPOB license no: 50337910-2000	31/08/24	
	3	MPOB license no: 62208500-2000	31/07/24	
	4	MPOB license no: 50337910-2000	31/07/24	
	5	KPDNKK - lesen diesel 8190 L ref T01093	06/11/24	
	6	JTK - Penggajian Pekerja Asing ref 006510	Eff 14/09/22	
	7	JTK - Potongan Upah ref 600.2.4 (14)	Eff 22/10/17	
		Sungai Tong Palm Oil Mill - Permit/license		
	1	MPOB license: 50004270-4000	31/03/24	
	2	Suruhanjaya Tenaga ref 00832	01/04/24	
	3	Water tube boiler PMD TG PMD 424	01/04/24	
	4	LSAT - Water Abstraction ref A00001	31/12/23	
	5	Back pressure receiver TG PMT 5357	01/04/24	
	6	Monorial Crane TG PMA 80224	05/09/24	
	7	Air Receiver Tank TG PMT 80366	01/04/24	
	8	Air Receiver Tank TG PMT 80367	01/04/24	
	9	Air Receiver Tank TG PMT 80368	01/04/24	
	10	Air Receiver Tank TG PMT 80369	01/04/24	
	11	Steam Drier TG PMT 7024	01/04/24	

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12	Air Compressor TG PMT 108128	05/09/24
13	Air Compressor TG PMT 784	05/09/24
14	DOE Jadual Pematuhan - ref 04090	30/06/24
15	KKM - Permit Sodium Hydroxide ref 015525	31/12/24
16	KPDNKSH Permit diesel 20000L ref T0001116	23/02/25
17	Metrology Corporation W/B A ref 001418	14/06/24
18	Metrology Corporation W/B B ref 05493	07/09/24

All documents were including the DOSH report were sighted and verified.

Factory and Machinery Act 1967 –

The following competency requirements were verified:

	License no	Ref no	Regn Date
1	Steam Engineer G 1	Ref 028/97	24/06/1997
2	Steam Engineer G 2	Ref 058/2018	05/02/2018
3	Steam Engineer G 2	Ref 104/2019	12/09/2019
4	Engine Driver G1	Ref EIS/01/10	31/12/2013
5	Engine Driver G2	Ref EIS/02/00107	16/08/2018
6	Engine Driver G2	Ref EIS/02/00121	26/12/2018



7	Engine Driver G2	Ref EIS/02/00155	04/11/2019
8	Engine Driver G2	Ref EIS02/00156	04/11/2019
9	Chargeman A4	Ref PJ 10500246	25/11/2005
10	Chargeman A4	Ref PJ 1113085	29/08/2013
11	Chargeman PW4	Ref PW 10501373	15/08/2005
12	AGT	3 Persons	10/11/2024
13	AESP	9 Persons	24/03/2024
14	CEPSWAM	Ref 02892	28/08/2019
15	CEPPOME	Ref 00307	18/04/2022
16	FFB Grabber	REF 152-2010	05/08/2010
17	Fire Safety Watch	2 Persons	29/08/2024

Air Monitoring

- a) Particulate Stack sampling was carried out twice annually.
- b) Noted that monitoring was conducted on (at 12.0%) CO2.

Boiler no	no Date Dust		EQA std
		concentration	
TG PMD 424	15/05/23	98.80 mg/m3	150 mg/m3
TG PMD 424	27/02/23	86.00 mg/m3	150 mg/m3

The stack sampling was carried out by Environmental Science (M) Sdn Bhd. The mill has installed ESP commissioned in Sept 2022.

2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations. - Minor compliance -	The CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them.	Complied
		 a) Each estate/mill had its own Legal and Other Requirements Register (LORR) and were being evaluated individually annually for compliance. The legal registers were updated by the person in-charge and approved by the respective Managers. b) The Sustainability And Risk Unit is responsible to track changes and the information was disseminated to all its plantations and Mill department. Among the applicable legal and included in the legal register are Pesticides Act 1974 and Regulations, 	
		- Environmental Quality Act 1974 and Regulations,	
		- Factories and Machinery Act 1967 and Regulations,	
		- Occupational Safety and Health Act 1994,	
		- Employment Act 1955,	
		- Labour Act 1955	
		- Children & Young Person (Employment) Act 2010	
		- Industrial Relations Act 1967,	
		- Children and Young Persons (Employment) Act 1966	
		- MPOB Regulations (Licensing) 2005.	
		- Min retirement age Act 2012	
		- Passport Act 1996	

		·	
		- Uniform Building By-Laws 1984	
		c) The latest legal register updated on 10/10/2023 as reviewed	
		by the Sustainability & Risk Unit are listed below	
		i. Fire Services (Fire Certificate) (Amendment) Regulations	
		2020 - Fire Services (Designated Premises) (Amendment)	
		Order 2020 - No more applicable	
		ii. Perintah Pencegahan dan Pengawalan Penyakit Berjangkit	
		(Pindaan Jadual Pertama) 2020	
		iii. Perintah Pencegahan dan Pengawalan Penyakit Berjangkit	
		(Pengistiharaan Kawasan Tempatan Jangkitan)	
		(Perlanjutan Kuat Kuasa) No 5 - 2020	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly	All the estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of	lied
	maintained, and there is no planting beyond these legal or authorised	boundary stones/markers/trenching at the 4 estates, during the	
	boundaries.	field inspection confirmed that they were clearly marked and	
	- Minor compliance -	maintained.	
		mantanea.	
		Estate Field Boundary Field Boundary	
		1 Jaya P 97A Smallholder P00/C3 Kg Jelapang	
		2 Jaya P06/D1 ECRL P05/B1 Kg Selamat	
		3 Fikri P00/A3 Kg Sendor P19A FELDA Belara	
		4 Fikri P21A Jaya Estate P20A FELDA Belara	
		5 Pelung P17A/A Smallholder PR21A Forest	
		Reserve Reserve	
		6 Pelung P97/A1 Kg Kerung	

			7	Pinang Emas	P96A2	KETENGAH	P96/A1	Kg Pdg Pulut						
			8	Pinang Emas	PR21A	Dataran Piramid	P19A/B 1	Gajah Mati Estate						
Criterio	on 2.2: All contractors providing operational services and supplying labour,	and	d F	resh Fruit	Bunch (Fl	FB) suppliers, c	omply with	legal requirements						
2.2.1	A list of contracted parties is maintained Minor compliance -							for verification at 3 stakeholder list.	Complied					
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.	at	t al	l visited o	perating u		pesanan k	erja/PPK" verified	Complied					
	Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers	Labour agency i) PT Primadaya Pratam Pandakarya, date of agreement 7/11/22 for Indonesian workers.												
	and labour contractors, is available Minor compliance -) (/11											
		0	the											
		FF	Sa FB aya											
		,	,	_	,			26/9/2023. Supply e signed: 1/10/23.						
					ources Sd 7/07/2019		l PK transp	oort from Sg Tong						
								ements have been all due diligence of						

		all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors were made available. For each month, contractors are required to provide all related pay documents (SOCSO, EPF and payslip) to demonstrate compliance with legal requirements.	
2.2.3	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. - Minor compliance -	Under para 4 of the signed contract and "perjanjjan pesanan kerja/PPK" stated the commitment not to employ children or young person, force labour or trafficked labour. This was explicitly available in all contract @ "perjanjjan pesanan kerja/PPK" sampled as reported under 2.2.2.	Complied
Criterio	n 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: 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 Critical (Major) compliance - 	Addressed in list of direct sourced FFB supply to Sungai Tong Palm Oil Mill. The Palm Oil Mill management managed to obtain the required information from the directly sourced FFB supplier. The information contains details such as: - Source of FFB - Address of plantation/dealer - MPOB license and Validity - Coordinate and size of plantation	Complied
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1. - Minor compliance -	Sighted the records of FFB supplier to the mill, form with the details regarding the information stated on 2.3.1 is available, however the information gathered from smallholders is not evident, since the volume of FFB/ha for suppliers is found to be not as industry standards (>25 mt FFB/ha). Thus, the Minor NC is escalated to Major NC	Non- compliance
Principl	e 3: Optimise productivity, efficiency, positive impacts and resilie	nce	
Criterio	n 3.1: There is an implemented management plan that aims to achieve lor	ng-term economic and financial viability.	

3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	Both the estates economic and fina 2028 were sighted cultivation, harvest RSPO compliance yield/ha, and total capital expenditurelated expenses. annual budget.	ancial vi- ed. The sting & e etc. Th cost of re mainl	ability. T budget evacuatio ne budge production y for buil	he annua covers n, welfare t also in on per mit dings, furi	I budgets activities e, capital cluded pr ton, per h niture and	for 2024 to for upkeep, expenditure, ojections on a and CAPEX others asset	Complied
		Jaya Estate	2024	2025	2026	2027	2028	
		Mature Ha	2770	2770	2683	2572	2446	
		Immature Ha	0.00	0.00	86.65	197.42	324.02	
		Total Ha	2770	2770	2770	2770	2770	
		FFB Tons	54200	55200	52250	46250	41700	
		Yld/Ha	19.56	19.93	19.47	17.98	17.05	
			•	•	•	1		
		Pinang Emas Estate	2024	2025	2026	2027	2028	
		Mature Ha	1662	1548	1283	1482	1890	
		Immature Ha	1052	1166	1430	1232	823	
		Total Ha	2714	2714	2714	2714	2714	
		FFB Tons	17500	18800	19800	23800	31000	
		Yld/Ha	10.53	12.14	15.43	16.05	16.40	



Pelung Estate	2024	2025	2026	2027	2028
lature Ha	788	749	775	802	841
mmature Ha	298	337	311	284	245
otal Ha	3,012. 35	3,012.3 5	3,012.3 5	3,012.3 5	3,012.3 5
FB Tons	7300	6800	7700	8500	10000
/ld/Ha	9.27	9.08	9.91	10.60	11.89
	I	I		I	1
Fikri Estate	2024	2025	2026	2027	2028
Mature Ha	1932	2027	2259	2189	2189
Immature Ha	700	605	373	443	443
Total Ha	2632	2632	2632	2632	2632
FFB Tons	30000	32000	33500	34100	35100
Yld/Ha	15.53	15.79	14.83	15.58	16.03
	l	1	l	<u>I</u>	<u> </u>
	x	х	Х	Х	х
RM/mt FFB	^				

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		a) FFB Processing & CPO/CPK production forecast b) Extraction Ratios – OER / KER, c) Cost of production - administration / labour overhead							
		- processing co	ost labour	, mainten	ance, con	sumables			
		- depreciation	and head	office cha	arges-				
		- EVIT runnir	ng accoun	ts					
		- CAPEX - cap	ital expen	diture.					
		Year	2024	2025	2026	2027	2028		
		FFB processed	182300	211650	228000	246350	264950		
		OER	19.51	20.50	20.50	21.00	21.00		
		KER	5.00	5.25	5.25	5.25	5.25		
		Administration	Х	Х	Х	Х	х		
		Processing cost	Х	Х	Х	Х	Х		
		Depreciation	Х	Х	Х	Х	х		
		H Q charges	Х	Х	Х	Х	х		
		RM/mt FFB	Х	Х	Х	Х	х		
		RM/mt CPO	Х	Х	Х	Х	Х		
.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	The long-range repon all the Estat							



	- Minor compliance -		ncorporated into their annual financial budget. The program ighted for the next 5 years in hectares was as follows:							
			Estate	2023	2024	2025	2026	2027		
			Jaya	86.65	110.77	0.00	242.87	324.82		
			Fikri	141.27	141.82	147.11	261.49	301.52		
			Pelung	0.00	0.00	185.44	59.09	0.00		
			Pg Emas	276.02	253.72	138.87	151.39	455.59		
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	on	ne Management Review (Marketing Operations Meeting) was a Group basis chaired by the Plantation Controller incorpor estates and mill in the Zone.							Complied
			Estate/M	ill D	ate	Attendee	Date	Attendee		
			1 Jaya Esta	ate 02	2/11/23	19	15/09/22	15		
			2 S Tong P	OM 02	2/11/23	19	15/09/22	15		



	T					Т	1	, , , , , , , , , , , , , , , , , , , 	
		3	3	Pelung Estate	02/11/23	19	15/09/22	15	
		4	1	Fikri Estate	02/11/23	19	15/09/22	15	
		5		Pg Emas Estate	02/11/23	19	15/09/22	15	
		The		igenda discusse	_		des the follo	owing;	
			 a) Results of internal audits b) Customer feedback c) Process performance and product conformity d) Status of preventive & corrective actions e) Changes that could affect the management system f) Recommendation for improvement g) Human Resources 						
	on 3.2: The unit of Certification regularly monitors and reviews their econon we demonstrable Continuous improvement in key operations.	nic, s	SO	cial and environ	mental per	formance a	and develop	os and impleme	nts action plans
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -			action plans for ng others havin				ocumented in	Complied
		a) b) c) d) e) f) g)		Optimizing the Reduction in us Environmental Waste reductio Pollution and g Impacts on con Integrated man SOP Compliance	e of pestici impacts n reenhouse nmunities, lagement o	des throug gas (GHG) workers, a	th implemer emissions nd smallhol	ders	

		The sampled operating units are implementing the action plans accordingly. Progress of the plans were also discussed in the management review meetings.	
		The mill similarly had plan for the operation among others as summarized below;	
		 a) Replacement of Boiler no 2 in 2023/2024 to improve boiler performance and use fibre as fuel and reduce shell consumption b) Pesticide usage - to concentrate on grass cutting for the compound upkeep c) Scrap iron collection - to expedite collection and maintained cleanliness of mill compound and for safety purposes 	
		CAPEX and continual improvement plan	
		i) Jaya Estate: 32 units of workers quarters (terrace 1x4), T2 (land house), refurbishment of rumah asuhan	
		ii) Sg Tong POM: 24 units of workers quarters (terrace 1x4), T3 (land and house)	
		iii) Pinang Emas Estate: 28 units workers quarters (terrace 1x4), T3 (land and house)	
		iv) Pelung Estate: infrastructure – bridges upgrade (40 feet), tar/asphalt road (300m)	
		v) Fikri Estate: 28 units workers quarters (terrace 1x2), Teduhan 2 & 3	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].	RSPO metric template version 2.1 is used for the reporting of TDM Sungai Tong certification unit's metrics (economic, social and environment). Data reporting period is January to December 2022	Complied

Complied



RSPO P&C Public Summary Report Revision 15 (Nov 2023)

PROCEDURAL NOTE:

The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.

Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.

- Minor Compliance -

for (social and environment metrics) and economic metrics from October 2022 – September 2023 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics. Based on verification through various documents such as land titles, JKKP report, employees register, computer software recording system, to, the data reported in the metrics template were found to be accurate.

Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.

- 3.3.1 **(C)** Standard Operating Procedures (SOPs) for the unit of certification are in place.
 - Critical (Major) compliance -

Standard Operating Procedure has been developed for the Mill and Estate for guidance in all operation conducted in the site.

Sample of Estate SOP were listed below:

- 1. Long Stalk Cutting procedure dated 16/08/2023
- 2. Manuring dated 01/04/2017
- 3. Environmental Aspect Impact identification procedure dated 01/10/2023
- 4. Trunk Injection dated 01/04/2017
- 5. Harvesting dated 01/04/2017
- 6. Accident procedure dated 01/04/2017

Sample of the mill SOP were listed below:

- 1. Digester and press procedure dated 01/05/2011
- 2. Supply Chain SOP IP & MB Module dated 01/01/2022
- 3. Oil room process dated 01/05/2011
- 4. Kernel plant dated 01/05/2011
- 5. Electrical system dated 01/05/2011
- 6. Emergency Response Plan dated 01/01/2018

...making excellence a habit."

