

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (2\_3)
- Recertification Assessment (Choose an item.)
- Extension of Scope

<b>Client Company Name / Parent Company:</b> <b>SD GUTHRIE BERHAD</b>
Client Company / Parent Company Address: Level 11, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia
Certification Unit: <b>Strategic Operating Unit (SOU 22) – Bukit Benut Palm Oil Mill</b> Location of Certification Unit: KM 12, Jalan Mengkibol, 86009 Kluang, Johor, Malaysia
Date of Final Report: 24/09/2024

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### Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	SD Guthrie Berhad		
<b>RSPO Membership Number</b>	1-0008-04-000-00	<b>Membership Approval Date</b>	07/09/2004
<b>Address</b>	Level 11, Main Block, Plantation Tower No.2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia.		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Strategic Operating Unit (SOU 22) – Bukit Benut Palm Oil Mill		
<b>Location / Address</b>	KM 12, Jalan Mengkibol, Kluang, 86009 Johor, Malaysia		
<b>Website</b>	<a href="http://www.sdguthrie.com">www.sdguthrie.com</a>		
<b>Management Representative</b>	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, GSD) Mr. Anuar bin Zakaria (Mill Manager)	<b>E-mail</b>	<a href="mailto:shylaja.vasudevan@sdguthrie.com">shylaja.vasudevan@sdguthrie.com</a>  <a href="mailto:kks.bk.benut@sdguthrie.com">kks.bk.benut@sdguthrie.com</a>
<b>Telephone</b>	+(603) 78484000 (HQ) +6013-2086959 (Mill)	<b>Facsimile</b>	+607-7766479 (Mill)

2. Certification Information			
<b>Certificate Number</b>	RSPO 591229	<b>Certificate Start Date</b>	05/10/2021
<b>Date of First Certification</b>	05/10/2011	<b>Certificate Expiry Date</b>	04/10/2026
<b>Scope of Certification</b>	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
<b>Visit Objectives</b>	<ul style="list-style-type: none"> <li>Determination of the conformity of the client's management system, or parts of it, with audit criteria.</li> <li>Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements</li> </ul>		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_3) <input type="checkbox"/> Recertification Assessment (RA 1) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards / Normative Reference</b>	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 of the RSPO P&C 2018		
<b>Supply Chain Module</b>	<input checked="" type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	20 mt/hr

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<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
<b>Is this a remote audit or on-site audit</b>	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 686845	MS 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn Bhd	17/12/2027
MSPO 682040	MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		17/12/2027
MSPO 714131	MSPO Supply Chain Certification Standard 2018		17/09/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Bukit Benut Palm Oil Mill	KM 12, Jalan Mengkibol, 86009 Kluang, Johor	1° 55' 50.64" N	103° 20' 50.71" E
Bukit Benut Estate	KM 12, Jalan Mengkibol, 86009 Kluang, Johor	1° 54' 40.70" N	103° 19' 58.80" E
Lambak Elaeis Estate	Ladang Lambak/Elais 86009 Kluang, Johor	1° 58' 01.13" N	103° 19' 35.58" E

5. Description of Supply Base					
<b>New Planting Development</b>	<input checked="" type="checkbox"/> No		<input type="checkbox"/> Yes		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Benut Estate	2,536.70	24.18	238.90	2,799.78	90.60
Lambak Elaeis Estate	3,344.46	2.65	393.05	3,740.16	89.42
<b>Total</b>	<b>5,881.16</b>	<b>26.83</b>	<b>631.95</b>	<b>6,539.94</b>	

**Note**  
Reduce of total planted and additional for infrastructure due to GIS survey that has been conducted. Total land area maintained with total 6,539.94 Ha

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<b>6. Plantings &amp; Cycle</b>						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Bukit Benut Estate	182.29	1,228.20	964.59	161.62	2,354.41	182.29
Lambak Elaeis Estate	387.22	1,507.07	1,450.17	0	2,957.24	387.22
<b>Total (ha)</b>	<b>569.51</b>	<b>2735.3</b>	<b>2414.8</b>	<b>161.62</b>	<b>5,311.65</b>	<b>569.51</b>

<b>7. Summary of Certified Tonnage of FFB (Own Certified Scope)</b>						
Estate / Smallholders	Tonnage (MT) / year					
	Estimated last year (Oct'23 – Sept'24)	Actual (Jul'23 – June'24)		Forecast (Oct'24 – Sept'25)		
		Previous license period (Jul 2023 – Sept 2023)	Current license period (Oct 2023 – June 2024)			
Bukit Benut Estate	43,589.50	9,430.85	27,391.37	59,150.27		
Lambak Elaeis Estate	51,735.50	14,213.93	39,521.92	42,655.73		
<b>Total</b>	<b>IP</b>	<b>95,324.00</b>	<b>IP</b>	<b>90,558.07</b>	<b>IP</b>	<b>101,805.00</b>
	<b>MB</b>	<b>1.00</b>	<b>MB</b>	<b>0.00</b>	<b>MB</b>	<b>1.00</b>

<b>8. Summary of Certified Tonnage of FFB (from other certified unit(s))</b>						
Estate / Smallholders	Tonnage (MT) / year					
	Estimated last year (Oct'23 – Sept'24)	Actual (Jul'23 – June'24)		Forecast (Oct'24 – Sept'25)		
		Previous license period (Jul 2023 – Sept 2023)	Current license period (Oct 2023 – June 2024)			
Cenas Estate		2302.86	3901.78			
Tun Dr. Ismail Estate		-	214.87			
<b>Total</b>		<b>6,419.51</b>				

**Note**

Both estates is from certified units under SD Guthrie Berhad which is SOU 23- Ulu Remis POM

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<b>9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
<b>Out growers / smallholders</b>	<b>Tonnage (MT) / year</b>			
	<b>Estimated last year (Oct'23 – Sept'24)</b>	<b>Actual (Jul'23 – June'24)</b>		<b>Forecast (Oct'24 – Sept'25)</b>
		<b>Previous license period (Jul 2023 – Sept 2023)</b>	<b>Current license period (Oct 2023 – June 2024)</b>	
NA	NA	NA	NA	NA
<b>Total</b>	NA	NA		NA

<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply base (mt)</b>	<b>Volume of FFB from uncertified supply base (mt)</b>	<b>Total FFB/Month (mt)</b>
1	July 2023	8386.75	-	8386.75
2	August 2023	8840.86	-	8840.86
3	September 2023	8720.03	-	8720.03
4	October 2023	9983.86	-	9983.86
5	November 2023	9057.54	-	9057.54
6	December 2023	8776.22	-	8776.22
7	January 2024	6634.38	-	6634.38
8	February 2024	5711.85	-	5711.85
9	March 2024	4147.62	-	4147.62
10	April 2024	7525.84	-	7525.84
11	May 2024	10882.11	-	10882.11
12	June 2024	8310.52	-	8310.52
<b>TOTAL</b>		<b>96,977.58</b>	<b>-</b>	<b>96,977.58</b>