		The management established the SOP for all the operations, which was communicated to workers during the morning muster call. Site visit to the estate verified that the activities sampled followed the SOP.	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	The mechanism to check the consistency of estate and mill implementation of their procedures includes Mill/Plantation Advisor Visit, Agronomist Visit and Internal Audit.	Complied
		Sighted the agronomist report dated 08/08/2023 with Ref No: TDMP/OD/01/11-Adv/LIY_2023 for Jaya Estate. Details of the reports include the FFB yield performance, rainfall, fertilizer application progress, field agronomic assessment, foliar analysis, and manuring recommendation.	
		Sighted the Sustainability Performance Report for Sungai Tong POM dated 14/08/2023 which was prepared by Ir Nurul Huda. The action plan is available for review.	
		Sighted the agronomist report dated 19/09/2023 with Ref No: TDMP/OD/07/60.11-Adv/LPE_2023a for Pinang Emas Estate. Details of the reports include the FFB yield performance, rainfall, fertilizer application progress, field agronomic assessment, foliar analysis, and manuring recommendation.	
		Procedure implementation checking at Pelung Estate was conducted through the Quality Control Team Operation Audit Unit, which conducted the audit to check the consistency of procedure implementation especially on the harvesting and FFB quality. Sample taken on the checking was conducted on 15/10/2023.	
		The agronomy and advisory department has conducted the visit to Fikri Estate and report were publish. The report dated 17/07/2023 with Ref No: TDMP/OD/07/60.11/Adv/LKF_2023a was verified.	

		Internal Audit from TDM Group was conducted on 18/07/2023, and reports are verified.	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	All operational units have consistently kept records of their monitoring activities, which are readily accessible for review. These records encompass various levels, ranging from field and mill supervisors to top-level executives and managers. The Plantation Controller (PC) is responsible for overseeing the estates' adherence to standard operating procedures, budgetary constraints, and productivity targets, among other factors. The performance of estates and mills is subject to monthly evaluation during meetings involving the PC, Chief Executive (CE), and Chief Executive Officer (CEO). A sample monitoring report is provided below for reference:	Complied
		Jaya Estate 1. Internal Audit report dated 16/07/2023	
		Pinang Emas Estate	
		1. Internal Audit Report dated 12/07/2023	
		Sungai Tong POM	
		1. Internal Audit Report dated 05/07/2023	
ĺ		Pelung Estate	
		1. Internal Audit Report dated 24/07/2023	
		Fikri Estate	
		1. Internal Audit Report dated 18/07/2023	
	on 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA ment and monitoring plan is implemented and regularly updated in ongoing a		l environmental
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected	The mill had established Environmental Impact Assessment (EIA) procedure and has been documented as per KPOM Environmental Aspect and Impact Identification (TDM/STPOM/01 rev. STPOM-01-	Complied



stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.

- Critical (Major) compliance -

2011). All significant impacts have been determined and mitigation plan was developed thereafter as per document STPOM Environmental Improvement Plan/Pollution Prevention Plan reviewed in Jan 2023. The environmental management plan are reviewed annually and documented in STPOM Environmental Aspect and Impact Identification (TDM/STPOM/01 rev. STPOM-01-2011). The latest document review being dated Jan 2023. There was NIL changes made.

Similarly for the estates the EAI and EIE was available for each activity reviewed dated reviewed Jan 2023. This aspect and impact include activities among others

- a) Construction / building maintenance
- b) power station / workshop activity
- c) Harvesting / spraying
- d) Fertilizer / Compost application
- e) Replanting

The Estates have established Environmental Management Plan 2023 with identification to the mitigation plan for negative impacts, time plan and the PIC stated therein. All sites and the reports were visited and sighted respectively by the auditors in presence of the Sustainability & Risk Unit, estates and mill personnel. There are no new plantings or operations within North Region. However, there were plans and impact assessments relating to

a) environmental impacts based on documents as following; Environmental Aspect Identification Evaluation Procedure, Register File no TDMP/5.2.EAI.



b) Environmental Impact Evaluation Procedure, Register File no EAI/203/1-04.

The EIA was reviewed on 01/11/2023. to include changes in 2022 for the ESP operations commissioned in Sept 2022. The EIA covers the following operations/activities among others;

- a) Reception / Sterilization / Clarification
- b) Nut/Kernel / CPO Product Storage /Despatch
- c) Raw & Treated Effluent
- d) Boiler House / Powerhouse
- e) Raw Water Treatment Plant
- f) Laboratory System / Store System / Cafeteria
- g) Bio Compost Plant / Workshop
- h) Construction Site

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.

The mill and estates has continuously implemented its annual programs that were established as part of its individual Pollution Prevention Plan. Managers and Assistant Managers of mill and estates were identified as the PIC. The programs relating to operations, environmental and social enhancement were planned by the management as per the budget at each estates and mill.

There are no new plantings or new operations within the Sungai Tong POM certification unit. Nevertheless, the management unit has carried out a reassessment Social Impact Assessment for TDM Plantation Sdn Bhd for Sg Tong Complex in June 2022. The assessment was done by external consultant under Green Orbis

		Environment Sdn Bhd from 12/6/22 to 15/6/22. The methodology of the assessment was through field interview with stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, officers from government authorities and internal workers. Issues raised by the stakeholders were incorporated into a management plan. The report includes both positive and negative impact and its recommendation.	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	The development of both Social and Environmental Management Plan activities involved discussion with the following parties among others;	Non- compliance
	- Minor Compliance -	 a) estate management, b) Workers and staff as the internal stakeholders c) External stakeholders compiled from issues raised during the meetings. d) Management meetings identifying issues in relation to social and environmental e) observation on sites and surrounding, f) The assessment in aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control. Social management plan was not comprehensively developed with participation of affected stakeholders. No records of consultation with China Communications Construction Company (M) Sdn Bhd (CCC) in the process of 2023' SIA management plan development for Fikri and Jaya Estate. CCC was also not invited in the latest North Zone stakeholder's meeting on 17/10/2023. Currently CCC is in progress of constructing ERCL project which affecting some 	

		stretch/area within Jaya and Fikri Estate. Thus, a minor NC was issued.	
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -	The Social/Environmental Action Plan available for each units were available having information i.e. issues, management plan, PIC and time frame. The input are gathered from the meeting minutes	Complied
		 a) Gender Committee, NUPW, b) Safety Meeting, EPMC c) Complaint & Request from internal & external stakeholders and muster briefing). the recent being made via feedback using forms distributed by the management. 	
		The activities involved discussion with the estate management, sighting the documentation, observation on sites and surrounding, and interview with stakeholders adjacent to the conversion areas.	
		The assessment covered the aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control. Feedback were obtained through questionnaire with stakeholders.	
		The social management plan was implemented, reviewed and updated on yearly basis in the participatory way by collected feedbacks during meeting with stakeholders. Seen the Social Management Plan 2023 in both mill and estate where the issues captured in the stakeholder meeting, Union/NUPW meeting, gender committee meeting were included.	

3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -	TDM Plantation Sdn Bhd has an SOP for recruitment of mill and estates. SOP named "Pengurusan Tenaga Kerja Tamu", TDMP/SOP-OD/01 dated 1 st March 2019. SOP for local workers (mill and estates) documented under "Prosedur Perlantikan Pekerja Ladang and Kilang", TDMP/SMP/3/01.01 dated 2 nd November 2016.	Complied
		The SOP specifies that recruitment, selection and hiring process involves vetting and interviews, and must be medically fit. Promotions are at the sole discretion of the Company. Retirement age is fixed at 60 for local and termination of employment can be given mutually subject to the terms of the employment contract and Employment Act 1955.	
		For foreign workers, or guest workers, the SOP for recruitment, hiring involves interview, selection based on age, qualification, and agricultural experience. Retirement and termination are as per Employment Act 1955 and employment contracts. There is no changes from previous audit and it remain unchanged.	
3.5.2	Employment procedures are implemented, and records are maintained Minor Compliance -	Based on the personal files sighted for local and foreign workers, the employment procedures are being implemented and all records such as job application forms, medical records and employment contract. Sample as per indicator 6.2.1.	Complied
Criterio	on 3.6: An occupational health and safety (H&S) plan is documented, effective	vely communicated and implemented.	
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	The mill and estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following: - Change in work process	Non- compliance

 ,	_	
- Revision/changes in legislat	ive requirement	
- Occurrence of accidents		
Appropriate risk control me	easures were determined and	
implemented for the respective	activities and operation.	
	d NRA was last conducted at the	
sampled management unit as fo	ollows:	
Jaya Estate –		
HIRARC	Date: 05/10/2023	
Chemical Hazard Risk	Date: 17/09/2019	
Assessment	Report Reference No:	
	HQ/12/ASS/00/306-2019/0021	
	Assessor Reg No: JKKP	
	HQ/10/ASS/00/306	
Noise Risk Assessment	Date: 20/10/2020,	
	Report Ref No: R-NE-20-TDM-	
	LJY-17	
	Assessor Reg No:	
	HQ/06/PEB/00/69	
Sungai Tong Palm Oil Mill		
	D. J. 22/05/2022	
HIRARC	Date: 23/05/2023	

Chemical Hazard Risk Assessment	Date: 05/08/2019 Report Reference No: HQ/08/ASS/00/259-2019/005 Assessor Reg No: JKKP HQ/08/ASS/00/259
Noise Risk Assessment	Date: 16/03/2023 Report Ref No: Assessor Reg No: HQ/09/PEB/00/97
LEV Inspection, Testing and Examination	Date: 06/04/2023 HT DOSH registration: HQ/21/JHII/00/00048
Pinang Emas Estate –	
HIRARC	Date: 30/07/2023
Chemical Hazard Risk Assessment	Date: 18/06/2019 Report Reference No: JKKP HQ/10/ASS/00/8 2019/145 Assessor Reg No: JKKP HQ/10/ASS/00/8
Noise Risk Assessment	Date: 12/09/2020, Report Ref No: R-NE-20- TDMLPE-12

	Assessor Reg No: HQ/06/PEB/00/69
Pelung Estate –	
HIRARC	Date: 05/07/2023
Chemical Hazard Risk Assessment	Date: 25/11/2019 Report Reference No: JKKP HQ/08/ASS/00/259-2019/009
	Assessor Reg No: JKKP HQ/08/ASS/00/259
Noise Risk Assessment	Date: 20/12/2020 Report Ref No: R-NE-20- TDMLP-20
	Assessor Reg No: HQ/06/PEB/00/69
Fikri Estate –	
HIRARC	Date: 30/05/2023
nemical Hazard Risk sessment	Date: 23/06/2020 Report Reference No: JKKP HQ/10/ASS/00/8 2020/047 Assessor Reg No: JKKP HQ/10/ASS/00/8
e Risk Assessment	Date: 29/09/2021

		Report Ref No: HQ/18/PEB/00/00020- 2021/006) Assessor Reg No: HQ/18/PEB/00/00020	
		During verification at each visited estate, it was observed that the Chemical Hazard Risk Assessment (CHRA) is available. However, upon cross-checking with the Chemical Register at each estate and inspecting the chemical store during the visitation, it was noted that there are chemicals and fertilizers used and listed in the Chemical Register were not assessed in the CHRA. Thus, the Major NC is raised.	
		Normative Reference: Regulation 10, Occupational Safety And Health Act 1994 [Act 514] Occupational Safety And Health (Use And Standards Of Exposure Of Chemicals Hazardous To Health) Regulations 2000	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -	TDM has consistently upheld the approved Health and Safety Policy, dated 01/01/2022, which is prominently displayed on notice boards in both English and Bahasa Malaysia. The policy has been signed by the Chief Executive Officer. Additionally, a Safety & Health Management Plan was prepared and made available for the year 2023.	Complied
		In addition to regular daily supervision, various methods have been employed to assess the effectiveness of the Health and Safety plan. These methods include SHO Workplace Inspections, internal audits, safety committee meetings, medical surveillance, and audiometric tests. Records documenting these monitoring	



activities have been provided for verification by selected management units.

Jaya Estate

Health surveillance was conducted every month for all workers work with manuring, spraying, diesel handler, and workshop. Latest health surveillance was conducted on 10/10/2023. The management has conducted the pregnancy and health checking for female workers that are directly involved in handling chemical. The audiometric testing was conducted on 22 and 23/10/2023 for 9 workers which stated 7 having normal audiometric with two workers having High Frequency Hearing loss and 1 workers having hearing impairment. There is no need to repeat the test within three months. Annual audiometric to continue.

Sungai Tong Palm Oil Mill

Medical surveillance was conducted on 30/07/2023 for 33 workers which are related to the operators works in the lab, maintenance, and chemical operators. All workers were declared fit, with no MRP.

Audiometric test was conducted on 6-7/06/2023 for 108 workers. Result shows that 62 workers are having normal audiometric, and 7 workers having temporary STS that needed to be retest within three months. Retest was conducted on 20/07/2023 found that 4 of the workers having permanent STS. The management has submitted the JKKP7 to DOSH dated 29/10/2023 after confirmation made by OHD dated 27/10/2023.

Pinang Emas Estate

Medical surveillance was conducted as per of the recommendation of CHRA, which the estate has sent the workers to conduct the test on 18/03/2023. All workers were declared fit.

The audiometric testing was conducted on 06/09/2023 for 30 workers which stated 15 workers having normal audiometric with



15 workers having High Frequency Hearing loss and 8 workers having hearing impairment. 5 workers were having abnormal audiogram and 1 worker having STS were referred to OHD on 12/09/2023. Result shows one workers having induced hearing loss, which the management has sent the JKKP7 on 09/10/2023, and one worker need to be refer to ENT Specialist.

Pelung Estate

Medical surveillance was conducted as per of the recommendation of CHRA, which the estate has sent the workers to conduct the test on 12/09/2023. All workers were declared fit.

The audiometric testing was conducted on 13/09/2023 for 15 workers which 11 workers conducting the normal audiometric and 4 workers conducting baseline audiometric. Report stated 8 workers having normal audiometric with 7 workers having High Frequency Hearing loss and 1 worker having hearing impairment and 1 worker having STS, which need to reconduct audiometric test within 3 months. The management has plan to conduct the test in November 2023.

Fikri Estate

Medical surveillance was conducted as per of the recommendation of CHRA, which the estate has sent the workers to conduct the test on 23/08/2023, 29/08/2023, 03/09/2023 and 05/09/2023. All 25 workers tested were declared fit.

The audiometric testing was conducted on 23/08/2023 – 05/09/2023 for 24 workers which 22 workers conducting the normal audiometric and 2 workers conducting baseline audiometric. Report stated 8 workers having normal audiometric with 8 workers having High Frequency Hearing loss and 6 worker having hearing impairment and 3 worker having STS, which need to reconduct audiometric test within 3 months. The management

Critoria	on 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract w	conducted the retest on 08/10/2023 and 17/10/2023. 1 worker was confirmed on having Left Ear Noise Induces Hearing Loss, JKKP7 were submitted to DOSH by the management.	
3.7.1	(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. - Critical (Major) compliance -	An annual training program has been created and documented within the Occupational Safety and Health (OSH) Plan. This program includes a comprehensive Training Matrix and Training Schedule that addresses all aspects of the RSPO elements. The training program clearly outlines the specific groups of employees to be trained in various subjects, ensuring that the program caters to the requirements of all the estates and mills	Complied
3.7.2	Records of training are maintained Minor Compliance -	Records of training were maintained by the mill and estates and made available for verification. Among the records verified are as follows: Jaya Estate 2. Manuring SOP Training – 24/09/2023 3. Blower SOP Training – 21/03/2023 4. Accident Reporting Training – 13/08/2023 5. Contractor safety training – 11/07/2023 6. Trunk Injection Training – 03/10/2023 7. Harvesting, PPE, Workplace Inspection Training-23/05/2023 Sungai Tong Palm Oil Mill 1. Policy briefing, PPE Matrix and PPE Training – 28/01/2023 2. Hearing management training – 05/04/2023 3. First Aid Training – 12/06/2023 4. Confined Space training – 27/07/2023	Complied

5. Fire Drill and Emergency Response Team training – 13/09/2023	
6. Supply Chain and traceability – 27/09/2023	
B. F. F.	
<u>Pinang Emas Estate</u>	
1. First Aid training – 10/10/2023	
2. Personal hearing protection Training – 19/06/2023	
3. Tractor driving and handling Training – 19/06/2023	
4. FFB netting installation training – 29/05/2023	
5. Herbicide Spraying and calibration (Chemical handling) Training – 23/05/2023	
6. Fire Drill Training- 22/03/2023	
<u>Pelung Estate</u>	
1. Harvesting SOP training – 21/02/2023	
2. Pest control procedure training – 15/03/2023	
3. Work at height training – 21/05/2023	
4. Spraying SOP training – 10/07/2023	
5. Chemical handling training – 23/08/2023	
6. First Aid training – 11/10/2023	
7. Fire drill, emergency response team, and fire extinguisher training – 24/10/2023.	
<u>Fikri Estate</u>	
1. Chemical handling training – 25/10/2023	
2. PPE training on chemical and hearing protection – 11/10/2023	



		 Machinery inspection and maintenance training – 09/10/2023 PPE training in manuring – 05/10/2023 First Aid training – 04/09/2023 Firefighting training – 30/08/2023 	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor Compliance -	Training on supply chain was recently held by the mill on 27/09/23 It was attended by personnel from various department such as administration, weighbridge, laboratory, and security. Record of training and attendance was sighted and verification	Complied
Criterio	on 3.8: Supply chain requirement for mills		
(note: A	Il supply chain requirements are considered as Critical (C) . However, it will n	not contribute to suspension if there is more than 5 non-compliance w	vithin a principle)
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. 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.	NA as the mill opted for Mass Balance Module	Not Applicable
3.8.2	Mass Balance Module 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	Sungai Tong POM received and processed both RSPO certified and uncertified FFB from plantations/estates, outgrowers and FFB Traders and claim only the volume of oil palm products produced from processing of the certified FFB as MB certified.	Complied

	only the volume of oil palm products produced from processing of the certified FFB as MB.		
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. The actual tonnage produced from last audit date is reported in the summary in Table 7 and Table 10.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows: - Members ID: RSPO_PO1000001113 - Type Of Business: Oil Mill - RSPO Membership No: 1-0095-11-000-00 Details of transaction can be seen in Table 11A of this report.	Complied
3.8.5	Documented procedures 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: 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	Documented Procedures were made available for verification and the requirements have been adhered to as follows: a) RSPO Supply Chain Standard Operating Procedure (Identity Preserved & Mass Balance), doc. No. TDM/TRCBLT/04, rev. SCCS-02/2022 b) Complete and up to date records and reports in relation to RSPO SCCS were maintained and available for verification. Among the records available were Mass Balance Sheet, Internal Audit Reports, and SCCS Training records to name a few	Complied

	compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.	 c) TDM Plantation Sdn Bhd have identified and appointed the Mill Manager as the PIC for RSPO Supply Chain Certification Standard requirements as stated in the appointment letter dated 07/07/2019, undersigned by Pengurus Pentadbiran Perladangan TDM Plantations Sdn Bhd. (Doc Reference Number: TDMP/OD/SUST/SCCS) d) Procedures for receiving and processing certified and noncertified FFBs were addressed in the Standard Operating Procedure for RSPO Supply Chain (Identity Preserved and Mass Balance Module), doc. No. TDM/TRCBLT/04, rev. SCCS-02/2022 	
3.8.6	 i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports. 	The procedure to hold annual internal audit is addressed in the RSPO Supply Chain Standard Operating Procedure (Identity Preserved & Mass Balance), doc. No. TDM/TRCBLT/04, rev. SCCS02/2022. The last internal audit was conducted on 05/07/2023 by the Head Sustainability & Risk Unit. Based on the internal audit report and checklist, the elements of RSPO supply chain were adequately covered including the RSPO Market Communications and Claims elements. There was no non-conformity report raised from the internal audit. Should there be any non-conformity, corrective action shall be established to rectify the lapse found. The status of the nonconformity are also be discussed in the management review meeting	Complied
3.8.7	Purchasing and Goods In i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.	Sungai Tong Palm Oil Mill consistently maintains daily records of all received Fresh Fruit Bunches (FFB), whether they are certified or uncertified. These records are comprehensively documented in the daily processing records and encompass vital information such as the identity of FFB suppliers, their respective weights, and	Complied

iii) The mill shall have a mashaniam in place for handling your conferming	details regarding the transportation valides. Additionally, the call
iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.	details regarding the transportation vehicles. Additionally, the mill keeps a well-organized record of received FFB, including Delivery
TTD dila/of docaments.	Notes and records of the Weighbridge operators, ensuring
	transparency and accuracy in their operations.
	Sample of FFB delivery records:
	Incoming FFB
	TDM Certified Supply Base
	- Company: TDM Plantation Sdn Bhd
	- Estate: Fikri Estate
	- Certified No: RSPO595564
	- Date: 25/06/2023
	- Ticket Number: STP23361182
	- Vehicle Number: TBM2620
	- Field / Block: PM19A
	- FFB Weight: 4.18 Mt
	TDM Certified Supply Base
	- Company: TDM Plantation Sdn Bhd
	- Estate: Jaya Estate
	- Certified No: RSPO595564
	- Date: 13/06/2023
	- Ticket Number: STP23360641
	- Vehicle Number: TBX8236
	- Field / Block: PM05A2
	- FFB Weight: 8.07 Mt
	Non-Certified 3 rd Party FFB
	- Company: Kim Ma Oil Palm Sdn Bhd

		 Estate: FFB Dealer Date: 01/06/2023 Ticket Number: STP23360137 Vehicle Number: VJQ2869 FFB Weight: 8.88 Mt Mechanism to handle non-conforming FFB and documents has been detailed up in the Procedure RSPO Supply Chain Section 6 Receiving FFB At The Mill. 	
The RS info doo pal	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;	Sungai Tong POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below: CPO - MB a) The name and address of the buyer; XXXXXXX b) The name and address of the seller; TDM Plantation Sdn Bhd c) The loading or shipment / delivery date; 03/07/2023 d) The date on which the documents were issued; 03/07/2023 e) RSPO Certificate Number: RSPO 595564 f) A description of the product: CPO MB g) The quantity of the products delivered; 39.86 Mt h) Any related transport documentation; CDQ 6569 i) Weighbridge Ticket number: STS23065918 PK - MB a) The name and address of the buyer; XXXXXXXX b) The name and address of the seller; TDM Plantation Sdn Bhd c) The loading or shipment / delivery date; 02/11/2023	Complied

		d) The date on which the documents were issued; 02/11/2023 e) RSPO Certificate Number: RSPO 595564 f) A description of the product: PK MB g) The quantity of the products delivered; 42.18 Mt h) Any related transport documentation; TBB 4499 i) Weighbridge Ticket number: STS23066663	
3.8.9	 Outsourcing Activities i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective 	TDM Plantation Sdn. Bhd. has established Standard Operating Procedure for RSPO Supply Chain (Identity Preserved and Mass Balance Module). Refer Document Edition: TDM/TRCBLT/04; Revision: SCCS – 02/2022; Document Date: 01/01/2022 under section 11: Outsourced contractors. i. Stated in the SOP, CPO mill cannot outsource processing activities like refining or crushing. Outsourcing activities for Sungai Tong POM was for CPO and PK transportation. ii. Sighted the contract agreement between TDM Plantation Sdn. Bhd and contractor; a) Sungai Tong POM has legal ownership of all input material to be included in the outsourced process. Refer listing of FFB Supplier Certified and Non-Certified. The contract agreement and details like MPOB licence were kept in the file. b) Refer Contract Agreement between TDM Plantation Sdn Bhd and MNAN Resources Sdn Bhd (CPO and PK Transporter) dated 31/10/2022; Contract Renewal; Reference Number TDMP/OD/09/01/32; Dated 02/12/2022.	ed

	operations, systems, and all information, when this is announced in advance.	c) The mill trades CSPO and CSPK with its buyers among refineries and/or oleo-chemical plants. Based on agreements, transporter has no ownership of transported products and owned by buyer. The contract agreements specified that all transporters are required to fulfil and comply with applicable legal requirements as well as TDM own requirements which include the RSPO. Refer Additional term (12).	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Names and contact details of transporters used for the physical handling of RSPO certified oil palm products were recorded and registered in the mill supplier database system. Details as follows. MNAN Resources Sdn Bhd Lot PT1805 Kampung Selamat Jalan Pelabuhan Kuantan 26080 Kuantan Prifaria Sdn Bhd Lot 2529K, Jalan Permint Jaya Kawasan Perindustrian Chendering 21080 Kuala Terengganu.	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.	Names and contact details of any new transporter used for the physical handling of RSPO certified oil palm products to be informed by mill supply chain PIC upon availability and changes on occurrence. This being emphasized during the training on SCCs dated 05/07/2023.	Complied



		T T
3.8.12	 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: 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. 	Accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements available for verification. 1. Sg Tong POM has kept the records such as SOP, training, dispatch note as per RSPO SCC Standard February 2020 requirement. Sampled seen as per 5.4.1, 5.6.1. 2. The records are kept for 5 years as per own established SOP, TDM/TRCBLT/04, SCCS-01/2020 dated 01/12/2020. 3. Not applicable. 4. Based on verification of MB accounting which the mill opted for real time basis recording, it was found that the certified CPO was always delivered from positive stock. There was no short sale recorded within the last review period. Closing stock for October 2023; CPO: 1158.07 MT, PK: 70.00 MT
3.8.13	Extraction Rate 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.	The oil extraction rate (OER) and the kernel extraction rate (KER) estimate is based on past experience and extraction rate potential (budget) for the next financial year. For the last reporting period, OER and KER reported at 19.46% and 4.74%. (October 2023)



3.8.14	Extraction rates shall be updated periodically to ensure accuracy against	Extraction rate recorded at (OER) 19.46 % and (KER) 4.74% for	Complied
	actual performance or industry average if appropriate.	the last review period from October 2022 to October 2023.	
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.	Not applicable. Sungai Tong Palm Oil Mill is under mass balance module	Not Applicable
3.8.16	 Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform. 	Sg Tong POM take legal ownership and physically handle RSPO Certified Sustainable oil palm products (CPO and PK) and registered all transaction in the RSPO IT platform. RSPO ID: RSPO_PO1000001113, license valid until 06/02/2024 Declaration time to do shipping announcement is within three-month period after shipment or within the duration agreed by mill's respective customers/buyers as defined in the SOP under clause 8.4. Details of shipping announcement can be found under appendix D of the report.	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
Genera	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.	TDM Sungai Tong POM does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records. The corporate communication is managed at TDM Plantation at Head Office level.	Complied



4.2	In corporate communications, a member is allowed to: A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of 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	TDM Sungai Tong POM does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records. The corporate communication is managed at TDM Plantation at Head Office level.	Complied
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	TDM Sungai Tong POM does not use any RSPO trademark or logo in any general corporate communication.	Complied
4.4	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.	TDM Sungai Tong POM does not use any RSPO trademark or logo in any general corporate communication or statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products. If necessary or required will be handled at TDM Plantation Head Office level.	Complied
4.5	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: • "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."	TDM Plantation Head Office level will handle communications or statements if any in relation to highlight TDM RSPO certification status and product-related claims.	Complied



4.6	RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following: 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. B. Claim statements are limited to the following examples: i. "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)." 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. 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".	Product related claims if any are handled at TDM Plantation Head Office level. a) There are no evidence of RSPO corporate logo used by TDM Sungai Tong POM as verified through documentations and websites. b) TDM has yet to make any claim statement to date as verified through documentations and websites. c) TDM Plantation Head Office level will decide on any decision and commitment to sourcing RSPO certified volumes.	Complied
Product	t-specific communications		
5.1 Gen	peral		
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.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain player or buyer. Verified the weighbridge tickets to buyer where claim of CSPO (Mass Balance) was stamped on the tickets. There were no off-product claim received by TDM Sungai Tong POM as to date.	Complied
5.1.2	Product-specific communications are voluntary.	Product specific communications if any are handled at TDM Plantation Head Office level.	Complied
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.	TDM Plantation do not use RSPO label for product specific communications. If any or necessary, this will be handled at TDM Plantation Head Office level.	Complied

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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 • 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. 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	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.	TDM Plantation do not use other trademark or label to highlight the presence of RSPO certified sustainable palm oil products. If any or necessary this will be handled at TDM Plantation Head Office level.	Complied
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	5.1.5	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 • 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	deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and	Not Applicable
34PF./ 5.14	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	deliveries made in bulk via tanker for CPO and cargo lorry for PK. Delivery documents specified only RSPO module i.e. CPO MB and	Not Applicable

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.	TDM Plantation Sdn Bhd does not use an off pack claim. This is evidence in sighting documents i.e., shipping documents, advertisements, flyer, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports	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.	TDM Plantation Sdn Bhd does not use an off pack claim. This is evidence in sighting documents i.e., shipping documents, advertisements, flyer, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports	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: • 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.	Not distributor or wholesaler. Therefore, it 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 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	This is not applicable as Sungai Tong Palm Oil Mill under TDM Plantation Sdn Bhd is on finished products.	Not Applicable



	purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.		
5.3.2	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:	This is not applicable as Sungai Tong Palm Oil Mill under TDM Plantation Sdn Bhd is on finished products.	Not Applicable
	A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:		
	 RSPO IP/SG CERTIFIED* Contains RSPO IP/SG palm oil* Contains RSPO certified palm oil (IP/SG)* *Add RSPO TM Licence Number below or next to the claim. 		
	B) or Mass Balance (MB) Certified Products: RSPO MIXED* Contributes to the production of RSPO certified palm oil* Contains RSPO certified palm oil (MB)*	This is not applicable as Sungai Tong Palm Oil Mill under TDM Plantation Sdn Bhd is on finished products	Not Applicable
	*Add RSPO TM Licence Number below or next to the claim.		
	C) For Partially Certified Products: RSPO 50% MIXED* Contains at least 50% RSPO certified palm oil*	This is not applicable as Sungai Tong Palm Oil Mill under TDM Plantation Sdn Bhd is on finished products	Not Applicable
	*Add RSPO TM Licence Number below or next to the claim.		
	 D) For Products covered with Book and Claim (B&C): RSPO CREDITS* Supports the production of RSPO certified palm oil* Contains palm oil covered by the purchase of RSPO Credits* *Add RSPO TM Licence Number below or next to the claim. 	This is not applicable as Sungai Tong Palm Oil Mill under TDM Plantation Sdn Bhd is on finished products	Not Applicable
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	This is not applicable as Sungai Tong Palm Oil Mill under TDM Plantation Sdn Bhd is on finished products	Not Applicable

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5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	This is not applicable as Sungai Tong Palm Oil Mill under TDM Plantation Sdn Bhd is on finished products	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.	This is not applicable as Sungai Tong Palm Oil Mill under TDM Plantation Sdn Bhd is on finished products	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 Myron portal.	This is not applicable as Sungai Tong Palm Oil Mill under TDM Plantation Sdn Bhd is on finished products	Not Applicable
MODU	LE B – MASS BALANCE SPECIFIC RULES		
Mass E	Balance palm oil content		
	95% of the palm oil content must be RSPO MB-certified.	Oil palm content for CPO and PK is 100% RSPO MB certified. There was no mixture of non-certified oil palm content when MB claim is made.	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.	Sungai Tong POM only applies MB model and the conventional CPO are downgraded from MB whenever demanded.	Complied
Messa	ging		
	 Messaging ALLOWED in storytelling in product-specific communications includes: [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. 	No RSPO label and storytelling in product-related communications used as CPO and PK is semi-finished product.	Complied



Product	t-Specific Communications Labelling	Product-Specific Communications Labelling		
	Members are allowed to use the RSPO Label in one of the following ways: • 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".	in any general corporate communication or statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products. If necessary or required will be handled at TDM Plantation Head Office level.	Complied	
Principl	e 4: Respect community and human rights and deliver benefits			
Criterio	n 4.1: The unit of Certification respects human rights, which includes respe	ecting the rights of Human Rights Defenders.		
4.1.1	(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. - Critical (Major) compliance -	Sg Tong POM management unit subscribed to Human Rights Policy dated 1 st January 2022 signed by new CEO. This Policy is documented and affirms the Company's commitment to support the principle of Universal Declaration of Human Rights and ILO Core Convention on Labour Standards as to identify, evaluate and manage the social impact on human rights. Policy was communicated and briefed to all workers in order for them to understand their responsibility in respect of human rights. For example, the latest briefing was caried out at Jaya Estate on 10/05/2023.	Complied	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	Based on documentation review, observations and stakeholder interviews, there is no evidence that Sg Tong POM certification unit had instigated violence or used any form of harassment in its operations.	Complied	