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<b>10. Summary of Certified Tonnage (MT) (not applicable for ISS)</b>							
<b>Estimated last year (Oct'23 – Sept'24)</b>		<b>Actual (Jul'23 – June'24)</b>				<b>Forecast (Oct'24 – Sept'25)</b>	
		Previous license period (Jul 2023 – Sept 2023)		Current license period (Oct 2023 – June 2024)			
<b>FFB</b>		<b>FFB</b>				<b>FFB</b>	
IP	116,224.00	IP	25,947.64	IP	71,029.94	IP	101,805.00
		MB	0.00	MB	0.00		
MB	2.00	<b>TOTAL</b>		<b>IP</b>	<b>96,997.58</b>	MB	1.00
				<b>MB</b>	<b>0.00</b>		
<b>CPO (OER: 20.70%)</b>		<b>CPO (OER: 20.77 %)</b>				<b>CPO (OER: 21.00 %)</b>	
IP	24,120.28	IP	5,146.17	IP	14,996.30	IP	21,378.26
		MB	0.00	MB	0.00		
MB	2.00	<b>TOTAL</b>		<b>IP</b>	<b>20,142.47</b>	MB	1.00
				<b>MB</b>	<b>0.00</b>		
<b>PK (KER: 5.18 %)</b>		<b>PK (KER:4.51%)</b>				<b>PK (KER: 5.05%)</b>	
IP	5,876.84	IP	1,243.45	IP	3,131.84	IP	5,140.00
		MB	0.00	MB	0.00		
MB	2.00	<b>TOTAL</b>		<b>IP</b>	<b>4,375.29</b>	MB	1.00
				<b>MB</b>	<b>0.00</b>		
<b>Note(s):</b>							
* Volume extension approved on 22/07/2024							
CSPO: 19,731.28 mt (IP) + 4,389.00 mt (IP vol. ext) + 1mt (MB) + 1 mt (MB vol. ext)= 24,122.28 mt							
CSPK: 4,936.84 mt (IP) + 940.00 mt (IP vol. ext.) + 1 mt (MB) +1 mt (MB vol. ext) = 5,878.84 mt							
FFB: 95,324.00 mt (IP) + 20,900.00 mt (IP vol. ext.) + 1 mt (MB) + 1 mt (MB vol.ext.)= 116,226.00 mt							
The estimated volume of 1 metric ton (MT) for each MB (Mass Balance) product is intended for PalmTrace data entry despite no actual MB volume processed.							

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<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (MT)</b>	<b>Certified PK (MT)</b>
1	July 2023	1605.67	388.35
2	August 2023	1787.67	427.55
3	September 2023	1752.83	427.55
4	October 2023	2038.08	418.46
5	November 2023	1956.22	442.70
6	December 2023	1854.11	415.56
7	January 2024	1364.45	294.88
8	February 2024	1364.65	248.75
9	March 2024	865.95	169.47
10	April 2024	1570.62	361.30
11	May 2024	2233.31	430.54
12	June 2024	1748.91	350.18
<b>TOTAL</b>		<b>20,142.47</b>	<b>4,375.29</b>

<b>11. Summary of Actual Volume sold</b>					
<b>Current License period (Oct 2023 – June 2024)</b>					
	<b>RSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>Others</b>		
<b>CPO (MT)</b>	4,148.89	-	-	8,837.55	12,986.44
<b>PK (MT)</b>	2,791.73	-	-	-	2,791.00
<b>Credits</b>	-	-	-	-	-
<b>Previous License period (Jul 2023 – Sept 2023)</b>					
<b>CPO (MT)</b>	1,080.85	-	-	4,065.30	5,146.15
<b>PK (MT)</b>	931.49	-	-	460.28	1,391.77
<b>Credits</b>	-	-	-	-	-
<b>Note:</b>					
1. Conventional is RSPO certified material but sold as non-RSPO.					
2. As the period, there is no Certified CPO and PK sold as MB					



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<b>10A. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Palmtrace Trading License Number</b>	<b>Certified CPO Sold (mt)</b>	<b>Certified PK Sold (mt)</b>
1	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-51bb50ba-75d6	-	267.57
2	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-f4e31c2a-17f8	-	5.47
3	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-0b77188a-7fa9	-	94.53
4	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-88c70ba4-5552	-	200
5	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-e095c3cb-c96d	-	123.55
6	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-b1f69f53-6253	-	26.45
7	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-59938e08-efcf	-	100
8	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-62486f09-a1ef	-	200
9	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-917dec4f-a095	-	12.43
10	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-4d41065c-30ba	-	87.57
11	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-bca7faac-55e7	-	61.03
12	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-eca07502-8167	-	188.97
13	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-d89076f7-04c6	-	86.8
14	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-fbbc27d7-494c	-	213.2
15	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-2c605482-9028	-	29.03
16	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-2ca354a9-dd36	-	50
17	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-e3059a49-e2cb	-	70.97
18	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-a15bf887-f290	-	200
19	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-8165fb36-3ad6	-	255.16

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20	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-80871da3-821a	-	19
21	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-dff7ee12-5b77	-	100
22	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-cd215688-9e5b	-	200
23	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-60ddbd49-05c4	-	133.21
24	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-4e532db4-f8ed	-	66.79
25	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-85d10841-fe71	-	250
26	Sxxx Dxxxx Oxxx Cxxxxx Ixxxxx KCP Sdn. Bhd.	TR-c7243643-472a	-	75.13
27	SD Gxxxxx Ixxxxxxx Cxxxx Ixxxxx KCP Sdn Bhd	TR-7e25fd96-b909	-	224.87
28	SD Gxxxxx Ixxxxxxx Cxxxx Ixxxxx KCP Sdn Bhd	TR-19a090c8-f405	-	80
29	SD Gxxxxx Ixxxxxxx Cxxxx Ixxxxx KCP Sdn Bhd	TR-c6c059a3-17aa	-	224.35
30	SD Gxxxxx Ixxxxxxx Cxxxx Ixxxxx KCP Sdn Bhd	TR-d7c85f0e-5da9	-	50
31	SD Gxxxxx Ixxxxxxx Cxxxx Ixxxxx KCP Sdn Bhd	TR-3f3e5b8a-871a	-	27.14
32	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-fa9d2071-ca6a	318.06	-
33	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-a00e297b-d97c	117.45	-
34	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-d28eecbe-db99	118.56	-
35	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-4976f0c8-3175	77.68	-
36	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-bb7da40a-f1ae	41.07	-
37	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-38373c8b-b521	158.93	-
38	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-d6904534-2041	158.34	-
39	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-ec05c278-e996	48.64	-

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40	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-3f5399c4-b641	30.94	-
41	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-878375c1-c3e1	38.57	-
42	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-9d1b9ee7-8ed1	79.1	-
43	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-442e0caa-e22b	113.42	-
44	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-88a8f38b-0fcc	40.57	-
45	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-22cd1676-e330	17.07	-
46	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-40c8fdd8-cc16	101.18	-
47	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-ffb18d89-0e6f	75	-
48	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-1b375043-e384	94.17	-
49	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-bba4db6f-f281	200	-
50	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-32e27c55-0b19	7.63	-
51	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-2e62f830-63b4	38.29	-
52	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-45bc37ad-9ea1	23.82	-
53	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-05c8efbf-01eb	56.25	-
54	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-24d4ca03-9a27	143.75	-
55	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-b2e835fd-dee5	14.74	-
56	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-e864cc5b-2ed2	79.19	-
57	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-bca597c2-2149	106.07	-
58	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-97d86893-9f13	47.99	-
59	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-5478495f-93cb	116.55	-

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60	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-e67da067-e018	35.46	-
61	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-55eebf1c-6151	81.89	-
62	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-84305af1-496a	118.11	-
63	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-0694b35e-bc4d	38.74	-
64	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-cbb75853-3e2a	50.8	-
65	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-aa4f19be-a399	27.99	-
66	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-fc380764-bcf9	78.72	-
67	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-1c57f21b-578c	78.54	-
68	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-0dfc5d1c-6ff0	64.75	-
69	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-ae23f59e-a48e	14.99	-
70	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-2469f96f-4507	29.55	-
71	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-be4d9ae3-b0e7	14.49	-
72	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-fb8c0b73-0572	71.87	-
73	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-4a7458be-46ac	116.71	-
74	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-0e90162e-c2c0	80.46	-
75	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-7cde7599-3c5f	39.48	-
76	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-bd0ac440-41c1	79.07	-
77	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-dec4b4eb-9b30	39.34	-
78	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-39cd693c-7f1c	97.28	-
79	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-130390aa-7524	20.24	-