Criterio	on 4.2: There is a mutually agreed and documented system for dealing with	complaints and grievances, which is implemented and accepted by all	affected parties
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	TDM Plantation Sdn Bhd has developed SOP on Stakeholder Communication, TDMP/02, rev:01/2022 dated 1/10/2022. Flow chart @ Carta Aliran Pendendalian Isu Social (Stakeholder) (Aduan / Rungutan / Permohonan) / Social issues Flowchart (stakeholders) (Complaint/Application), incorporated in the SOP under appendix 1. The information / issue reported shall be rectify according to type of communication. E.g. Prosedur Komunikasi Dengan Pihak Kilang / Ladang, within 28 days & Prosedur Aduan / Rungutan; within 28 working days which include discussion with relevant parties, manager and top management. If further action request is involved Head Office, then the management will submit the request to Head Office for further approval and shall be rectified within 30 working day.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	To ensure understanding of all affected and/or illiterate parties, the information is provided in local language and briefed to workers during muster and stakeholder meeting. This was confirmed during onsite interview session with both internal and external stakeholders.	Complied
4.2.3	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. - Minor compliance -	During this audit, there is no evidence of any grievance filed by stakeholders. However, in accordance with the grievance procedure reviewed, the complainants are to be informed of the status of the complaints at various stages of the dispute resolution process; e.g. within 14 days of receipt of complaint received by the estate management and to be resolved within 30 days. Outcome of resolution process is available and communicated to relevant stakeholders.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to	Conflict resolution mechanism is defined in the flowchart named Communication Procedure – TDMP/02, rev:01/2022 dated	Complied



	choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	1/10/2022. Flow chart @ Carta Aliran Pendendalian Isu Social (Stakeholder) (Aduan / Rungutan / Permohonan) / Social issues Flowchart (stakeholders) (Complaint/Application), incorporated in the SOP under appendix 1. Mediation included in consultation process for resolution which to allow party to be represented as in this case, union @ NUPW or other personnel appointed/chosen by the complainant. As for external party, they can choose any person to act as observers, as well as the option of a third-party mediator.
Criterio	on 4.3: The unit of Certification contributes to local sustainable developmen	t 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 -	Mill and estates' management has made contribution to the local communities and workers. The management has provided recreational facilities such as football field, community hall and mosque to the local communities. Besides, the management has made donation to schools for the events upon request by the stakeholders. Interviewed with the representative from school confirmed that the management has provided assistance (donation) and workforce to help for any repairs and upkeeping. All the above issues were captured during consultation with communities through stakeholder meetings and during engagement process.
Criterio	on 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	(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. - Critical (Major) compliance -	Land titles are available to demonstrate evidence of land leases. The land titles contain information on lessee, hectarage, terms and conditions of lease period and grant numbers. The following land titles were sampled: Jaya Estate
	Chacar (Hajor) compliance	No. Land title details Land use type Tenure

1 Pinang	District: Setiu, Mukim: Hulu Nerus, grant no. HK 6001, lot no. 6558 Total hectare: 3,135.72 ha	No specific term	Freehold
No.	Land title details	Land use type	Tenure
1	District: Dungun, Mukim: Besul, HS(D)no. 73, no. PT 141, total area: 624.8352 ha Hectarage: 3,807.06 ha	Cultivation of oil palm	Freehold
Pelung	<u>Estate</u>		
No.	Land title details	Land use type	Tenure
1	District: Setiu, Mukim: Hulu Nerus, HK no. 12150, lot no. 51902, total area: 3002 ha Total of 6 land titles hectare: 3,012.42 ha	Cultivation of oil palm	Freehold
Fikri Es	<u>state</u>		
No.	Land title details	Land use type	Tenure

		1 District: Kuala Terengganu, Mukim: Belara, HS(D) 561, PT 642K, total area: 635.8752 ha Total of 13 land titles hectare: 3,611.02 ha
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent. Therefore, there was no documents evidence of any negotiated agreements detailing FPIC process.
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.
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 -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.
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	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.



	status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -			
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Complied	
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Complied	
4.4.5	(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 -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Complied	
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Complied	
	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 the 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 -	Sungai Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area. Documented procedure is in place as per "Flowchart and Procedures On Handling Land Disputes," Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc.	Complied	

		No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017; that states the process of resolve the land dispute issues. Objectives of the procedure is to ensure the land dispute is resolved in timely manner. Types of disputes are such as disputes over land boundaries, conflicts with landowners and land ownerships. Verification process of conflict will be carried out and affected stakeholders need to be informed. Compensation and negotiation process will be carried out as per the mutual agreement of both parties.	
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	Sungai Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.	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 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. - Minor compliance -	Sg Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.	Complied
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	Sg Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.	Complied



	- Minor compliance -		
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	Sg Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.	Complied
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 -	Sg Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.	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 -	Sg Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation Critical (Major) compliance -	No acquired new lands in the areas inhibited by communities within Sg Tong POM certification unit.	Complied
	on 4.6: Any negotiations Concerning compensation for loss of legal, customs, local communities and other stakeholders to express their views through t		bles indigenous
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 -	Documented procedure is in place as per "Flowchart and Procedures On Handling Land Disputes," Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017; that states the process of resolve the land dispute issues. Objectives of the procedure is to ensure the land dispute is resolved in timely	Complied

		manner. Types of disputes are such as disputes over land boundaries, conflicts with landowners and land ownerships. Verification process of conflict will be carried out and affected stakeholders need to be informed. Compensation and negotiation process will be carried out as per the mutual agreement of both parties. This process disseminated to the external stakeholders through stakeholder meeting.	
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	The process is explained under "Flowchart and Procedures On Handling Land Disputes," Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	No scheme smallholdings within Sg Tong POM certification unit. Thus, this indicator is not applicable.	Not Applicable
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	At the point of audit, there was no process and outcomes of any negotiated agreements, compensation and payments reported.	Complied
	n 4.7: Where it can be demonstrated that local peoples have legal, cushment of rights, subject to their FPIC and negotiated agreements.	stomary or user rights, they are compensated for any agreed land	acquisitions and
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place Critical (Major) compliance -	There is a guidance procedure for "Flowchart and Procedures On Handling Land Disputes," Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and	The process is explained under "Flowchart and Procedures On Handling Land Disputes," Version 1, year 2013, Issue 1, date:	Complied

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	implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017	
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	No customary land authorized by customary landowners through FPIC process within Sg Tong POM certification unit. Thus, this indicator is not applicable	Not Applicable
Criterio rights.	on 4.8: The right to use the land is demonstrated and is not legitimately co	l ntested by local people who can demonstrate that they have legal, cu	stomary, or user
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	No customary land authorized by customary landowners through FPIC process within Sg Tong POM certification unit. Thus, this indicator is not applicable	Not Applicable
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	No customary land authorized by customary landowners through FPIC process within Sg Tong POM certification unit. Thus, this indicator is not applicable	Not Applicable
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	No customary land authorized by customary landowners through FPIC process within Sg Tong POM certification unit. Thus, this indicator is not applicable	Not Applicable

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4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	No customary land authorized by customary landowners through FPIC process within Sg Tong POM certification unit. Thus, this indicator is not applicable	Not Applicable
Princip	le 5: Support smallholder inclusion		
Criterio	on 5.1: The unit of certification deals fairly and transparently with all smallh	olders (Independent and Scheme) and other local businesses.	
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and previous FFB prices were displayed at the weighbridge office for the suppliers to refer. The calculation of price can be provided to the suppliers upon request. As for the collection centres, pricing is depending on contract agreements. The explanation about the pricing is provided upon signing the agreement. Any enquiry about the price is welcome and can be made through phone call or physical meeting.	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 -	The explanation about FFB pricing was made normally through stakeholders meeting or upon request. Minutes of meeting were made available for verification on the stakeholder meeting conducted on 17/10/2023	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	FFB pricing is based on the MPOB Monthly Average Price for CPO and PK and the OER and KER awarded by Sungai Tong POM. This can be evident through verification of the Self Billed Invoice to the FFB Suppliers. There has been no grievance reported with regards to unfair pricing since the last assessment.	Complied
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and	certification unit as they only receive FFB from outgrowers and FFB Traders.	Complied

	repayments through FFB price reductions for replanting and or other support mechanisms where applicable Critical (Major) compliance -		
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Contract agreements between Sg Tong POM and its FFB suppliers were made available for verification. Among the terms and conditions included in the agreement were FFB pricing, method and time of payment, FFB quality, and legal compliance obligations to name a few. Signatures by both parties were clearly available in the agreements and so far, there was no grievance with regards of unfairness of the contract.	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Sungai Tong POM guarantees prompt payments to its external FFB Suppliers, in alignment with the terms specified in the contract agreement. Sighted and verified the pricing mechanism for purchase of FFB from supplier were documented and agreed by both mill and the supplier. Such agreed pricing mechanism are as follows: i. Monthly FFB Pricing by sister estate (TDM Plantation Sdn Bhd) – refer to CADANGAN PEMBAHAGIAN HASIL MINYAK DAN ISI RONG BAGI BULAN SEPTEMBER 2023. Referral letter: KL-KKS/3/03.02 dated 1/10/2023 Therein recorded details of FFB process, CPO & PK produced, OER & KER percentage by individual estate base grading quality of FFB supplied. ii. Tawaran Penjualan Buah Tandan Segar bagi Bulan November 2023 ke Kilang Kelapa Sawit Sungai Tong. Supplier – SAxxxx Sxxxxx SDN BHD Harga MSM -Purata Harga MSM Bulanan MPOB Smenanjung Malaysia Harga Isirong - Purata Harga isirung Bulanan MPOB Smenanjung Malaysia	Complied

		 Kadar perahan Asas (KPA) – 19.65% Kadar Perhan Isirong (KER) = 4.50% Other charges such as processing charges, CPO transport, MPOB Cess, Selling commission CPO and PK. 	
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Weighbridges were calibrated on an annual basis to ensure no discrepancies in the payments made to the FFB suppliers. Calibration details are as follows: Weighbridge 1 No. Siri Alat: B849884849; Receipt Number: A3594864 Description: MPK(E) Mettier Toleou IND780, 70,000 Kg; Conducted By: De Metrology Sdn Bhd Date: 05/09/2023 Weighbridge 2 No. Siri Alat: E17618-0275 Receipt Number: A3594851 Description: MPK(E) Cardinal 205 80,000 Kg Conducted By: De Metrology Sdn Bhd Date: 14/06/2023	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Complied



5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Complied		
Criterio	Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.				
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -		Complied		
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -		Complied		
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Complied		
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling Critical (Major) compliance -	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Complied		
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Complied		
Princip	le 6: Respect workers' rights and conditions				

Criterio	n 6.1: Any form of discrimination is prohibited.		
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	TDM Plantation Sdn Bhd has revised the new Human Rights Policy / Polisi Hak Hak Asasi Manusia and Social Policy/Polisi Sosial dated 23 rd February 2023 by the new CEO. These policies stated the management commitment to treat everyone equally without any discrimination and provide equal opportunities regardless of race, nationality, gender and etc. For example, at Fikri Estate latest briefing on 25/06/23 was given to all workers during muster ground. Interviewed with workers confirmed that no discrimination practice by the management.	Complied
6.1.2	(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. - Critical (Major) compliance -	Based on review of employment contracts, interviews with various workers and stakeholders, Sg Tong POM certification unit is able to demonstrate that there is no form of discrimination involving workers and local communities. No recruitment fees charged to foreign workers and all recruitment cost (from country of origin to Malaysia) covered by the company. Foreign workers are not discriminated against and receive the same remuneration rate and access to amenities as local workers.	Complied
6.1.3	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. - Minor compliance -	Sg Tong POM certification unit's Foreign Workers Policy dated 23 rd February 2023 assures that recruitment, promotion and remuneration individual qualifications and performance are based on interview with workers. Based on interview of sampled workers and documentation review which included job application forms, interview notes, and medical fitness confirmation. Medical Checkup has been conducted by the panel clinic as part of mechanism to identify that the workers are fit to work and free from usage of drugs. Sungai Tong POM certification unit has demonstrated that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness.	Complied



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 -		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 -	Gender committee is in place and available at each operating units. Date of latest meetings as per the following: Pelung Estate – 26/10/2023 Pinang Emas Estate – 27/9/2023 Fikri Estate – 3/10/2023 There were issues discussed related sexual harassment, domestic violence as well as reproductive rights. No reported case of harassment and violence so far.	Complied
6.1.6	There is evidence of equal pay for the same work scope Minor compliance -	There is no any discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. This was confirmed during stakeholder's consultation, worker's interview, complaint book and trade union meeting. Based on verification of salary as per indicator 6.2.2 for both male and female workers (same work scope – mandore, field/general workers), evidence of equal pay was sighted with the same allowance and pay as per MAPA/NUPW collective agreement version 2019.	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).

5.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in			relevant provisions of the greement such as wages,
	national languages (English or Bahasa Malaysia) and explained to them			ne, annual leave, medical
	in language they understand.	leave are contained	d in employment contr	acts signed between the
	- Critical (Major) compliance -	company and each		
				slips which are issued to contains details such as
				ges wage for the month,
		overtime pay, paid	public holiday, paid me	dical leave (if any), price
				statutory deductions such (for Malaysian workers
		only), and other de		(101 FluidySluff Workers
				re prepared in languages
				alaysia and explained to vith the presence of a
			estate management was epresentative (if necess	
		The following emp	oloyment contracts and	payslips for (November
				[normal/average]) were
		·	ed during the audit: ate: (12 workers sampl	e out of 235 workers)
		PE2201xxx	<u> </u>	<u> </u>
			PE00xxx	PE230xxx0
		PE2301xxx	PE18xxx34	PE180xxx7
		PE0801xxx	PE08xxx83	PE23xxxx4
		PE0801xxx	PE080xxxx97	PE19xxxx5
		ii) Pelung Estate: (8 workers sample out o	f 95 workers)
		PL110xxx3	PL110xxx6	PL110xxx8

				1	
		PL110xxx5	PL110xxx1	PL110xxx0	
		PL11008xxx7	PL110xxx5		
		iii) Sg Tong POM: 8 w	orkers sample out of 9	99 workers	
		SM 00xx3	SM00xx4	SM0xx82	
		SM22xxx490	SM0xxx249	SM0xxx0235	
		SM09xxx61	SM09xxx196		
		iv) Jaya Estate: 13 wo	orkers sample out of 23	35 workers	
		JY2300xxx3	JY1400xxx	JY1700xxx	
		JY0900xxx6	JY17008xxx	JY1900xxx0	
		JY3301xxx	JY1100xxx	JY1800xxx	
		JY1800xxx	JY1400xxx5	EJ0613xxx	
		W6305xxx			
		v) Fikri Estate: 13 wor	rkers sample out of 23	6 workers	
		FK00xxx	FK1400xxx	FK2201xxx	
		FK15xxx38	FK1901xxx	FK2301xxx	
		FK14xxx81	FK1801xxx	FK2201xxx	
		FK23xxx86	FK2301xxx	FK2301xxx	
		FK23xxx49			
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal		ments and employm	naccurately recorded in ent contract was not	Non- compliance

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requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.

- Critical (Major) compliance -

Pelung Estate

i) Information recorded in the check roll book for harvester (piece rated), worker ID: PL1100948 as per below:

Task/work performed	Details	Rate per bunch/allowa nce rate	Total compensation paid
Buffer zone	Total harvested bunches: 386 *Inclusive work on rest day/Friday (25/11/2022)	RM2 per bunch	RM 772 inclusive of 40 harvested bunches on 25/11/22 *40 bunches was not calculated as double rate of pay
Public holiday work (field 17A2)	19, 20 & 28/11/22 Total harvested bunches: 420	RM 0.50 per bunch	RM 150 for 300 bunches *120 bunches was not paid
Rest day work, PH work	19, 20, 25 and 28/11/22	RM 50 per day	RM 100 paid



Inconsistent information recorded in the pay slip compared to check roll book for the said worker. 40 of harvested bunches on rest day (25/11/22) was not paid double rate of pay. Furthermore, harvested bunches (420) were not paid in full for public holiday work on 19, 20 & 28/11/22 and allowance for PH was only paid for 2 days.