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80	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-1fdd1d99-5cf2	84.95	-
81	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-e209c859-dd32	32.72	-
82	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-c8f05012-e21e	39.85	-
83	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-7a7d2598-a1d6	78.2	-
84	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-ac352487-7d99	77.63	-
85	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-ae89c57e-ddbc	77.32	-
86	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-eb780306-b9f7	37.49	-
87	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-af4c98f9-8aa3	79.22	-
88	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-8f05793c-fbdb	46.39	-
89	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-69c2064d-9bd7	156.5	-
90	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-461e8409-a485	197.56	-
91	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-3f12cdbc-0647	200	-
92	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-fd5cbcd0-1e3f	200	-
93	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-fca9bb68-f0fb	200	-
94	Sxxx Dxxxx Oxxx Cxxxxxxxxx SDN BHD	TR-7d35aa64-0642	80.4	-
<b>TOTAL</b>			<b>5,229.74</b>	<b>3,723.22</b>

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

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<b>11C. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	SDO Port Klang	6,423.55	-
2	Pxxx Kxxxxx Installation (PKI)	1, 673.69	-
3	SIxxx	699.60	-
4	Mxxxx Oil	781.89	-
5	Mxxxx	2, 040.00	-
6	Mxxxx Wxxx Pxxx	622.83	-
7	Paxxxx Oil	661.29	-
8	Pxxxxx Vxxxxx Oil	-	301.49
9	Pxxx	-	158.79
<b>TOTAL</b>		<b>12,902.85</b>	<b>460.28</b>

<b>11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)</b>			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
NA	NA	NA	NA
<b>TOTAL</b>			<b>NA</b>

<b>12. Independent Smallholders Certified Tonnage (MT) / Volume</b>									
Phase	Estimated last year (Oct'23 – Sept'24)			Actual (Jul'23 – June'24)			Forecast (Oct'24 – Sept'25)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

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

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPPO	CSPK	IS-CSPKO	IS-CSPKE
<b>Current License period (Oct 2023 – June 2024)</b>							
<b>Credits</b>				N/A	N/A	N/A	N/A
<b>Physical</b>	N/A	N/A	N/A				
<b>Previous License period (Jul 2023 – Sept 2023)</b>							
<b>Credits</b>				N/A	N/A	N/A	N/A
<b>Physical</b>	N/A	N/A	N/A				

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

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)  
Suite 29.01 Level 29, The Gardens North Tower,  
Mid Valley City, Lingkaran Syed Putra,  
59200 Kuala Lumpur, Malaysia.  
Tel +60 (3) 9212 9638; Fax +60 (3) 9212 9639  
Representative: Dr. Chaiyaporn Seekao ([Chaiyaporn.Seekao@bsigroup.com](mailto:Chaiyaporn.Seekao@bsigroup.com))  
Website: [www.bsigroup.com](http://www.bsigroup.com)

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

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **09-12/07/2024**. The audit programme is included as Section 2.3.

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

The Critical NC close out off-site assessment was conducted on **11/09/2024**. The audit programs are included in Section 2.3.

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

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

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

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

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



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

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

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Re-Certification)</b>	<b>Year 2 (ASA2-1)</b>	<b>Year 3 (ASA2-2)</b>	<b>Year 4 (ASA2-3)</b>	<b>Year 5 (ASA2-4)</b>
Bukit Benut Palm Oil Mill	√	√	√	√	√
Bukit Benut Estate	√	√	√	√	√
Lambak Elaeis Estate	√	√	√	√	√

**Tentative Date of Next Visit: July 8, 2025 – July 11, 2025**

**Total Number of Man-days: 9.50 Man-days**

**2.2 BSI Assessment Team**

<b>Name</b>	<b>Role</b>	<b>Competency</b>
Mohd Razaleigh bin Mohamad (MRM)	Team Leader	<p><b>Education:</b> He graduated Bachelor (Scs.) Plantations Management and Agrotechnology from Universiti Teknologi Mara (UiTM) in 2012.</p> <p><b>Work Experience:</b> He gained his working exposure in the plantations sector, serving as Senior Assistant Manager with Tradewinds Plantations Berhad from 2012 until 2017 and has been doing audit for RSPO P&amp;C, MSPO, since 2017 until now.</p> <p><b>Training attended:</b> He has successfully completed ISO 9001:2015 (2020), ISO 14001:2015 (2017), ISO 45001:2018 (2021), Endorsed RSPO P&amp;C Lead Auditor Course (2018), Endorsed MSPO P&amp;C Lead Auditor Course (2017), Social Accountability SA8000 (2019), Endorsed RSPO Independent Smallholder (IHS), (2022).</p> <p><b>Language proficiency:</b> Fluent in in both verbal/written Bahasa Malaysia and English Language</p> <p><b>Aspect covered in this audit:</b>  <input checked="" type="checkbox"/> Good Agriculture Practice             <input checked="" type="checkbox"/> Health and Safety             <input checked="" type="checkbox"/> Supply chain requirements  <input type="checkbox"/> Social             <input type="checkbox"/> Environmental             <input checked="" type="checkbox"/> Market Communication and claim requirements  <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>

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<p>Nor Halis Abu Zar (NHA)</p>	<p>Team Member</p>	<p><b>Education:</b> Bachelor of Science, Plantation Technology and Management, graduated from UiTM in 2012 and Diploma In Plantation and Industry Management from UiTM in 2009.</p> <p><b>Work Experience:</b> He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day-to-day plantation operations. In his career at Kulim Plantation. He had accumulated more than 6 years of sustainability implementation experience. He is a qualified Lead Auditor for MS2530:2013 and RSPO Auditor for ENV and OSH and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p><b>Training attended:</b> He has completed RSPO P&amp;C Lead Auditor Course in Oct 2020, Refresher RSPO P&amp;C Lead Auditor Course in May 2022, RSPO ISH Standard 2019 in December 2021, RSPO SCC 2020 in September 2022, QMS 9001:2015 Lead Auditor Course in April 2019, OSH 45001:2018 Lead Auditor Course in June 2021, IMS (ISO 9001:2015 &amp; ISO 14001:2015) Lead Auditor Course, HCV &amp; HCS Training in August 2022, MSPO 2530:2013 Lead Auditor Course in February 2019, MSPO SCCS Auditor in February 2019, SMETA Requirement Training on May 2021, ISH Training by RSPO in 2023 and ILO Training on March 2024.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Malaysia and English Language</p> <p><b>Aspect covered in this audit:</b> <input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
<p>Zulkifli Kamarol Zaman (ZKZ)</p>	<p>Team member</p>	<p><b>Education:</b> He graduated in Bachelor of Science (Agribusiness) from University Putra Malaysia (UPM) in 2008.</p> <p><b>Work Experience:</b> He has 10 years' experience in oil palm industry whereas he has been working at plantation company as Estate Assistant Manager prior to joining Certification Body as an Auditor. He is familiar with the estate's daily operation as well as the Best Management Practices for oil palm cultivation. Prior to joining BSI, he was the auditor for several certification bodies. He is involved in auditing MSPO OPMC, MSPO SCCS, RSPO P&amp;C, RSPO SCCS and PEFC CoC standard.</p> <p><b>Training attended:</b> He has completed ISO IMS 9001, 14001, 45001 Lead Auditor Course in April 2018, Endorsed MSPO OPMC Lead Auditor Course in April 2019, Endorsed</p>

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		<p>MSPO SCCS Auditor Course in September 2019, Endorsed RSPO P&amp;C Lead Auditor Course in March 2020, Endorsed RSPO SCCS Lead Auditor Course in March 2020, PEFC Chain of Custody Training in December 2020, ISO 9001:2015 Lead Auditor Course in October 2023, ISO 45001:2018 Lead Auditor Course in November 2023 and SA8000 Introduction &amp; Basic Auditor Training Course in November 2023.</p> <p><b>Language proficiency:</b></p> <p>He is fluent in English and Bahasa Malaysia.</p> <p><b>Aspect covered in this audit:</b></p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements  <input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements  <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
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**Accompanying Persons:**