- ii) Contract of service between Koperasi Sejahtera and employee with ID: 770112035621 under clause 4: "potongan KWSP akan dilakukan selepas tamat tempoh percubaan" which stipulate a term or condition of service which is less favourable to an employee.
- iii) Incorrect wages calculation in Plantware for the following samples:

Wages (normal day – piece)	Ordinary rate of pay	Estate/workers ID
RM 2,232.85 (14 days)	22.16	Fikri Estate (FK1801085)
RM 1,582.72 (18 days)	31.46	Fikri Estate (FK2301449)
RM 1,533.85 (26 days)	51.77	Pinang Emas Estate (PE2301606)

Normative reference:

i) Employment Act 1955, section 60(3)(d) - In the case of an employee employed on piece rates who works on a rest day, he shall be paid twice his ordinary rate per piece.

		ii) Employment Act 1955, Contract of Service, section 7: More favourable conditions of service under the Act to prevail; term or condition of service which is less favourable to an employee than a term of condition of service prescribed by this Act or any regulations. iii) MAPA/NUPW and other general employees and fringes benefits agreement, 2019 iv) Ordinary rate of pay (ORP): defined whether calculated by the month, the week, the day, the hour, or by piece rate, or otherwise, which an employee is entitled to receive under the terms of his contract of service for the normal hours of work for one day, but does not include any payment made under an approved incentive payment scheme or any payment for work done on a rest day or on any gazetted public holiday granted by the employer under the contract of service or any day substituted for the gazetted public holiday.	
		Thus, a major NC was raised.	
6.2.3	(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave,	Sg Tong POM and estates were able to demonstrate compliance with legal requirements on the following issues:	Complied
	reasons for dismissal, period of notice and other legal labour requirements Critical (Major) compliance -	Regular working hours: Workers interviewed confirmed that they work 6 days in a week, with Friday being the rest day. Normal working hours is 7.5 hours per day, and this is also stipulated in the employment contracts.	
		Deductions: Labour Department Permit for salary deductions is available in document JTK(T) 600.2.2.4 (6) dated 20/7/17 for salary deductions are subject to consent from workers.	
		Overtime, sickness and holiday entitlement: Based on overtime records, payslips, and interview with workers, evidence was	

		Act 1955 and MAPA/N For Sg Tong POM, ov hours based on appro (60). Maternity leave: fem	e is paid in accordance with the Employment UPW 2019 Agreement. Fortime hours approved for maximum of 130 val dated 09/08/17, ref: BHG.PU/9/134 JLD 9 Fortially workers are entitled to 98 days paid as was confirmed during interview with the er Committee	
6.2.4	(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. - Critical (Major) compliance -	sanitation, medical fact made to workers' ho compound are well may grass and household with All houses receive free is subsidised for RM rooms and in liveably include creche, suraut clinic. The clinic is may equipped with an amount of the conducted on a well-based on a	estates provide good housing with good cilities, and welfare amenities. Site visits were using. Overall, the houses and surrounding aintained with clean and flowing drains, no tall waste properly disposed of. e water up to 35 gallon per day and electricity 5 per house per month. Each house has 2 e condition. Among the amenities available, football field, sundry shop, canteen and a anaged by an Estate Health Assistant and is abulance. A visiting medical officer visits the as shown on the record. Line site inspection eekly basis by the Estate Hospital Assistant. Is spection as per the following:	Complied
		Estate/mill	Date of inspection	
		Fikri Estate	22/10/23, 15/10/23, 10/10/23, 1/10/23	
		Pelung Estate	29/10/23, 22/10/23, 15/10/23, 9/10/23, 3/10/23	



6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	Sg Tong POM and estates were able to demonstrate workers' access to adequate, sufficient and affordable food. There is a sundry shop and a food canteen near the line site. The sundry shop sells daily requirements such as vegetables, rice, flour, eggs, sugar, milk, cooking oil, frozen food, beverages, toiletries, etc. Quarterly cyprice monitoring was done operating units to ensure goods price is affordable to all workers.	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). 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. 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	Prevailing wages and in-kind benefits assessment conducted by Unit of Certification (UoC). As for 2020, a baseline/pilot project for the assessment was carried out at one sample estate (Fikri Estate). Fikri Estate is located in the region where all estates are locating nearby in the same localities. In-kind benefit: RM 957 Take home salary: RM 1,500 Total: RM2,457 Progressively, prevailing wages calculation will be extended to each operating units to set a benchmark value for reference.	Complied

6.3.1	(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa	Published statement in local language recognizing freedom of association policy is in place as documented in `Freedom of	Complied
freedom	on 6.3: The unit of Certification respects the rights of all personnel to form of association and collective bargaining are restricted under law, the employersonnel.		
6.2.7	Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal - Minor compliance -	Based on documents sighted and interviews conducted with workers and management, Sungai Tong POM and estates only employ full-time employees. All employees are employed on either permanent or contractual full-time basis	Complied
	- Minor compliance -		
	 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. 		
	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.		
	There is annual progress on the implementation of living wages		
	Updated assessment on prevailing wages and in-kind benefits		
	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:		
	with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations. 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 (RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).		



	Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented. - Critical (Major) compliance -	Association Policy / Polisi Kebebasan Berpersatuan dated 23 rd February 2023. Interview with workers has confirmed that they are not being restricted to join or form trade union.	
6.3.2	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. - Minor compliance -	For selected estates; there are no union representative available onsite. All union related matter is handled by the NUPW Terengganu Branch Secretary. Workers interview confirmed that the branch secretary visited them in several occasion to get feedback from workers. Meeting with management was carried at respective estates as per the following: Pelung Estate – 2/8/2023 Sg Tong POM – 17/7/2023 Pinang Emas Estate – 11/07/2023 Fikri Estate – 3/10/2023	Complied
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	As confirmed by the workers during interview, all worker representatives were freely elected among and by the workers themselves. They comprise various nationalities, and were selected based on experience, communication skills and number of years worked	Complied
Criterio	on 6.4: Children are not employed or exploited.		
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	TDM Plantation Sdn Bhd has developed Social Policy/Polisi Sosial and Protection of Children Policy/Polisi Perlindungan Kanak Kanak dated 1st January 2022; that states company's commitment for not exploiting, using and recruiting child labour which under 16 years old. Document reviewed, workers interview and stakeholder consultation confirmed that no historical child labour employed in the company. Youngest workers hired by the company is 18 years old.	Complied

6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance -	There was no evidence that Sg Tong POM and estates employ anyone below the age of 18 years. This was verified by examining the master lists of each operating unit. A documented age screening verification procedure exists where details of the workers' passport and IC and dates of birth are reviewed and verified before issuance of employment contracts. Copies of identity cards and passports were sampled and verified during the audit. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.	Complied
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	Based on documents sighted, interviews and observations, there was no evidence that Sg Tong POM and estates employ any young persons. This was further verified by examining the master lists of each operating unit where details of the workers' IC numbers and dates of birth are available. Interviews with workers and staff, as well as observations made during field visits confirm that only those above 18 are employed.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	TDM Plantation Sdn Bhd has developed Social Policy/Polisi Sosial and Protection of Children Policy/Polisi Perlindungan Kanak Kanak dated 1st January 2022; that states company's commitment for not exploiting, using and recruiting child labour which under 16 years old. Document reviewed, workers interview, and stakeholder consultation confirmed that no historical child labour employed in the company. Youngest workers hired by the company is 18 years old.	Complied
Criterio	on 6.5: There is no harassment or abuse in the workplace, and reproductive	e rights are protected.	
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Gender Policy was developed and implemented in TDM Plantation Sdn Bhd where the company has the responsibility to take care the rights of workers. Latest policy dated 23 rd February 2023 endorsed	Complied

		by the new CEO was sighted. They will protect the rights of all workers and action will be taken immediately if there is any sexual harassment, domestic violence and any type of harassment case reported. The policy has been communicated during morning muster briefing for all operating unit, it has been verify based on training records. Further verification has been conducted through interview with sample workers where the understating were demonstrated.	
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Polisi Reproduktif / Reproductive Rights Policy and Social Policy is in place, signed by the CEO dated 23 rd February 2023. Policy states company commitment not interfering in reproductive planning of the workers and ensuring rights of workers to decide and avoidance in discriminating and harsh treatment to the subjected workers. The policy has been communicated during morning muster briefing for all operating unit, it has been verify based on training records. Further verification has been conducted through interview with sample workers where the understating were demonstrated.	Complied
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -		Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -		Complied



		reported. For other harrasments, workers can lodge complaint through the procedure & Prosedur Aduan / Rungutan.	
Criterio	on 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: 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 Critical (Major) compliance - 	Based on documentation review and interviews with the workers, Sungai Tong POM and estates have demonstrated that workers of various nationalities have entered into employment voluntarily. Consent letters from workers were also sighted. No recruitment fee charged to foreign workers. The contract signed between TDM Plantation Sdn Bhd and PT Primadaya Pratama Pandukarya, dated 2 nd February 2020 also clearly stipulates that recruitment fee would be borne by the company. Workers were aware of the type of job they would be doing at the estate/mill before they left their own countries. All overtime work is done voluntarily, and workers are free to decline an offer for overtime work. Workers are also paid overtime rates in accordance with the Employment Act 1955. Workers are free to resign at any time they wish with no penalty payment. There is also no evidence of any withholding of wages.	Complied
6.6.2	(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented. - Critical (Major) compliance -	Foreign Worker Policy (Polisi Pekerja Asing), signed by the Chief Executive Officer dated 1 st January 2022 is in place. The policy states the commitment of the company to ensure recruit of migrant workers shall adhered to the Employment Act 1955, Immigration Act 1959/63 and Compensation Workmen Act 1952 and paid with reasonable wage according to the legal requirement. Based on the selected records, all migrant workers are found hired according to the legal requirement and provided with mandated benefits and minimum wage.	Complied



6.7.1	(C) The responsible person(s) for H&S is identified. There are records of	Jaya Estate	Complied
0.7.1	regular meetings between the responsible person(s) and workers.	The management has appointed the estate manager for the OSH	Complied
	Concerns of all parties about health, safety and welfare are discussed at	Chairman for the estate. Appointment letter dated 01/07/2022 with	
	these meetings, and any issues raised are recorded.	Ref No: TDMP/OD/07/60-10 verified the appointment. The	
	- Critical (Major) compliance -	Organisation Chart on safety details the chairman, secretary, employer representative, and employee representative roles.	
		The meeting was conducted once in each quarters, the minutes of	
		meeting was verified as discussing the safety and health issues, worker's welfare are discussed and minutes. The meeting was	
		conducted as followings:	
		1. Quarters 03/2023 – 12/09/2023	
		2. Quarters 02/2023 – 11/05/2023	
		3. Quarters 01/2023 – 20/02/2023	
		4. Quarters 4/2022 – 20/12/2023	
		Sungai Tong Palm Oil Mill	
		Mill manager was appointed as OSH chairman. Reference made to the appointment letter dated 01/07/2022 with Ref No: TDMP/OD/07/60-10.	
		The Organisation Chart on safety details the chairman, secretary, employer representative, and employee representative roles.	
		The meeting was conducted once in each quarters, the minutes of meeting was verified as discussing the safety and health issues, worker's welfare are discussed and minutes. The meeting was conducted as followings:	
		1. Quarters 03/2023 – 20/09/2023	
		2. Quarters 02/2023 – 22/06/2023	
		3. Quarters 01/2023 – 22/03/2023	



4. Quarters 04/2022 - 27/12/2023

Pinang Emas

Estate manager was appointed as OSH chairman. Reference made to the appointment letter dated 01/07/2022 with Ref No: TDMP/OD/07/60-10.

The Organisation Chart on safety details the chairman, secretary, employer representative, and employee representative roles.

The meeting was conducted once in each quarters, the minutes of meeting was verified as discussing the safety and health issues, worker's welfare are discussed and minutes. The meeting was conducted as followings:

- 1. Quarters 03/2023 26/09/2023
- 2. Quarters 02/2023 12/06/2023
- 3. Quarters 01/2023 22/03/2023
- 4. Quarters 04/2022 28/12/2023

Fikri Estate

Estate manager was appointed as OSH chairman. Reference made to the appointment letter dated 01/07/2022 with Ref No: TDMP/OD/07/60-10.

The Organisation Chart on safety details the chairman, secretary, employer representative, and employee representative roles.

The meeting was conducted once in each quarters, the minutes of meeting was verified as discussing the safety and health issues, worker's welfare are discussed and minutes. The meeting was conducted as followings:

1. Quarters 03/2023 - 19/09/2023

		 Quarters 02/2023 - 25/06/2023 Quarters 01/2023 - 26/03/2023 Quarters 04/2022 - 07/12/2023 	
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 equipment is available at worksites. Records of all accidents are kept and periodically reviewed. - Minor compliance -	The procedures for handling accidents and emergencies are wellestablished and accessible within TDM Plantations Sdn Bhd. These procedures are documented in the Standard Operating Procedure titled "Emergency Preparedness & Response," dated 01/01/2018, under Ref No TDMP-01/2018. An Emergency Response Plan (ERP) team has been formed to address various identified incidents. To enhance accessibility and understanding, these procedures have been condensed into flowchart formats and displayed for all employees to reference. The emergencies covered include fire, chemical spillage, floods, and workplace accidents. The management has communicated the procedures to the workers, sample of records sighted as the following: 1. Jaya Estate – 08/08/2023 2. Sungai Tong Palm Oil Mill – 13/09/2023 3. Pinang Emas Estate – 22/03/2023 4. Pelung Estate – 24/10/2023 5. Fikri Estate – 30/08/2023 During site visits to the mills and estates, it was observed that all workstations and operations were adequately equipped with fire extinguishers and first aid kits. Interviews with employees and workers indicated a good understanding of the emergency procedures. Sighted the records of trainings at each estates, details as followings: 1. Jaya Estate – 20/09/2023 2. Sungai Tong Palm Oil Mill – 12/06/2023	Complied



- 3. Pinang Emas Estate 22/03/2023
- 4. Pelung Estate 11/10/2023
- 5. Fikri Estate 04/09/2023

Furthermore, the mill has established an Emergency Response Team (ERT) led by the Mill Manager. The ERT chart, Fire Hydrant locations, and Fire Extinguisher Map have been prominently displayed on various notice boards within the mill. First aiders have been designated at multiple workstations in the mill and estates, and they are responsible for maintaining the first aid kits at their respective workstations or operations. Workers in both the mill and estate field operations demonstrated awareness regarding the emergency procedures, including actions to take in case of an accident, the designated person responsible for each first aid box, and the location of the nearest first aid kit.

Accident records are consistently maintained by the mill and estates on a monthly basis and are submitted to the headquarters as required. Additionally, JKKP 6, JKKP 7, and JKKP 8 forms are readily available for verification purposes.

Jaya Estate

There are six accidents happened in the year 2023. The management has fill and sent the JKKP 6 forms for each accidents and submitted to DOSH. The management has conducted the review on each accident. Report to DOSH dated 26/07/2023 with Ref No: TDMP/SIASATANPENUHDALAMAN/23/06 is verified.