Name	Role
Not applicable	

**2.3 Assessment Plan**

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

Date	Time	Subjects	MRM	ZKZ	NHAZ
Monday, 08/07/2024	-	Audit Team Travel from Kuala Lumpur to Kluang	√	√	√
Tuesday 09/07/2024 Lambak Elaeis Estate	08.30 – 09.00	<p>Opening Meeting:</p> <ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader.</li> <li>Confirmation of assessment scope and finalize Audit plan</li> </ul>	√	√	√
	09.00 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	12.30 – 13.30	Lunch/ Break	√	√	√
	13.30 – 16.30	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√

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Date	Time	Subjects	MRM	ZKZ	NHAZ
	16.30 – 17.00	Interim Closing briefing.	√	√	√
Wednesday 10/07/2024 Bukit Benut Estate	09.00 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	10.00 – 12.00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)		√	
	12.30 – 13.30	Lunch/ Break	√	√	√
	13.30 – 16.30	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	16.30 – 17.00	Interim Closing briefing.	√	√	√
Thursday 11/07/2024 Bukit Benut POM	09.00 – 12.30	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	√	√	√
	12.30 – 13.30	Lunch/ Break	√	√	√
	13.30 – 16.30	Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc). RSPO Supply chain requirements for mill	√	√	√
	16.30 – 17.00	Interim Closing briefing.	√	√	√
Friday 12/07/2024 Bukit Benut POM	09.00 – 12.00	RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting, Market Communication and Claim requirements and other relevant documents and records.	√	-	-

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Date	Time	Subjects	MRM	ZKZ	NHAZ
	12.00 – 12.15	Audit Team Discussion and report preparation	√	√	√
	12.15 – 13.00	Closing Meeting	√	√	√
	-	Audit Team Travel back to Kuala Lumpur	√	√	-

**Major Non-conformity closure plan**

Date	Time	Subjects	MRM
Wednesday, 11/09/2024	9:00 AM – 9:30 AM	<p>Opening meeting</p> <ul style="list-style-type: none"> <li>• Opening presentation by audit team leader</li> <li>• Confirmation of assessment scope and finalize audit plan</li> </ul> <p>Meeting Link:  <a href="https://teams.microsoft.com/l/meetup-join/19%3ameeting_Y2FjYjMwMmMtODU5NC00NjNjLWEyNWItMGE1ZGZlODk4ZmZi%40thread.v2/0?context=%7b%22Tid%22%3a%2254946ffc-68d3-4955-ac70-dca726d445b4%22%2c%22Oid%22%3a%2239bd50f0-aab5-446b-9742-eb9e121c4f38%22%7d">https://teams.microsoft.com/l/meetup-join/19%3ameeting_Y2FjYjMwMmMtODU5NC00NjNjLWEyNWItMGE1ZGZlODk4ZmZi%40thread.v2/0?context=%7b%22Tid%22%3a%2254946ffc-68d3-4955-ac70-dca726d445b4%22%2c%22Oid%22%3a%2239bd50f0-aab5-446b-9742-eb9e121c4f38%22%7d</a> </p>	√
	9:30 AM – 12:30 PM	<p>Verification on Major NC closure evidence. Document review, site observation, workers/stakeholder interview (individual and group session) for:</p> <ol style="list-style-type: none"> <li>1. 2520928-202407-M1</li> </ol>	√
	12:30 PM	Closing Meeting	-

### Section 3: Assessment Findings

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

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table. On 16/01/2020, SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad )under its subsidiary Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation – Liberia) to Mano Palm Oil Industries Ltd (MPOI): <a href="https://sdguthrie.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/">https://sdguthrie.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/</a> .	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	Generally, all estates and mills excepted stated below or in the TBP are certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad ) acquired Bintang Palm Oil Mill in Johor in April 2017. As of Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 01/10/2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad ) have no control in the management. Refer TBP approval dated 13/07/2023.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	There are no new acquisitions. There is new propose on 2024 for Land legalization still in progress dated approval by RSPO on 13 July 2023 for these Estate. (1) Ladang Panjang Estate: 1,796.19 Ha. (2) Rantau Panjang Estate, Napal Estate / Karang Ringin Estate: 1,843.73 Ha. (3) Mangun Jaya Estate: 1,398.55 Ha. (4) Sungai Jernih Estate: 851.57 Ha.	Complied

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<p><i>Note:</i> <i>New acquisition is from the moment the company is legally registered with the local notary or chamber of commerce or equivalent.</i></p>	<p>(5) Pelanjau Estate (PT BAL) &amp; Beturus Estate (PT BAL): 4,071.76 Ha. (6) Karya Palma Estate (PT SNP): 476.70 Ha. West and East Estate: 1,452.93 Ha.</p>	
<p>Any deviations from the maximum periods requires approval by the RSPO Secretariat.</p>	<p>Although there is deviation has been identified at those Indonesia management units, but it has been justified and approved by RSPO Secretariat on 13/07/2023 that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p><u>Indonesia</u></p> <ul style="list-style-type: none"> <li>- PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification.</li> <li>- PT Mitral Austral Sejahtera: The properties were sold and currently SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad )have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019.</li> </ul> <p><u>Malaysia</u></p> <ul style="list-style-type: none"> <li>- Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate &amp; Chartquest Estate has been transferred to SOU Lavang.</li> <li>- Bintang Oil Mill: SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad ) acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.</li> </ul> <p><u>Papua New Guinea</u></p> <ul style="list-style-type: none"> <li>- Markham Farming Company Limited (MFCL)/ Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: <a href="http://www.rspo.org/certification/public-announcement">www.rspo.org/certification/public-announcement</a></li> </ul> <p><u>Liberia</u></p> <ul style="list-style-type: none"> <li>- As at 16/01/2020 SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad )under</li> </ul>	<p>Complied</p>

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	<p>its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI):  <a href="https://simedarbyplantation.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/">https://simedarbyplantation.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/</a>.</p> <p>ACOP 2022 has been cross-referenced as below:  <a href="https://rspo.org/members/1-0008-04-000-00/">https://rspo.org/members/1-0008-04-000-00/</a></p>	
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	Although there are lapses has been identified at those Indonesia management units, but it has been justified that these units are still awaiting to receive land titles.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as these 2 assets were disposed.	Complied
<b>Un-Certified Units or Holdings</b>		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units. Refer TBP approval dated 13/07/ 2023.	Complied
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	<p>New plantings within SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad )that have completed NPP notification:</p> <p>(1) NBPOL (Poliamba Limited) 23/05/2020          – no comments  <a href="https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/">https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/</a></p> <p>(2) NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/ 2018          – no comments  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiidiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/">https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiidiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/</a></p> <p>(3) NBPOL (Ramu Agri Industries Limited) 29/01/2018 – no comments  <a href="https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/">https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/</a></p> <p>(4) NBPOL (Ramu Agri Industries Limited) 02/09/2016 – no comments</p>	Complied



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	<p><a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/</a></p> <p>(5) NBPOL (Higaturu Oil Palms) 21/06/2016          – no comments  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/</a></p> <p>(6) NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/">https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/</a></p> <p>(7) NBPOL (Poliamba Limited – Lamendauen) 07/04/ 2014          – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/">https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/</a></p> <p>(8) NBPOL (Roka Mini estate) 04/11/2013          – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/</a></p> <p>(9) NBPOL (J estate) 01/11/2013          – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/</a></p> <p>(10) NBPOL (Higaturu Oil Palm) 14/12/2012          – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/">https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/</a></p> <p>(11) NBPOL (Ramu Agri Industries Ltd) 06/03/2012          – no comments captured in RSPO website:  <a href="https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/">https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/</a></p> <p>(12) Sime Darby (Liberia) Plantation Inc 06/03/2012          – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/">https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/</a></p> <p>(13) Sime Darby (Liberia) Plantation Inc 06/03/2012          – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/">https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/</a></p>	
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	<p>(14) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website <a href="https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/">https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/</a></p> <p>Management units for 12 – 14 above were disposed.</p>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p> <p><i>Note:</i>  <i>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>. The progress on the Liabilities shall be verified and reported. Please refer to BSI-RSPO Secretariat approval.</i></p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as both sites was disposed.</p> <p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancies between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of August 2023, 16 out of 19 management units in Indonesia operations completed LUCA review with 1 Concept note (covering all 19 affected manage units) has been endorsed by RSPO.</p> <p>As per Internal Audit conducted in 16-25 Oct 2023, and 13-17 Nov 2023, all issues of are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C.</p> <p>It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about land conflict has been lodge by stakeholders as at the day of audit.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 4.2</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad )have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism.</p> <p>As per Internal Audit conducted in 16-25 Oct 2023, and 13-17 Nov 2023, no labour dispute issues reported.</p> <p>It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about labour dispute has been lodge by stakeholders as at the day of audit.</p> <p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) have published Grievance mechanism that is applied to all management units. Disputes related to labour, stakeholders and communities are to be dealt using this mechanism</p>	<p>Complied</p>