JKKP 8 submission was submitted on 15/01/2023 with Ref No: JKKP8/129111/2022

Sungai Tong Palm Mill

There are two accidents happened in the year 2023. The management has fill and sent the JKKP 6 forms for each accidents

		and submitted to DOSH. The management has conducted the review on each accident. Sighted the accident investigation reports conducted for both accidents and communication on the accidents were brief to all the workers.	
		JKKP 8 submission was submitted on 08/01/2023 with Ref No: JKKP8/123341/2022	
		Pinang Emas Estate	
		There are five accidents happened in the year 2023. The management has fill and sent the JKKP 6 forms for one accidents and submitted to DOSH which taken 45 days of medical leaves, the other 5 accident are without MC. The management has conducted the review on the accident during the safety meeting conducted on 20/09/2023	
		JKKP 8 submission was submitted on 18/01/2023 with Ref No: JKKP8/131721/2022	
		Pelung Estate	
		There are eight accidents happened in the year 2023. Of which the management has conducted meeting for accident investigation for all accidents. Management has issued JKKP6 for two accidents that received the medical leaves of 5 days and more.	
		JKKP 8 submission was submitted on 30/01/2023 with Ref No: JKKP8/140688/2022	
		<u>Fikri Estate</u>	
		JKKP 8 submission was submitted on 18/01/2023 with Ref No: JKKP8/117015/2022	
6.7.3	(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	The management adheres to a structured approach for providing employees with suitable Personal Protective Equipment (PPE), following the principles of Hazard Identification, Risk Assessment,	Complied

	those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. - Critical (Major) compliance -	and Risk Control (HIRARC). The process is guided by a PPE Matrix and Standard Operating Procedure. A well-maintained record of PPE issuance is in place and readily available for verification. This record contains essential information such as the employee's name, the specific type of PPE provided (including items like aprons, safety shoes, rubber boots, N95 masks, respirators, cartridges, helmets, goggles, cotton gloves, nitrile gloves, etc.), the date when the PPE was received, and acknowledgment of receipt by the recipient. This ensures that employees have access to the necessary protective gear in line with safety guidelines and procedures.	
		During site visits to all the sampled sites and their respective activities, it was observed that the workers consistently and correctly used the provided Personal Protective Equipment (PPE). Interviews conducted with the workers further confirmed that the PPE was distributed to all workers free of charge, highlighting the commitment to ensuring the safety and well-being of the workforce.	
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. - Minor compliance -	Should there be any medical care needed by the employees, clinics with certified Medical or Hospital Assistants in-charge were provided at all the sampled management units. Based on site visits, all the clinics were well maintained and managed. Records of medical inventory, VMO visits, and patients treated were made available for verification.	Complied
		The sampled estates and mill are subscribing to SOCSO to cover the accident insurance for all their workers. Latest monthly contributions were verified and confirmed with the following details:	
		Jaya Estate: Sample of SOCSO Contribution made for the month of July, August, and September 2023 is available for review. Sighted the	



Acknowledgement Contribution Received (ACR) Number and Payment Voucher with details as following:

- 1. July 2023 ACR082230054585 RM 9,047.70
- 2. August 2023 ACR092230039353 RM8,956.90
- 3. September 2023 20230005155569 RM9,324.70

Sungai Tong Palm Oil Mill:

Sample of SOCSO Contribution made for the month of June August and September 2023. is available for review. Sighted the Acknowledgement Contribution Received (ACR) Number with details as following:

- 1. June 2023 ACR072230253525 RM 4,510.20
- 2. August 2023 ACR082230162171 RM 4,720.60
- 3. October 2023 ACR112230097687 RM 4,679.20

Pinang Emas Estate:

Sample of SOCSO Contribution made for the month of January – March 2023 is available for review. Sighted the Acknowledgement Contribution Received (ACR) Number with details as following:

- 1. January 2023 ACR022230137465 RM 7,149.50
- 2. February 2023 ACR032230107082 RM 6,587.60
- 3. March 2023 ACR042230059156 RM 7,701.00

Pelung Estate:

Sample of SOCSO Contribution made for the month of June, August and October 2023 is available for review. Sighted the Acknowledgement Contribution Received (ACR) Number with details as following:

- 1. June 2023 ACR072230062966 RM 3,297.40
- 2. August 2023 ACR092230089825 RM 3,412.60

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		3. October 2023 – ACR112230097509 – RM 3,185.90	
		Fikri Estate:	
		Sample of SOCSO Contribution made for the month of June, August	
		and October 2023 is available for review. Sighted the	
		Acknowledgement Contribution Received (ACR) Number with details	
		as following:	
		1. June 2023 – PV167/07 – RM 8,313.30	
		2. August 2023 – PV210/09 – RM 8,768.20	
		3. October 2023 – ACR112230211198 – RM 8,816.00	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA)	The Lost Time Injury Frequency Rate (LTIFR) metrics from RSPO	Complied
	metrics.	were utilized to record lost time injuries and total work hours	
	- Minor compliance -	between January and December 2022. A comprehensive verification process involved cross-referencing with records like JKKP 8,	
		affirming the accuracy and reliability of injury and work hour data	
		for that period.	
Princip	le 7: Protect, conserve and enhance ecosystems and the environm	ent	
Criterio	on 7.1: Pests, diseases, weeds and invasive introduced species are effective	ely managed using appropriate Integrated Pest Management (IPM) tech	nniques.
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest	Sungai Tong Palm Oil Mill and Supply Bases continued to monitor	Complied
	control.	the Implementation of Integrated Pest Management (IPM) plans.	·
	- Critical (Major) compliance -	a) The estates had in place documented the IPM plan which covered monitoring of pest, control of pest population levels	
		at below threshold levels by using cultural, biological,	
		physical/mechanical and use of pesticides. The plan was	
		guided by SOP ref O8.08 dated July 2019.	
		b) In order to minimize use of insecticides on leaf-eating pest,	
		the estates planted beneficial plants such as <i>Turnera</i>	
		subulata, Cassia cobanensis, Antigonon leptopus, along the	
		roadsides and designated points in the fields and also within	
	1	the nursery perimeter. To develop beneficial plant nursery	

...making excellence a habit."

		comprised of the beneficial plant. c) The plan also advocated single layer EFB mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and diseases had been continued. These monthly detection and observations were carried by staff. d) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year where recommended by the PC /Agronomist. Baiting are continued until bait acceptance threshold level	
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	This is not practiced in the 4 estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	There was no land preparation in Sungai Tong Palm Oil Mill and Supply Bases by burning ever since TDM practiced zero burning as per the policy in: a) TDM P01-SOP-Section 01/2011 - Under felling/clearing & land preparation b) Environmental & Biodiversity Policy TDM Plantation has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in	Complied
Critorio	on 7.2: Pesticides are used in ways that do not endanger health of workers	the estate No fire was used for waste disposal.	

7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	The justification of all pesticides used in the estate were documented in Agricultural Reference SOP Section A11 & A12 Standard Book. The manual provides the guideline on type of agrochemical use, target pest/weed/disease, weed situation, recommended chemical brand name, application rate, and method of application. Verification of chemical register, chemical issuance records, and site visits showed that the pesticides used were in accordance with the justification in the manual.	Complied
7.2.2	(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. - Critical (Major) compliance -	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 estates. Based on the records, the total a.i per ha for 2022 and 2023 is available for review. Sample of records sighted are as followings: 1. Jaya Estate - July 2023 – 0.08 - August 2023 – 0.04 - September 2023 – 0.03 - October 2023 – 0.03 2. Pinang Emas Estate - March 2023 – 0.06 - May 2023 – 0.06 3. Pelung Estate - January 2023 – 0.103 - February 2023 – 0.103 - February 2023 – 0.151 - March 2023 – 0.117 4. Fikri Estate	Complied

		- May 2023 – 0.107 - June 2023 – 0.191 - July 2023 – 0.212	
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans Critical (Major) compliance -	The Agricultural Reference Standard Operating Procedures (SOP) in Sections A11 and A12 of the Standard Book meticulously outline the quantities and justifications for agrochemicals required under various field conditions. These guidelines offer detailed information about the selection of agrochemicals, their intended targets (pests, weeds, or diseases), the prevailing weed situation, recommended chemical names, application rates, and application methods.	Complied
		Through a verification process involving chemical registers, chemical issuance records, and on-site visits, it was confirmed that the use of pesticides adhered to the justifications provided in the manual. Additionally, beneficial plants designed to support leafeating predators were strategically planted along the estate's roadsides.	
		The consistent implementation of these practices in the field reflects a strong commitment to following the established SOP. Notably, all sampled estates have discontinued the use of Class I herbicides, indicating a dedication to safer and more environmentally responsible agricultural practices.	
		Furthermore, the management issued a memo on 13/01/2021, emphasizing the standardization of fungicide and pesticide treatments for TDM Plantation estates. This memo suggests specific active ingredients for addressing various pest issues. Guidelines for nurseries include alternating fungicides based on attack severity and avoiding evening watering on application days. Additionally, specific pesticide usage requires approval to ensure compliance with established protocols.	

7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	There was no evidence of prophylactic use of pesticide at all the sampled estates.	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 -	At all the sampled estates, there has been a strict adherence to not using pesticides categorized as World Health Organization Class 1A or 1B, or those listed by the Stockholm or Rotterdam Conventions. This commitment to not using such pesticides was verified through a comprehensive process, which included visits to the pesticides stores, reviewing inventory records, examining chemical registers submitted to the appropriate authorities, referencing CHRA reports, and conducting interviews with employees. This rigorous verification process ensures that these hazardous pesticides are not in use, emphasizing a responsible and safe approach to pest management.	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 -	Training programs focused on the safe handling of chemicals and the correct spraying methods were provided to relevant employees, including storekeepers, pre-mixers, and herbicide sprayers. This initiative aligns with the recommendations from the CHRA assessor, emphasizing the importance of safety and proper techniques. To ensure the effective transfer of knowledge, a variety of training methods were employed, including briefings, practical training sessions, and on-the-job supervisions. This multifaceted approach aimed to guarantee that employees fully understood and could implement safe chemical handling and spraying practices.	Complied

		 Additionally, comprehensive records of these training sessions were diligently maintained for verification purposes. A couple of sample training records include: Jaya Estate – March 10, 2023, during trunk injection training. Pinang Emas Estate – June 20, 2023, focusing on chemical mixing and chemical handling training. Pelung Estate – Chemical handling training – 23/08/2023 Fikri Estate – Chemical handling training – 25/10/2023 	
7.2.7	(C) Storage of all pesticides is in accordance with recognised best practices. - Critical (Major) compliance -	Pesticides were found stored in 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 to prevent unauthorised entrance. The hazard signage was observed to be adequately displayed on the exterior and interior walls. Ventilation facilities and safety data sheets were also adequately provided.	Complied
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 -	Unused chemical containers not utilized for premixing were responsibly managed. They underwent a thorough process of triple rinsing and puncturing before being classified as scheduled waste. The disposal was carried out through waste collecting contractors in compliance with Indicator 7.3.2.	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 -	Aerial spraying of pesticides is not practiced in the sampled estates.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Jaya Estate	Complied

	- Critical (Major) compliance -	The CHRA report stated that there is no need to conduct the annual medical surveillance for pesticide operators. However, the management has conducted the monthly health surveillance checking for all pesticides operators. Sighted the records of health surveillance for the month of January 2023 until October 2023, which was available for review. Pinang Emas Estate The CHRA has recommended the medical surveillance to be conducted every year. The management has conducted the medical surveillance on 15 and 18/03/2023 for 25 workers. All workers are declared fit.	
7.2.11	(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. - Critical (Major) compliance -	The on-site observations, employee master list verification, and interviews at selected estates confirm the absence of individuals under 18, pregnant or breastfeeding women, and individuals with medical restrictions engaged in pesticide-related work. These protective measures prioritize employee safety. Additionally, the management's Reproductive Policy, implemented on 23/02/2023, safeguards female workers by prohibiting their involvement in chemical-related tasks from pregnancy confirmation until 24 months post-birth, ensuring their well-being during this crucial period.	Complied
Criterio	on 7.3: Waste is reduced, recycled, reused and disposed of in an environment	entally and socially responsible manner.	
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. - Minor compliance -	Sungai Tong Mill and the 4 estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2023 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were:	Complied
		Receptor Sources	

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1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)-GHG
2	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down
3	Land	Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.

All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan 2023. The waste generated from the mill/estates operations as shown below:

_	I	
	Type of waste	Details
1	Scheduled waste	Spent IPA, hexane, filter, lubricants,
1	Scrieduled waste	hydraulic oil, grease, used batteries
2	Domestic waste	rubbish from the mill/estate complex and
_	Domestic waste	employees' quarters
2	Industrial waste	Fiber, palm kernel shell, boiler ash, scrap
د	Thuusthal Waste	iron

The pollution identified from the mill/estates activities:

	Type of waste	Details			
1	Black smoke	Emission	from		
		Boilers/veh	icles/en	gines	
2	Odor & gases	Activities	from	the	effluent
		treatment			



		3 Leakage of Storage & vehicle maintenance lubricant	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	Sungai Tong POM and the estates in the North Zone adopted a procedure TDM Section B Ref no 89 – Scheduled Wastes (Hazardous Waste) Management. a) Waste Management Plan 2023 has been established and reviewed annually recent being in Jan 2023. b) Based on Environmental Impact Evaluation and Environment Aspect and Impact Identification improper disposal of wastes will impact on community, depletion of natural resources and land contamination. c) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner. d) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The Mill/Estates scheduled waste are disposed to licensed contractor M/s Pentas Flora (Kelantan) Sdn Bhd registration no 004878 valid effective 21/01/20. SW404 is dispatched to Southern Medi One Sdn Bhd located in Pasir Gudang Johor. e) Details of despatches as follows; Estate Date SW 410 SW305 SW 409 -	i



	04/44/22	0.045	1 000	0.420	
Jaya	01/11/23	0.045	1.000	0.430	-
Jaya	22/05/23	0.040	0.200	0.030	-
Pinang Emas	04/09/23	0.075	0.120	0.120	-
Pinang Emas	28/02/23	0.038	0.300	0.005	-
Pelung	01/11/23	0.070	0.150	0.050	-
Pelung	26/06/23	-	0.150	0.070	-
Fikri	01/11/23	0.020	0.200	0.400	-
Fikri	17/05/23	0.015	0.200	0.206	1-
TIKIT	17/03/23	0.013	0.200		
				10.200	
	SW 404 (C				<u> </u>
Jaya	SW 404 (0	Clinical wa	aste)		-
	SW 404 (0	Olinical war Qty/mt 0.0032	aste) Date	Qty/mt	
Jaya	SW 404 (CDate 01/10/23 01/10/23	Olinical was Qty/mt 0.0032 0.0014	Date 29/3/23	Qty/mt 0.0019 0.0010	-
Jaya Fikri	SW 404 (CDate 01/10/23 01/10/23	Clinical wa Qty/mt 0.0032 0.0014 th Ladang	Date 29/3/23 29/3/23	Qty/mt 0.0019 0.0010	-
Jaya Fikri Pelung Pinang	SW 404 (CDate 01/10/23 01/10/23 Shared wi	Clinical wa Qty/mt 0.0032 0.0014 th Ladang	Date 29/3/23 29/3/23 2 Jaya Clinio	Qty/mt 0.0019 0.0010	-
Jaya Fikri Pelung Pinang	SW 404 (CDate 01/10/23 01/10/23 Shared wi 29/03/23 Date	Olinical war Qty/mt 0.0032 0.0014 th Ladang 0.004	Date 29/3/23 29/3/23 2 Jaya Clinio	Qty/mt 0.0019 0.0010	-
Jaya Fikri Pelung Pinang Emas	SW 404 (CDate 01/10/23 01/10/23 Shared wi 29/03/23	Olinical war Qty/mt 0.0032 0.0014 th Ladang 0.004	Date 29/3/23 29/3/23 3 Jaya Clinic 1/10/23	Qty/mt 0.0019 0.0010	-

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		Ma fol	omestic was ajlis Daerah Ilows; Evide /9/23 ref P\						
			Unit	Disposal site	Remarks				
			Jaya	Majlis Daerah Setiu	Collection 2/3 x week				
			Fikri	Majlis Daerah Setiu	Collection 2/3 x week				
			Pelung	Majlis Daerah Setiu	Collection 2/3 x week				
			Pinang Emas	Field no P 99/A2	Collection 2/3 x week				
			STPOM	Majlis Daerah Setiu	Collection 2/3 x week				
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -		rth Zone Estates by burning rning as per the following	Complied					
		c) d)	paration al Policy & Biodiversity Policy						
		TDM Plantation has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.							