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<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) maintains corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.</p> <p>Under RSPO DSF, the latest registered complaint for SD was in 2017. No latest complaint case reported in DSF.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p> <p><i>Note: if the internal audit is conducted against the RSPO P&amp;C only, it is a non-compliance for this requirement.</i></p>	<p>Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue is mainly waiting for Land Titles. The last audit was conducted in 16-25 Oct 2023, and 13-17 Nov 2023. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance. HCV Assessment has been conducted for all SD Guthrie Berhad (Formerly known as Sime Darby Plantation Berhad) operations since 2010, there has been no clearance of HCV areas after the HCV Assessment has been conducted and verified during the annual RSPO External and Internal Audit reports. The liability happened as there were no HCV Assessment done at the time of planting for the cases which were entered into the RACP process.</p>	<p>Complied</p>
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>No critical (Major) non-compliance raised against any of the RSPO P&amp;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. The last audit was conducted in 16-25 Oct 2023, and 13-17 Nov 2023.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Respective sites are maintaining the stakeholder engagements as part of the estates/mills' operations. Especially in Indonesia, socialization of company. Latest conducted in August 2023</p>	<p>Complied</p>

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

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

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**Approved Time Bound Plan**

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year	Date of Last TBP Verified and Approved by CB	REVISION OF THE TBP (Only applicable when revision is made)			
								Any revision from the last approved TBP? (Yes / No)	New Proposed Year for Certification	Justification of changes for each UoC	Date of approval from RSPO
Manggala	Indonesia	Manggala Mill	13.836	Certified	Not Applicable	23-Nov-10					
	Indonesia	Manggala -1 Estate	4.919	Certified	Not Applicable	23-Nov-10					
	Indonesia	Manggala -2 Estate	4.922	Certified	Not Applicable	23-Nov-10					
	Indonesia	Manggala -3 Estate	3.995	Certified	Not Applicable	23-Nov-10					
Alur Dumai	Indonesia	Alur Dumai Mill	3.759	Certified	Not Applicable	16-Jan-12					
	Indonesia	Alur Dumai Estate	3.759	Certified	Not Applicable	16-Jan-12					
Teluk Siak	Indonesia	Teluk Siak Mill	11,555.31	Certified	Not Applicable	11-Oct-11					
	Indonesia	Teluk Siak Estate	3,321.20	Certified	Not Applicable	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	3,799.21	Certified	Not Applicable	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	448.00	Not Certified	2023	NA		Yes	2024	Land legalization process for 448 ha at Pinang Sebatang Estate is still in process.	13-Jul-23
	Indonesia	Aneka Persada Estate	4,434.90	Certified	Not Applicable	11-Oct-11					

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Blang Simpo	Indonesia	Blang Simpo Mill	8,777.22	Certified	Not Applicable	3-May-13					
	Indonesia	Blang Simpo -1 Estate	3,460.06	Certified	Not Applicable	3-May-13					
	Indonesia	Blang Simpo -2 Estate	2,677.83	Certified	Not Applicable	3-May-13					
	Indonesia	Tamiang (PT PPP) Estate	1,451.99	Certified	Not Applicable	3-May-13					
	Indonesia	Batang Ara (PT PSK) Estate	1,187.34	Certified	Not Applicable	3-May-13					
Teluk Bakau	Indonesia	Teluk Bakau Mill	13,317.81	Certified	Not Applicable	11-Oct-11					
	Indonesia	Teluk Bakau Estate	4,025.07	Certified	Not Applicable	11-Oct-11					
	Indonesia	Nusa Lestari Estate	3,456.74	Certified	Not Applicable	11-Oct-11					
	Indonesia	Nusa Perkasa Estate	5,836.00	Certified	Not Applicable	11-Oct-11					
Mandah	Indonesia	Mandah Mill	12,366.18	Certified	Not Applicable	1-Apr-14					
	Indonesia	Mandah Estate	5,053.18	Certified	Not Applicable	1-Apr-14					
	Indonesia	Rotan Semelur Estate	7,313.00	Certified	Not Applicable	1-Apr-14					
Sungai Pinang	Indonesia	Sungai Pinang Mill	6.513	Certified	Not Applicable	11-Sep-12					
	Indonesia	Sungai Pinang Estate	3,374.42	Certified	Not Applicable	11-Sep-12					
	Indonesia	Bukit Pinang Estate	3,138.58	Certified	Not Applicable	11-Sep-12					
Ladang Panjang	Indonesia	Ladang Panjang Mill	1,202.04	Certified	Not Applicable	9-Jul-12					
	Indonesia	Ladang Panjang Estate	1,202.04	Certified	Not Applicable	9-Jul-12					
	Indonesia	Ladang Panjang Estate	1,796.19	Not Certified	2023	NA		Yes	2024	Land legalization process for 1,796.19 ha is still in progress.	13-Jul-23
Rantau Panjang	Indonesia	Rantau Panjang Mill	10,139.91	Certified	Not Applicable	16-Mar-12					

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Rantau Panjang	Indonesia	Bumi Ayu Estate	2,960.98	Certified	Not Applicable	16-Mar-12					
	Indonesia	Rantau Panjang Estate	2,679.74	Certified	Not Applicable	16-Mar-12					
	Indonesia	Rantau Panjang Estate	1,843.73	Not Certified	2023	NA		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Napal Estate/Karang Ringin	4,359.74	Certified	Not Applicable	16-Mar-12					
	Indonesia	Napal Estate/Karang Ringin	1,843.73	Not Certified	2023	N/A		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Mangun Jaya Estate	139.45	Certified	Not Applicable	16-Mar-12					
	Indonesia	Mangun Jaya Estate	1,398.55	Not Certified	2023	N/A		Yes	2024	Land legalization process of 1398.55 ha is still in process.	13-Jul-23
	Indonesia	Sungai Jernih Estate	851.57	Not Certified	2023	N/A		Yes	2024	Land legalization process of 851.57 ha is still in process.	13-Jul-23
	Angsana	Indonesia	Angsana Mill	15,151.19	Certified	Not Applicable	6-Jul-11				

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	Indonesia	Angsana Estate	3,250.06	Certified	Not Applicable	6-Jul-11					
	Indonesia	Gunung Sari Estate	2,826.94	Certified	Not Applicable	6-Jul-11					
Mustika	Indonesia	Mustika Mill	14,840.76	Certified	Not Applicable	3-Jul-13					
	Indonesia	Mustika Estate	3,648.74	Certified	Not Applicable	3-Jul-13					
	Indonesia	Pantai bonati Estate	2,534.00	Certified	Not Applicable	6-Jul-11					
Gunung Aru	Indonesia	Gunung Aru Mill	12,740.54	Certified	Not Applicable	5-Jul-11					
	Indonesia	Gunung Aru Estate	2,684.41	Certified	Not Applicable	5-Jul-11					
	Indonesia	Gunung Kemas Estate	3,511.36	Certified	Not Applicable	5-Jul-11					
	Indonesia	Laut Timur Estate	3,207.28	Certified	Not Applicable	5-Jul-11					
	Indonesia	Pantai Timur Estate	3,337.49	Certified	Not Applicable	5-Jul-11					
Ungkaya	Indonesia	Ungkaya Mill	4,145.00	Certified	Not Applicable	10-Jul-12					
	Indonesia	Ungkaya Estate	4,145.00	Certified	Not Applicable	10-Jul-12					
Rantau	Indonesia	Rantau Mill	24,169.56	Certified	Not Applicable	30-Dec-11					
	Indonesia	Rantau Estate	4,638.00	Certified	Not Applicable	30-Dec-11					
	Indonesia	Matalok Estate	3,082.00	Certified	Not Applicable	30-Dec-11					
	Indonesia	Selabak Estate ( PT SAA)	3,757.67	Certified	Not Applicable	16-Mar-12					
	Indonesia	Randi Estate (PT SAA)	2,882.98	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sangkoh Estate (PT SAA)	3,789.34	Certified	Not Applicable	16-Mar-12					
	Indonesia	Lanting Estate (PT LMR)	3,249.27	Certified	Not Applicable	16-Mar-12					
Betung	Indonesia	Betung Mill	7,579.57	Certified	Not Applicable	1-Apr-14					
	Indonesia	Betung Estate	4,266.00	Certified	Not Applicable	1-Apr-14					
	Indonesia	Sekayu Estate	3,313.57	Certified	Not Applicable	1-Apr-14					



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Bebunga	Indonesia	Bebunga Mill	14,274.77	Certified	Not Applicable	16-Mar-12					
	Indonesia	Bebunga Estate	3,958.43	Certified	Not Applicable	16-Mar-12					
	Indonesia	Bakau Estate	5,342.14	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sungai Cengal Estate	4,974.20	Certified	Not Applicable	16-Mar-12					
Pondok Labu	Indonesia	Pondok Labu Mill	15,876.20	Certified	Not Applicable	16-Mar-12					
	Indonesia	Pondok Labu Estate	3,569.53	Certified	Not Applicable	16-Mar-12					
	Indonesia	Binturung Estate	4,072.01	Certified	Not Applicable	16-Mar-12					
	Indonesia	Rampa Estate	3,656.20	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sesulung Estate	4,578.46	Certified	Not Applicable	16-Mar-12					
Sekunyir	Indonesia	Sekunyir Mill	7,734.59	Certified	Not Applicable	23-Nov-10					
	Indonesia	Sekunyir Estate	3,555.19	Certified	Not Applicable	23-Nov-10					
	Indonesia	Seruyan Estate	4,179.40	Certified	Not Applicable	23-Nov-10					
Sukamandang	Indonesia	Sukamandang Mill	14,779.92	Certified	Not Applicable	5-Jul-11					
	Indonesia	Sukamandang Estate	3,936.56	Certified	Not Applicable	5-Jul-11					
	Indonesia	Sapiri Estate	3,530.90	Certified	Not Applicable	5-Jul-11					
	Indonesia	Baras Danum Estate	3,664.60	Certified	Not Applicable	5-Jul-11					
	Indonesia	Kuala Kuayan Estate	3,647.86	Certified	Not Applicable	5-Jul-11					
Pematang	Indonesia	Pematang Mill	16,601.66	Certified	Not Applicable	5-Jul-11					
	Indonesia	Pematang Estate	3,857.91	Certified	Not Applicable	5-Jul-11					
	Indonesia	Kawan Batu Estate	4,400.00	Certified	Not Applicable	5-Jul-11					
	Indonesia	Hatantiring Estate	3,811.00	Certified	Not Applicable	5-Jul-11					
	Indonesia	Batang Garing Estate	4,532.75	Certified	Not Applicable	5-Jul-11					

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Lembiru	Indonesia	Lembiru Mill	9,409.07	Certified	Not Applicable	3-Jul-14					
	Indonesia	Lembiru Estate	4,929.49	Certified	Not Applicable	3-Jul-14					
	Indonesia	Awatan Estate	3,476.79	Certified	Not Applicable	3-Jul-14					
	Indonesia	Pelanjau Estate (PT BAL)	1,002.79	Certified	Not Applicable	3-Jul-19					
	Indonesia	Pelanjau Estate (PT BAL)	4,071.76	Not Certified	2023	N/A		Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Beturus Estate (PT BAL)	4,071.76	Not Certified	2023	N/A		Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Karya Palma Estate (PT SNP)	476.70	Not Certified	2023	N/A		Yes	2024	Land legalization process for 476.70 ha is still in process.	13-Jul-23
Bukit Ajong	Indonesia	Bukit Ajong Mill	11,498.82	Certified	Not Applicable	18-Oct-10					
	Indonesia	West Estate	4,562.34	Certified	Not Applicable	18-Oct-10					
	Indonesia	West Estate	1,452.93	Not Certified	2023	N/A		Yes	2024	Land legalization process for 1452.93 ha (West and East Estate) is still in process.	13-Jul-23
	Indonesia	East Estate	2,665.48	Certified	Not Applicable	18-Oct-10					

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	Indonesia	East Estate/Sei Mawang	1,452.93	Not Certified	2023	N/A		Yes	2024	Land legalization process for 1452.93 ha (West and East Estate) is still in process.	13-Jul-23
Sg. Dingin	Malaysia	Sungai Dingin Oil Mill	19,517.17	Certified	Not Applicable	12-Aug-10					
	Malaysia	Anak Kulim Estate	1,523.35	Certified	Not Applicable	12-Aug-10					
	Malaysia	Sungai Dingin Estate	4,244.03	Certified	Not Applicable	12-Aug-10					
	Malaysia	Somme Estate	941.56	Certified	Not Applicable	12-Aug-10					
	Malaysia	Bukit Selarong Estate	3,896.17	Certified	Not Applicable	12-Aug-10					
	Malaysia	Padang Buluh Estate	4,008.47	Certified	Not Applicable	12-Aug-10					
	Malaysia	Bukit Hijau Estate	2,725.00	Certified	Not Applicable	12-Aug-10					
	Malaysia	Jentayu Estate	2,178.59	Certified	Not Applicable	12-Aug-10					
Chersonese	Malaysia	Chersonese Oil Mill	11,099.36	Certified	Not Applicable	5-Oct-11					
	Malaysia	Chersonese Estate	3,293.72	Certified	Not Applicable	5-Oct-11					
	Malaysia	Kalumpong Estate	2,716.80	Certified	Not Applicable	5-Oct-11					
	Malaysia	Tali Ayer Estate	3,756.10	Certified	Not Applicable	5-Oct-11					
	Malaysia	Holyrood Estate	1,332.74	Certified	Not Applicable	5-Oct-11					
Elphil	Malaysia	Elphil Oil Mill	6,814.60	Certified	Not Applicable	18-Jun-11					
	Malaysia	Kamuning Estate	3,888.43	Certified	Not Applicable	18-Jun-11					
	Malaysia	Elphil Estate	1,865.43	Certified	Not Applicable	18-Jun-11					
	Malaysia	Kinta Kellas Estate	1,060.74	Certified	Not Applicable	18-Jun-11					
Flemington	Malaysia	Flemington Oil Mill	11,226.23	Certified	Not Applicable	5-Oct-11					