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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 -	Procedu emphas manage integral reflects the nut yield. To conside environ results	Sungai Tong Estates in the CU not only follows Standard Operating Procedures (SOP) meticulously across various processes but also emphasizes comprehensive soil management for optimal yield. The management has conducted a soil test, and the results have been integrated into the formulation of the manuring plan. This approach reflects a commitment to precision in agricultural practices, ensuring that the nutrient requirements of the soil are met to enhance overall crop yield. The SOP covers all estate and mill operations, incorporating considerations for Good Agricultural Practice, safety, health, and environmental concerns, including the careful integration of soil test results into the manuring plan for sustainable and efficient agricultural practices.						
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 -	monito for the the ind carbon recomr Dept of and to growth	r ch fer icat and men f He sug im had	nanges in nutr tilizers input re- tion of soil hea d total nitroge dation was co ead Office to fo ggest relevant provement. And d been carried	ient status and ecommendation of the agronomic praudicted by After agronomic praudicted in all estates and the estates and	carried out in the Est its results formed the its results formed the its results formed the its results formed the its results analysis properties for oil palm yield the its results for	e basis rovided organic ertilizer dvisory iramme eld and K, Mg,	Complied	
			2		30/07/2023 23/08/2023	LE/2023/07/214 LPE/LS/02/09-23			
			3	Pelung	27/07/2023	LE/2023/07/213			

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			4	Fikri	31/05/2023	LFK/RS/10	0/07/23		
		Soil a	analv	sis for PH Or	rg C, Total N, T	otal P Avail	I P Fych K	Fych	
		Ca & Exch Mg was carried out on a 5-year cycle basis with lat made on the following date:							
			_						
				Estate	Report Date	Report N			
			1	Jaya	14/12/2021	JE/2023/	03/11		
			2	Pinang	24/11/2022	SE/2022	/12/172		
				Emas		5=, ====,	, ==, = ; =		
			_		46/44/2022	445/15/1	FF (4.4. DD		
			3	Pelung	16/11/2022	AAD/LP/	55/11-22		
			4	Fikri	16/11/2022	AAD/LP/	55/11-22		
							,		
					oling & analysis			CL of	
		Joho	r Pla	ntation Bhd. F	Reports were sig	hted and ve	erified.		
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of	All th	ne e	states visited	had a nutrient	recycling s	strategy in	place	Complied
7.1.5	Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues				g pruned frond				complica
	and optimal use of inorganic fertilisers.	deco	mpo	se, grass cutti	ng harvesters p	aths and let	ting the cut	mass	
	- Minor compliance -				ld, EFB mulching				
				pped,					
				states					
		had							
		2022							
						<u> </u>		, l	
				Estate	Field no Ha		Mt		
			1	Jaya	P04/A1 12	2.59 2	269.70	1	
				Juyu	101/71	2.55	205.70		

		2	2]	aya	P05/A2	122.86	280.10		
		3	,	rinang Emas	P20A1	41.19	106.30		
		4	l P	rinang Emas	P21A4	54.42	148.05		
		5	5 P	elung	P17A1	61.12	129.57		
		ϵ	5 P	elung	P17A3	63.26	107.54		
		7	7 F	ikri	P00A3	66.03	638.90		
		8	3 F	ikri	P04A3	70.43	180.40		
7.4.4	Records of fertiliser inputs are maintained Minor compliance -	progra monito fertilize that th	im sl oring ers w ne ac	heets, bin ca forms, etc. vere reviewed ctual fertilizer	ards, field Records of by auditors applied	cost book of program r. Review o in 2022/2	ed using recor, Fertilizer Apples and application of the records reads was in line was lied in the esta	lication ions of evealed with the	Complied
		recom	mend	Fertilizer	Kg/pali		cation month		
			1	ECOFER	10.00	Feb			
			2	RRP	2.00	April			



			5	CPD33	3.50	Feb		
			6	RP	0.50	Aug		
			7	CRF1	0.40	Aug		
			8	GML	2.00	June		
			9	МОР	1.00	July		
			10	Boro Mag	0.50	July		
				_		·		
		·				·		
Criteri	on 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 -	drainag	je, pa	rent materi	ial and key a		texture, depth gement was also fied as follows:	
		No	Fikri	Ja	ıya	Pelung	Pg Emas	
		1	Alma	a Alı	ma	Bungor	Bungor	
		2	-					
			Awa	ing Av	wang	B Lapan	Batu Lapan	
		3	Awa			B Lapan Btg Merbau	Batu Lapan Pdg Besar	
			Bun	gor Bu	ungor			
		3	Bung B La	gor Bu		Btg Merbau Penambang	Pdg Besar Bkt Tuku	
		3 4 5	Bung B La	gor Bu ipan Bii ai Li	ungor njai Itek	Btg Merbau Penambang Rengam	Pdg Besar Bkt Tuku Chempaka	
		3	Bune B La Binja Merl	gor Bu apan Bir ai Li bau Be	ungor njai	Btg Merbau Penambang	Pdg Besar Bkt Tuku	



			T	1	1	1	
		8	Jabil	Gondang	-	Lubuk Itik	
		9	Kg Pusu	Gali	-	Binjai	
		10	Kerayong	Kuala Brang	-	Marang	
		11	Lundang	Kerayong	-	Rengam	
		12	Chempaka	Rengam	-	Tebok	
		13	Rengam	Tepus	-	Telemong	
		14	Pak Bong	Tai Tak	-	Tok Yong	
			were no othe on the 4 estat	•	(e.g. podzols	and acid sulphate	
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.	have a management strategy for planting on slopes in order to					Complied
	- Minor compliance -	b) B c) L It wa degra frond const veget and i been	uffer Zone & and Preparation of some compost ruction in interlation of some matur planted along	at practices to rils were in place application, average, road mainted lines. Cover cross as a come slopes by some slopes by a come slope slo	e SOP g in SOP Section minimize and concert through providence of enance and more personal management manageme	on 3.5 ref TDM P01 control erosion and proper stacking of blanket spraying, aintenance of soft and in the replants aruna bracteata had to Large areas with ed during the visit.	

		The follo		· 		Fikri 46.94 32.44 17.82 2.80 0.00 100.00	Pelung 14.92 13.54 19.54 38.93 13.07	Pg Emas 48.68 12.09 13.98 20.76 4.49 100.00	
7.5.3	There is no new planting of oil palm on steep terrain Minor compliance -	being CEO "Slop deve	addate date of	dressed in the ed July 2020 s f >25 degree	e "Slope a stating the e to be e anting pr	and River following excluded fogram. Fo	Protection among of rom any or slope	new plantation <25 degree the	Complied
Criterio operatio	7.6: Soil surveys and topographic information are used for site planning ns.	in the	esta	blishment of	new plant	ings, and	the resul	lts are incorporate	d into plans and
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 -	Topo to m Serie estat	grap anag s Ma es.	phic contour r ge the draina aps are issued	maps are ge and ro I by the A e auditor	also availa bad works AD dated	able which in the expective respective in the expective i	p at the estates. ch are both used estates. The Soil rely for individual no new planting	Complied



7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	This is addressed in the TDM Plantation Environmental & Biodiversity Policy signed by the CEO on 23/02/2023 i.e., to avoid extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. However, the auditor verified there is no new planting activity in the estates visited.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys are made and available in a soil map at the estates. Topographic contour maps are also available which are both used to manage the drainage and road works in the estates. The auditor verified there is no new planting activity in the estate visited.	Complied
Criterio	on 7.7: No new planting on peat, regardless of depth after 15 November 20	118 and all peatlands are managed responsibly.	
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	There is no new planting in all the estates visited. There is no peat soil or soil categorized as marginal or fragile soil all estates visited.	Complied
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 -	There is no new planting in all the estates visited. There is no peat soil or soil categorized as marginal or fragile soil all estates visited.	Complied
7.7.3	(C) Subsidence of peat is monitored, documented and minimised Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.	Complied
7.7.4	(C) A documented water and ground cover management programme is in place Critical (Major) compliance -	The water and ground cover management programme is documented in the TDM Plantation Standard Operating Procedure - Management in Coastal and Peat lands). Details are described in	Complied

		 7.8.1. individual estates and mill had their respective water management plan mainly to monitor among others the following; a) Monitor the quality of main water inlet/outlet for pollutants from estate's operations. b) Water management and drainage system in the fields. c) Contingency during water shortage. d) Monitor the usage of fresh water on monthly basis e) Reuse/recycle waste water. There is no peat soil or soil categorized as marginal or fragile soil at all estates visited. 	
7.7.5	(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. This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition. - Critical (Major) compliance -	all estates visited.	Complied
7.7.6	(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. - Critical (Major) compliance -		Complied

7.7.7	(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. - Critical (Major) compliance -		nere is no pe estates visit		l as marginal or fragile soil at	Complied
Criterio	on 7.8: Practices maintain the quality and availability of surface and ground	wat	er.		<u> </u>	
7.8.1	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: a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. b) Workers have adequate access to clean water. - Minor compliance -	fc average and average and by c) d) e) f)	or year 2023 vailability of fficient water i Implemen i Construct effective daily mor i Establishi Side drair Enhancer	which was developed to natural water resources consumption through valued in the consumption of the consumption of the consumption of water gate and so management of field drawit or in the consumption of	cheduled water pumping for hins and field water level. eduled maintenance had to prevent erosion, water, frond stacking, on at bare ground area.	Complied
		Т	he water sou	irces are as shown belov		
			sources	Usage	Monitoring & measurement	
		1	SATU	Purchased for domestic consumption	Monitoring water supply	
		2	Rainwater	Domestic use Workshop Chemical mixing	Rain fall data	

Th	tank ne contingend	Emergency water supply cy plan during water shortage nt Action steps
1	Water shortage/ prolonged of season	To obtain water from local authority /estate catchment To train/educate staff/workers to conserve
2	Severe war pollution/ Contaminati n	To obtain water from local authority To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP
	vered: a) Water s b) Water p c) Reduce d) Identific e) Monitor	shortage contingencies collution prevention wastage cation & management of waste waters ring rainfall water quality analysis.

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Water management plan review date was sighted and verified v	vith
records as follows;	

	Estate/Mill	Review date	Issues
1	Jaya Estate	02/10/2023	Nil
2	Fikri Estate	12/06/2023	Nil
3	Pelung Estate	11/07/2023	Nil
4	Pinang Esmas Estate	07/03/2023	Nil
5	Sungai Tong POM	01/09/2023	Nil

The water reduction plan is shown below;

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



-	The Mill Identification & Management of Wastewater					
		location	Wastewater produced	Treatment/ containment	Reuse/ recycle/disp osal method	
		Processin g stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ ETP	Recover into system	
	2	Boiler		Sludge pit, ETP	Monsoon drain	
		Process ramp	Rainfall runoff	Sedimentatio n trap	Monsoon drain	
	3		<u> </u>	Monsoon drain, recycled tank	Monsoon drain	
	4	Laborator y	Cleaning water	Process drain	Monsoon drain	
	5	Washroo m	Toilet water, cleaning water	Septic tank	Collected by licensed contractor.	
		<u> </u>				



		water	All employees including the workers had adequate access to clean water as the entire supply for all the estates and mill in the TDM North Zone are from SATU (Syarikat Air Terengganu).								
7.8.2	(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. - Critical (Major) compliance -	mainta the na Planta applica and w approp River I Planta establi	nining aturation ation etlan priate Rese tion shed ards the n an	g and res l waterw policy to and left nds are periparian rve Manay Sdn Bho d are as for No Riv 1 > 4 2 20 3 10 4 5- 5 < 5 were displicitly field visit	ued to protect the storing appropriate rip vays. The estates ad maintain the buffer by undeveloped during riprotected including m buffer zones. The guidgement (Management di revised on 01/02/2010ws: Ver width 40 meters - 40 meters - 20 meters - 10 meters splayed accordingly at the stiffer zones identification.	parian buffer lopted the expressive restricting a replanting. We haintaining and elines are detected from the buffer zone buff	zones along kisting TDM grochemical ater courses and restoring stailed in the erve in TDM uffer zones	Complied			
			1 2	Estate Jaya Pg	Buffer Zones Water ways Sungai Jernih	Loca Interi Interi	nal				
		-	3	Emas Fikri	Sungai Kulai	Inter	nal				

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4	Pelung	Sungai Pelung / Sungai Kok	Internal
5	STPOM	Sunga iNerus (Source)	2 km

Samples are taken from the mill and estates for detection of any pollution arising from the mill and estates activities. Among others management plan taken:

- a) Regular inspection at buffer/HCV areas
- b) Monitor water from surrounding areas
- c) Track, measure and report all activities around river
- d) Train and educate workers

Water sampling was taken monthly and annually for the mill and estates, respectively. Among other parameters (random) as shown below: All units in mg/L except pH or otherwise stated.

	Water standa	rd anal	ysis STPOI	М	-	-
	Specification	Std	11/10/2 3	-	25/09/2 3	-
1	рН	6-9	0.7	-	8.2	-
2	BOD	100	10	-	20	-
3	Total S Solid	400	28	-	31	-
4	A Nitrogen	150	ND < 0.2	-	2.13	-
5	Total Nitrogen	200	ND <0.08	-	21.84	-

			T	1	Т		T		
		6	Oil & Grease	50	ND <1	-	ND<1	-	
		1	Vater sampling 1A/11B. Interin states. Results	n natior	nal water q				
			Estate		Jaya	Pg Emas	Fikri	Pelung	
			Date		15/08/2 3	09/08/2	16/07/2 3	02/08/2	
			Specification	Std	-	-	-	-	
		1	рН	6-9	6.0	6.9	7.2	6.6	
		2	BOD	3	<1	3	3	2	
		3	COD	25	<4	10	19	9	
		4	Total S Solid	50	<2	12	30	3	
		5	A Nitrogen	0.30	ND <0.2	ND<0.2	<nd(0. 2)</nd(0. 	ND<0.2	
		6	Phosphorus	0.2	<0.03	0.04	0.07	<0.03	
		The	alysis were ma ere were no iss						
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. - Minor compliance -	wit	e effluent treatr h operator in cordance with	charg	e revealed	d that th	e operati	ion was in	Complied
		requirements. No over flow was observed, and flow meter reading was recorded daily. The mill monitoring the effluent and submits to DOE through 'Borang Penyata Suku Tahunan.' The Mill DOE license							
		was							

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		mg/l. The results from final discharge were compliance within parameter limit. Jadual Pematuhan license no 004090 validity period of 01/7/23-30/6/24.								
			Pa	arameters	Std	12/04/	/23 10	/05/23	08/06/23	
		1	Pl	H	5.0-9.0	6.80	7.	10	7.40	
		2		OD	100	9.00		.00	15.00	
		3	_	OD	-	0.00	0.0		0.00	
		4		otal solids	-	0.00	0.0		0.00	
		5 6		Solids	400	22.00	28	.00	11.00	
		١١٥	О	il & grease	50	0.00	2.0	00	4.00	
		7	Α	Nitrogen	150	0.00	0.0	00	0.22	
		8		otal N	200	0.00	0.0	00	0.84	
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	wate	er r		in 2022				. The average e is no issue	
				Month	FFB proce	essed	Water/ L	Water/ B	FF	
					10643		32190	3.02		
					7152		26720	3.74		
				Mac	9868		35890	3.64		
					8026		28080	3.50		
					11862		30250	2.55		
					10772 12821		27450 32860	2.55		
				July Aug	21025		32860 44830	2.56		
					17744		45220	2.55		

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			Oct Nov Dec Total	14008 4 9349 2	13240 1390 19020 17540	2.74 2.95 3.10 2.80			
Criterio	n 7.9: Efficiency of fossil fuel use and the use of renewable energy is optin	nised							
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 -	plac Imp	A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2023. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:						
		No	Target	Objective	Action plan				
		1	Backhoe, tractor	fuel (diesel) consumption from company-owned vehicles and fue	engina idle ti	nsure the vehe is turn off du me cord vehicle act consume fuel	ring		
		2	Van / Supervisory vehicle	ivity nate hich					



The diesel utilization for the mill and estates is provided in the below table. Units in Diesel L/FFB mt. Total diesel in liters.

Mth	STPOM	Jaya	Pelung	Pg Emas	Fikri
Jan	0.50	0.87	4.32	5.20	3.00
Feb	1.01	0.80	7.12	5.07	3.13
Mac	0.95	0.81	12.42	4.87	3.41
April	0.88	0.71	8.14	2.92	3.25
May	0.46	0.65	9.41	2.72	3.03
Jun	0.86	0.68	11.37	2.38	3.53
July	0.62	0.87	12.97	3.18	2.77
Aug	0.27	0.77	9.75	2.84	3.50
Sept	0.92	0.77	5.01	2.55	4.61
Oct	0.87	1.04	6.28	2.48	3.97
Nov	1.04	1.20	12.51	2.22	2.39
Dec	1.36	0.59	2.81	3.45	3.57
Total	114882L	59650L	35000L	51729L	74125
B/line	0.77	11.14	8.27	3.32	3.35

The estate and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running.

Performance variation in view of several factors i.e.