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	Malaysia	Flemington Estate	1,906.84	Certified	Not Applicable	5-Oct-11					
	Malaysia	Bagan Datoh Estate	3,781.86	Certified	Not Applicable	5-Oct-11					
	Malaysia	Sabak Bernam Estate	2,511.79	Certified	Not Applicable	5-Oct-11					
	Malaysia	Sg. Samak Estate	3,025.74	Certified	Not Applicable	5-Oct-11					
Seri Intan/Selaba	Malaysia	Seri Intan Oil Mill	14,474.29	Certified	Not Applicable	3-Mar-11					
	Malaysia	Selaba Oil Mill	1,549.75	Certified	Not Applicable	3-Mar-11					
	Malaysia	Seri Intan (+ Selaba) Estate	4,013.16	Certified	Not Applicable	3-Mar-11					
	Malaysia	Sabrang Estate	3,945.23	Certified	Not Applicable	3-Mar-11					
	Malaysia	Sogomana Estate	2,214.08	Certified	Not Applicable	3-Mar-11					
	Malaysia	Sg. Wangi Estate	2,226.66	Certified	Not Applicable	3-Mar-11					
	Malaysia	Bikam Estate	2,075.16	Certified	Not Applicable	3-Mar-11					
	Malaysia	Cluny (+ Bedford) Estate	1,549.75	Certified	Not Applicable	3-Mar-11					
Tennamaram	Malaysia	Tennamaram Oil Mill	10,706.26	Certified	Not Applicable	3-Mar-11					
	Malaysia	Tennamaram Estate	1,981.60	Certified	Not Applicable	3-Mar-11					
	Malaysia	Sungai Buluh Estate	5,152.22	Certified	Not Applicable	3-Mar-11					
	Malaysia	Bukit Talang Estate	3,572.44	Certified	Not Applicable	3-Mar-11					
Bukit Kerayong	Malaysia	Bukit Benut Oil Mill	6,346.90	Certified	Not Applicable	15-Apr-11					
	Malaysia	Bukit Benut Estate	2,699.28	Certified	Not Applicable	15-Apr-11					
	Malaysia	Bukit Cheraka Estate	3,647.62	Certified	Not Applicable	15-Apr-11					
East	Malaysia	East Oil Mill	10,902.94	Certified	Not Applicable	19-May-10					
	Malaysia	East Estate	5,634.45	Certified	Not Applicable	19-May-10					

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	Malaysia	Sepang Estate	2,092.28	Certified	Not Applicable	19-May-10					
	Malaysia	Dusun Durian Estate	3,176.21	Certified	Not Applicable	19-May-10					
West	Malaysia	West Oil Mill	5,912.69	Certified	Not Applicable	19-May-10					
	Malaysia	West Estate	5,912.69	Certified	Not Applicable	19-May-10					
Bukit Puteri	Malaysia	Bukit Puteri Oil Mill	3,875.80	Certified	Not Applicable	7-Jul-11					
	Malaysia	Bukit Puteri Estate	3,875.80	Certified	Not Applicable	7-Jul-11					
Kerdu	Malaysia	Kerdu Oil Mill	13,781.50	Certified	Not Applicable	7-Jul-11					
	Malaysia	Kerdu Estate	5,683.04	Certified	Not Applicable	7-Jul-11					
	Malaysia	Mentakab Estate	3,266.49	Certified	Not Applicable	7-Jul-11					
	Malaysia	Chenor Estate	2,834.98	Certified	Not Applicable	7-Jul-11					
	Malaysia	Sg Mai Estate	1,996.99	Certified	Not Applicable	7-Jul-11					
Jabor	Malaysia	Jabor Oil Mill	2,332.92	Certified	Not Applicable	7-Jul-11					
	Malaysia	Jabor Estate	2,332.92	Certified	Not Applicable	7-Jul-11					
Labu	Malaysia	Labu Oil Mill	4,529.72	Certified	Not Applicable	30-Dec-11					
	Malaysia	Labu Estate	4,529.72	Certified	Not Applicable	30-Dec-11					
Tanah Merah	Malaysia	Tanah Merah Oil Mill	6,203.87	Certified	Not Applicable	19-May-10					
	Malaysia	Tanah Merah Estate	4,341.73	Certified	Not Applicable	19-May-10					
	Malaysia	Bukit Pelandok Estate	1,862.14	Certified	Not Applicable	19-May-10					
Sua Betong	Malaysia	Sua Betong Oil Mill	18,457.27	Certified	Not Applicable	18-Feb-14					
	Malaysia	Sua Betong Estate	2,870.75	Certified	Not Applicable	18-Feb-14					
	Malaysia	Sengkang Estate	2,831.51	Certified	Not Applicable	18-Feb-14					
	Malaysia	Bradwall Estate	3,828.34	Certified	Not Applicable	18-Feb-14					

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	Malaysia	PD Lukut Estate	1,523.79	Certified	Not Applicable	18-Feb-14					
	Malaysia	Tampin Linggi Estate	2,106.71	Certified	Not Applicable	18-Feb-14					
	Malaysia	Sg. Bahru Estate	1,427.31	Certified	Not Applicable	18-Feb-14					
	Malaysia	Salak Estate	3,868.86	Certified	Not Applicable	18-Feb-14					
Kok Foh	Malaysia	Kok Foh Oil Mill	14,852.64	Certified	Not Applicable	7-Jul-11					
	Malaysia	Muar River Estate	1,584.62	Certified	Not Applicable	7-Jul-11					
	Malaysia	Sg. Senarut Estate + Sg Gemas Estate	2,958.38	Certified	Not Applicable	7-Jul-11					
	Malaysia	Kok Foh Estate	2,275.84	Certified	Not Applicable	7-Jul-11					
	Malaysia	Bukit Pilah Estate	3,667.31	Certified	Not Applicable	7-Jul-11					
	Malaysia	St. Helier Estate	1,992.65	Certified	Not Applicable	7-Jul-11					
	Malaysia	Sungai Sabaling Estate	1,321.35	Certified	Not Applicable	7-Jul-11					
	Malaysia	Pertang Estate	1,052.49	Certified	Not Applicable	7-Jul-11					
Kempas	Malaysia	Kempas Oil Mill	11,828.51	Certified	Not Applicable	20-May-10					
	Malaysia	Kempas Estate	4,505.45	Certified	Not Applicable	20-May-10					
	Malaysia	Tangkah Estate	2,537.78	Certified	Not Applicable	20-May-10					
	Malaysia	Kemuning Estate	2,671.05	Certified	Not Applicable	20-May-10					
	Malaysia	Serkam Estate	2,114.23	Certified	Not Applicable	20-May-10					
Diamond Jubilee	Malaysia	Diamond Jubilee Palm Oil Mill	7,356.19	Certified	Not Applicable	5-Oct-11					
	Malaysia	Diamond Jubilee Estate	2,836.19	Certified	Not Applicable	5-Oct-11					
	Malaysia	Bukit Asahan Estate	3,072.18	Certified	Not Applicable	5-Oct-11					
	Malaysia	Welch Estate	1,447.82	Certified	Not Applicable	5-Oct-11					

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Pagoh	Malaysia	Pagoh Oil Mill	7,418.59	Certified	Not Applicable	28-Jan-14					
	Malaysia	Pagoh Estate	2,325.93	Certified	Not Applicable	28-Jan-14					
	Malaysia	Lanadron Estate	1,964.44	Certified	Not Applicable	28-Jan-14					
	Malaysia	Pengkalan Bukit Estate	3,128.22	Certified	Not Applicable	28-Jan-14					
Chaah	Malaysia	Chaah Oil Mill	8,699.93	Certified	Not Applicable	18-Nov-10					
	Malaysia	Chaah Estate	2,795.36	Certified	Not Applicable	18-Nov-10					
	Malaysia	Sg. Simpang Kiri Estate	2,371.66	Certified	Not Applicable	18-Nov-10					
	Malaysia	North Labis Estate	3,532.91	Certified	Not Applicable	18-Nov-10					
Gunung Mas	Malaysia	Gunung Mas Oil Mill	12,305.54	Certified	Not Applicable	19-May-10					
	Malaysia	Gunung Mas Estate	3,466.17	Certified	Not Applicable	19-May-10					
	Malaysia	Kempas Klebang Estate	2,473.06	Certified	Not Applicable	19-May-10					
	Malaysia	Bukit Paloh Estate	3,390.90	Certified	Not Applicable	19-May-10					
	Malaysia	Yong Peng Estate	2,975.41	Certified	Not Applicable	19-May-10					
Bukit Benut	Malaysia	Bukit Benut Oil Mill	8,495.13	Certified	Not Applicable	5-Oct-11					
	Malaysia	Bukit Benut Estate	2,799.78	Certified	Not Applicable	5-Oct-11					
	Malaysia	Lambak Elaeis Estate	3,740.16	Certified	Not Applicable	5-Oct-11					
	Malaysia	CEP Nyior Estate	1,955.19	Certified	Not Applicable	5-Oct-11					
Ulu Remis	Malaysia	Ulu Remis Oil Mill	17,115.58	Certified	Not Applicable	11-Apr-11					
	Malaysia	Ulu Remis Estate	2,598.25	Certified	Not Applicable	11-Apr-11					
	Malaysia	Cenas Estate	1,974.06	Certified	Not Applicable	11-Apr-11					
	Malaysia	Bukit Badak Estate	3,234.25	Certified	Not Applicable	11-Apr-11					
	Malaysia	Tun Dr. Ismail Estate	4,271.44	Certified	Not Applicable	11-Apr-11					