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		e) Infrastructure of estates, f) Community size g) No. of vehicles / age of machine. h) Weather interference / crop production volume There is no opportunity for the estates to capitalize the utilization of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.	
	on 7.10: Plans to reduce pollution and emissions, including greenhouse gd to minimise GHG emissions.	ases (GHG), are developed, implemented and monitored and new de	evelopments are
7.10.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -	Sungai Tong Mill and Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation. a) The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adversely impact the environment. b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.	Complied
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -	No development within Sungai Tong POM and Supply Base since 2014.	Complied
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	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	Complied

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- Critical (Major) compliance -	acti (SM acti Imp and Am	environmental aspects/impacts register associated with activities. Environmental aspect and impact (EIA) record (SM/5.2/EIA) and (SM/5.2/EIE) which covers estates an activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste proposed and sources of pollution, was in place and is reviewed accord Among others the significant environmental receptors for estates and mill operations were:							
			vehicle & gene	-from boiler stack (sm erator (smoke and gas ic processes (ETP, EFB	ses). GHG emissio				
	2	. Water	Water discha station w condensate/cl	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down					
	3	3 land Land – Scheduled waste, domestic waste and indust / process waste. Clinical wastes – generated for clinics.							
	boil with	Sungai Tong Palm Oil Mill conducted boiler stack sampling for 1 boiler stack by Environmental Science (M) Sdn Bhd. Results were within the acceptable limit. Air Monitoring							
				ampling was carried or was conducted or					
		Boiler no	Date	Dust concentration	EQA std				



	TG PMD 424 15/05/23 98.80 mg/m3 150 mg/m3
	TG PMD 424 27/02/23 86.00 mg/m3 150 mg/m3
	The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS was found to be in functional condition. Data from the stack is connected online to DOE's office. Boiler smoke emission data are within the DOE limit.
	An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent.
	'Pollution prevention plan and waste management action plan" is used to identify the waste products and sources of pollution — is in place and is being reviewed and implemented accordingly. Among of action has been taken by CU were:
	 a) Scheduled wastes – were disposed to Southern Medi One Sdn Bhd located in Pasir Gudang Johor. (SW404)and others to Pentas Flora (Kelantan) Sdn Bhd. Domestic waste .are disposed at Majlis Daerah Setiu landfill for all the audited estates with exception for Pinang Emas Estate having an internal P99/A2 landfill. b) Full compliance to zero burning practices.
Criterion 7.11: Fire is not used for preparing land and is prevented in the ma	
, ,	•

7.11.1	(C) Land for new planting or replanting is not prepared by burning Critical (Major) compliance -	No		states by	burning e	ver since TI		nting in TDM on practiced	Complied
			a) Unde b) Envir						
		pro the win ha wa							
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 -	a) b) c) d)	Objectiv Activity Function Emerger	e and preve of Fire and ncy Evacua	ntion. nd Rescue ation Plan	/ Drill			Complied
		The procedure was formalized by Sustainability & Risk Unit for use in all operating units in TDM Estates and mills. Training related to fire drill /prevention were held respectively all estates and mill. Among others the related session as shown below;							
			Subject	Jaya	Pelung	STPOM	Pg Emas	Fikri	
		1	MSPO/ RSPO	20/3/23	09/4/23	10/10/23	13.06/23	06/2/23	
		2	First Aid /ERP	20/6/23	26/7/23	-	10/10/23	04/9/23	

1								,	
		3	Fire Drill	08/8/23	27/9/23	13/9/23	22/3/23	24/10/23	
		4	Zero Burning	-	17/7/23	04/6/23	-	-	
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	the sta pro 10,	th the esta e adjacen keholders ocedure K 10/2023 esented. Tl	Complied					
		a) b) c) d)							
		The 17, out Da 202							
	n 7.12: Land clearing does not cause deforestation or damage any area rest. HCVs and HCS forests in the managed area are identified and protected				hance Hig	h Conserva	ation Values	(HCVs) or Hig	gh Carbon Stock
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.							imary forest.	Complied

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 -		
7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows: a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid. b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations. PROCEDURAL NOTE: 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 -	c) Finding and discussion - landscape context - HCV criteria and application to agriculture d) HCV monitoring and management	Complied

7.12.3	Indicator is not applicable in Malaysia context	NA NA	Not Applicable
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -	No RTE being identified as per in HCV Re-Assessment for North Zone Estates on Dec 2022 by performed by Green Orbis Environmental Sdn Bhd. The estates have established and documented HCV area/Biodiversity management Plan. This being established during the management meetings / discussion, stakeholder meeting (recent dated 17/10/2023 with 23 attendees), EPMC, dialogue with workers during muster and audits. Generally among the plans established were: a) maintaining signage b) continue to record HCV monitoring such as wildlife sighting, encroachment and illegal hunting c) enhancing HCV awareness among employees. The estates continued to train the workers on HCV and RTE Species. Signage on prohibition of illegal hunting or fishing, no swimming and chemical application at buffer zone area were erected at the HCV area. Noted during site visit, all the signage was well maintained.	Complied
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -	There was no rights of local communities been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas. The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird, presence of wild boar, elephants and monkeys occasionally sighted. The appropriate measures that are expected	Complied

7.12.6	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	Th wa	maintain and/or tion plan reviewed ne management as established a gnage made at si a) No fishing, b) no spraying	and moni and reviev ite i.e.	toring played annu	an for HCV ally. There	/Biodiversi	ty areas	Complied	
	for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -	In We	nere were progretaining to the eterview with the ere made during so emphasized mployees are awa a) An offence b) Disciplinary company r c) Riparian bapplication d) Relevant se) Among oth	awarenee employee the ad-ho during the are of the eto captury measurules. Duffer zon pollution igns NO H	ess of Hoses concluded session of the training following re, harm, res shall the to be supported to be support	CV areas added that train and morning held by reminders, kills any will be taken The free from the free from the taken are the free from the taken are the free from the free free from the free from the free free from the free free from the free free from the free free free from the free free from the free free from the free free free free free free free fr	and RTE aining and ing muster the esta ; Idlife. if found v m any ch	species. briefing This is tes/mill.		
			Subject	Jaya	Pelung	STPOM	Pg Emas	Fikri		
		1	Protection buffer zone	24/9/23	29/3/23	-	03/11/22	22/3/23		
		2	HCV	12/9/23	04/9/23	-	28/3/23	08/3/23		
		3	Policy Briefing	14/6/23	18/4/23	10/10/23	06/06/23	27/2/23		
		4	MSPO/RSPO		09/4/23	10/10/23	13.06/23	06/2/23		



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 -	Educational activities on RTE species were made through few means such as briefings/training and no hunting signage. Interview with workers showed that they have a good understanding in the restriction of capturing the RTE species. There also record of HCV monitoring sampling in all the estates assessed. Monitoring for all the HCV identified being monitored on monthly basis. RTE monitoring are also being made with feedback made to the management on any sightings.	Complied
7.12.8	(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. - Critical (Major) compliance -	There are no land clearing since without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within the TDM North Zone Estates complex.	Complied



Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for **Sungai Tong Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2022** for **Sungai Tong Palm Oil Mill** and supply base are as following:

Emission per product	tCO₂e/tProduct
СРО	1.01
PKO	1.01

Extraction	%
OER	18.6
KER	4.49

Production	t/yr
FFB Process	148,878.13
CPO Produced	28,143.30
PKO Produced	6,684.63

Land Use	На
OP Planted Area	16,810.82
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	0.00
Tota	16,810.82

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO₂e / FFB
Emission								
Land Conversion	93,047.01	0.89	0.00	0.00	0.00	0.00	93,047.01	
CO ₂ Emission from fertilizer	5,570.25	0.05	0.00	0.00	0.00	0.00	5,570.26	
NO ₂ Emission	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Fuel Consumption	897.98	0.01	0.00	0.00	0.00	0.00	897.98	
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Sink								
Crop Sequestration	-76,141.07	-0.73	0.00	0.00	0.00	0.00	-76,141.07	
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Total	23,374.18	0.22	0.00	0.00	3,692.88	0.00	33,067.06	

*Note: Includes both estates and smallholders



Summary of Mill Emission and Credit

	tCO₂e	tCO₂e/tFFB
Emission		·
POME	1,258.31	0.01
Fuel Consumption	358.43	0.00
Grid Electricity Utilization 0.00		0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	1,616.74	0.01

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

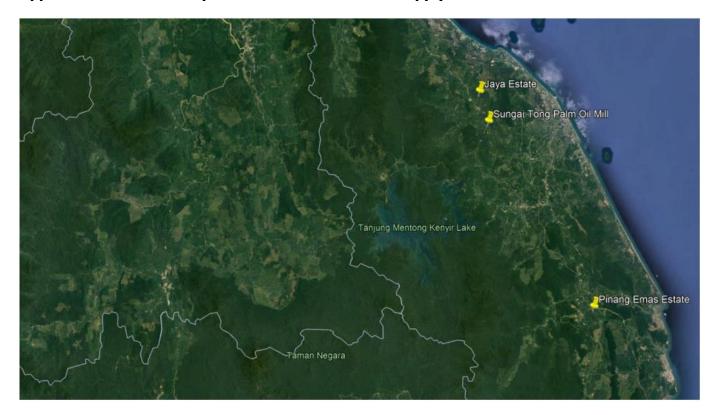
^{*}This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:		
Divert to Compost (%) 90		
Divert to anaerobic diversion (%) 10		

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



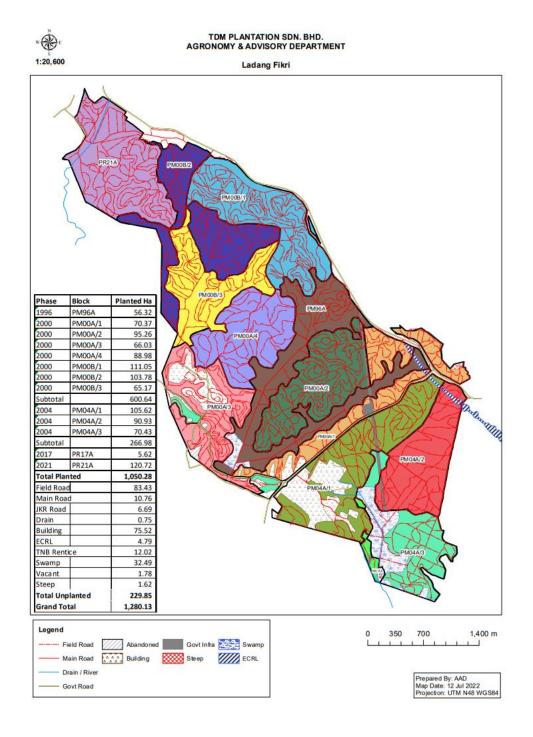
Appendix C: Location Map of Certification Unit and Supply bases





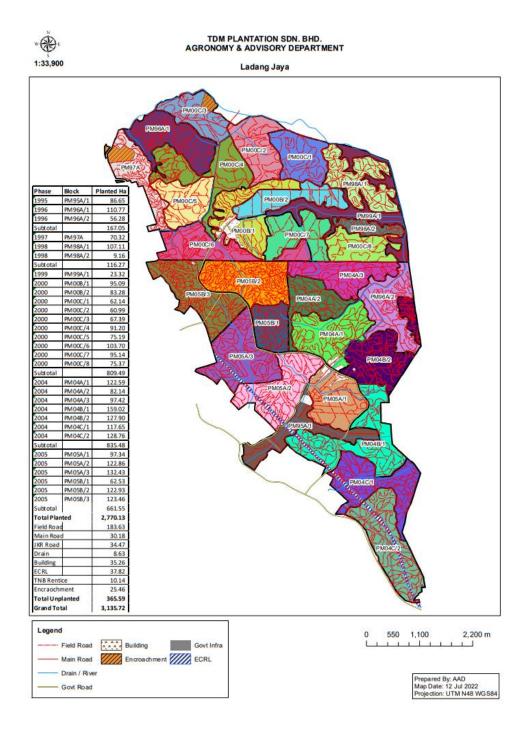
Appendix D: Estate Field Map

Fikri Estate



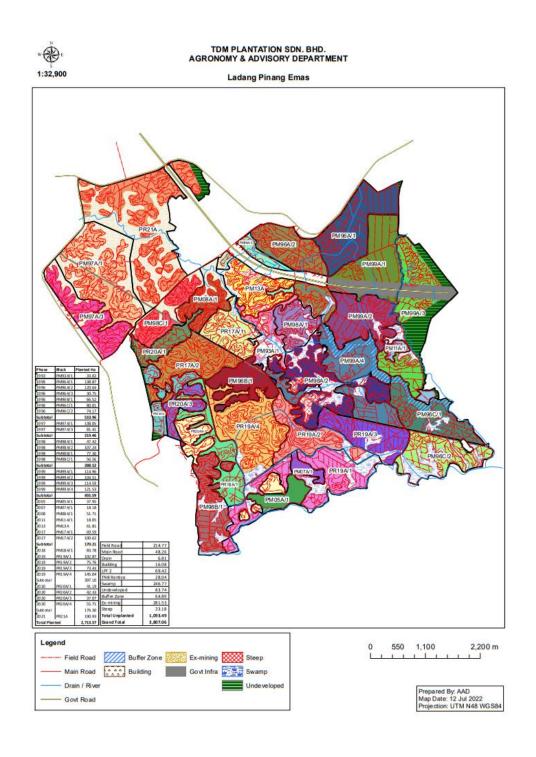


Jaya Estate



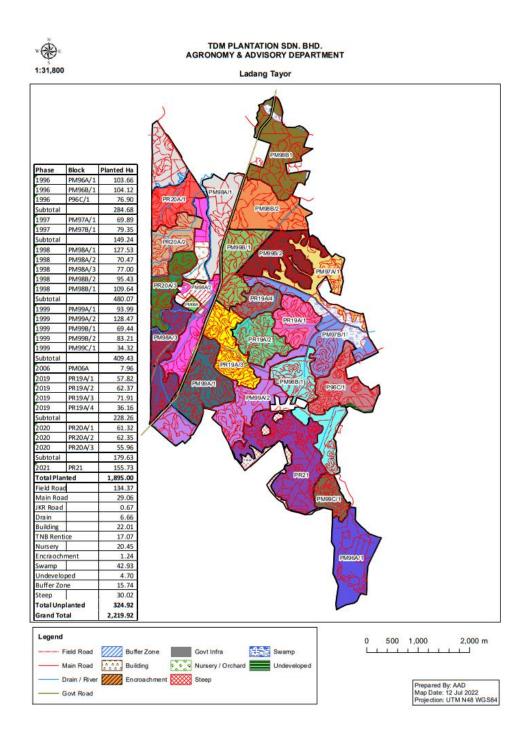


Pinang Emas Estate



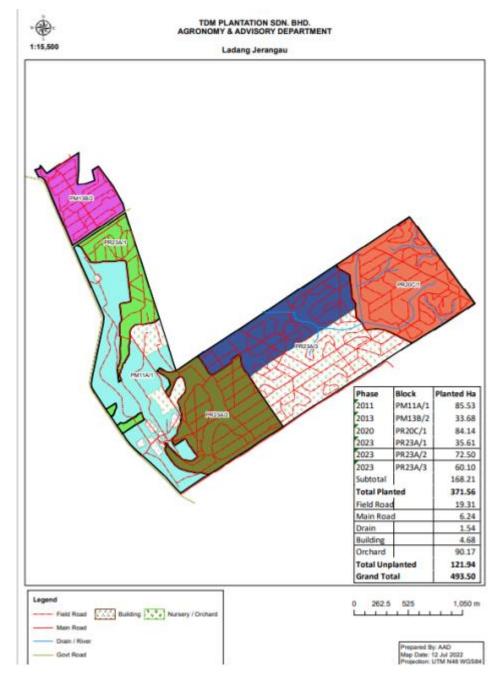


Tayor Estate



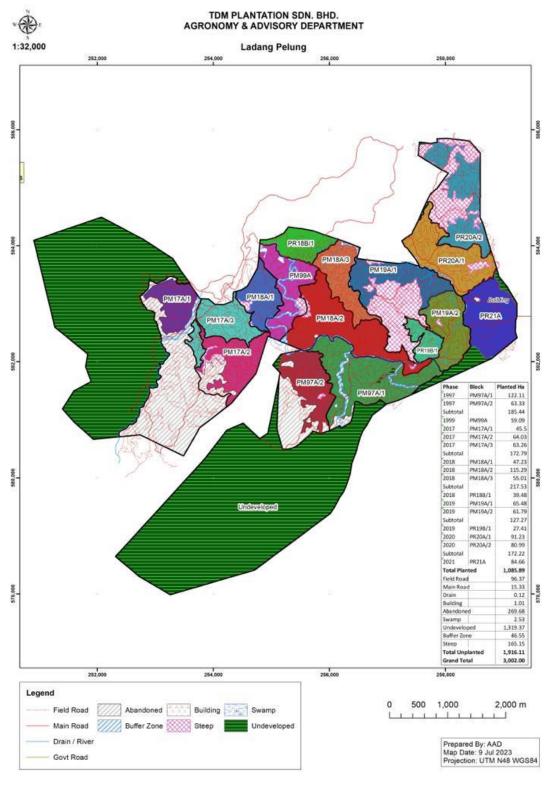


Jerengau Estate





Pelung Estate





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		•		Forecasted annual FFB	joining	Smallholder ID		
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area	Production (MT)			
Not Applicable										
Total										
Note	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