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	Malaysia	Pekan Estate	3,258.70	Certified	Not Applicable	11-Apr-11					
	Malaysia	Sembrong Estate	1,778.88	Certified	Not Applicable	11-Apr-11					
Bukit Kerayong	Malaysia	Bukit Kerayong Oil Mill	11,371.82	Certified	Not Applicable	29-Mar-11					
	Malaysia	Sri Pulai Estate	2,049.87	Certified	Not Applicable	29-Mar-11					
	Malaysia	Kulai Estate	3,023.42	Certified	Not Applicable	29-Mar-11					
	Malaysia	Layang Estate	3,258.90	Certified	Not Applicable	29-Mar-11					
	Malaysia	CEP Renggam Estate	3,039.63	Certified	Not Applicable	29-Mar-11					
Sandakan Bay	Malaysia	Sandakan Bay Oil Mill	16,764.34	Certified	Not Applicable	1-Oct-08					
	Malaysia	Tun Tan Siew Sin Estate	3,125.60	Certified	Not Applicable	1-Oct-08					
	Malaysia	Tunku Estate	3,199.05	Certified	Not Applicable	1-Oct-08					
	Malaysia	Tigowis Estate	2,074.02	Certified	Not Applicable	1-Oct-08					
	Malaysia	Sentosa Estate	3,545.54	Certified	Not Applicable	1-Oct-08					
	Malaysia	Segaliud Estate	4,820.13	Certified	Not Applicable	1-Oct-08					
Melalap	Malaysia	Melalap Oil Mill	5246.18	Certified	Not Applicable	21-Jan-11					
	Malaysia	Melalap Estate	2,096.73	Certified	Not Applicable	21-Jan-11					
	Malaysia	Sapong Estate	3,149.45	Certified	Not Applicable	21-Jan-11					
Binuang	Malaysia	Binuang Oil Mill	11,659.58	Certified	Not Applicable	16-Jan-09					
	Malaysia	Binuang Estate	3,271.08	Certified	Not Applicable	16-Jan-09					
	Malaysia	Sungang Estate	3,407.98	Certified	Not Applicable	16-Jan-09					
	Malaysia	Tingayu Estate	1,881.08	Certified	Not Applicable	16-Jan-09					
	Malaysia	Jeleta Bumi Estate	3,099.44	Certified	Not Applicable	16-Jan-09					
Giram	Malaysia	Giram Oil Mill	8,345.02	Certified	Not Applicable	16-Jan-09					



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	Malaysia	Giram Estate	4,166.98	Certified	Not Applicable	16-Jan-09					
	Malaysia	Mostyn Estate	4,178.04	Certified	Not Applicable	16-Jan-09					
Merotai	Malaysia	Merotai Oil Mill	11,545.71	Certified	Not Applicable	16-Jan-09					
	Malaysia	Merotai Estate	3,052.66	Certified	Not Applicable	16-Jan-09					
	Malaysia	Imam Estate	3,773.56	Certified	Not Applicable	16-Jan-09					
	Malaysia	Tiger Estate	2,497.86	Certified	Not Applicable	16-Jan-09					
	Malaysia	Table Estate	2,221.63	Certified	Not Applicable	16-Jan-09					
	Malaysia	Lavang Oil Mill	24,836.54	Certified	Not Applicable	30-Dec-11					
Lavang	Malaysia	Lavang Estate	4,363.83	Certified	Not Applicable	30-Dec-11					
	Malaysia	Rasan Estate	3,454.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Belian Estate	2,847.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Kelida Estate	2,460.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Lavang (Special) Estate	included under Lavang Estate Ha	Certified	Not Applicable	30-Dec-11					
	Malaysia	Pekaka Estate	2,626.14	Certified	Not Applicable	30-Dec-11					
	Malaysia	Ruai Estate	2,460.96	Certified	Not Applicable	30-Dec-11					
	Malaysia	Dulang Estate	2,548.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Charquest Estate	1,448.71	Certified	Not Applicable	30-Dec-11					
	Malaysia	Paroh Estate	2,627.90	Certified	Not Applicable	30-Dec-11					
	Rajawali	Malaysia	Rajawali Oil Mill	14,104.45	Certified	Not Applicable	30-Dec-11				

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	Malaysia	Rajawali Estate	6,087.27	Certified	Not Applicable	30-Dec-11					
	Malaysia	Samudera Estate	3,308.60	Certified	Not Applicable	30-Dec-11					
	Malaysia	Semarak Estate	2,248.68	Certified	Not Applicable	30-Dec-11					
	Malaysia	Bayu Estate	2,459.90	Certified	Not Applicable	30-Dec-11					
Derawan	Malaysia	Derawan Oil Mill	9,528.83	Certified	Not Applicable	30-Dec-11					
	Malaysia	Derawan Estate	2,490.79	Certified	Not Applicable	30-Dec-11					
	Malaysia	Sahua Estate	2,644.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Takau Estate	2,107.00	Certified	Not Applicable	30-Dec-11					
	Malaysia	Damai Estate	2,287.04	Certified	Not Applicable	30-Dec-11					
Guadalcanal Plains Palm Oil Limited (GPPOL)	Solomon Islands	Tetere Oil Mill	9,025.69	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Tetere Estate	2,947.79	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Ngalimbiu Estate	2,498.65	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Mbalisuna Estate	2,868.47	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Smallholders – West Zone (83)	245.50	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Smallholders – Central Zone (53)	181.71	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Smallholders – MBA East Zone (59)	180.80	Certified	Not Applicable	18-Mar-11					
	Solomon Islands	Smallholders – MBE East Zone (37)	102.77	Certified	Not Applicable	18-Mar-11					

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Milne Bay Estates (MBE)	Papua New Guinea	Hagita Oil Mill	16,508.59	Certified	Not Applicable	15-Feb-13					
	PNG	Giligili Estate	1,095.47	Certified	Not Applicable	15-Feb-13					
	PNG	Hagita Estate	2,450.02	Certified	Not Applicable	15-Feb-13					
	PNG	Waigani Estate	2,341.13	Certified	Not Applicable	15-Feb-13					
	PNG	Sagarai Estate	2,864.55	Certified	Not Applicable	15-Feb-13					
	PNG	Padipadi Estate	4,517.67	Certified	Not Applicable	15-Feb-13					
	PNG	Mariawatte Estate	1,680.14	Certified	Not Applicable	15-Feb-13					
	PNG	Smallholders - East Gurney Estate (259)	450.59	Certified	Not Applicable	15-Feb-13					
	PNG	Smallholders - West Gurney Estate (231)	479.13	Certified	Not Applicable	15-Feb-13					
	PNG	Smallholders - East Sagarai Estate (156)	283.93	Certified	Not Applicable	15-Feb-13					
	PNG	Smallholders - West Sagarai Estate (212)	345.96	Certified	Not Applicable	15-Feb-13					
Poliamba (POL)	Papua New Guinea	Poliamba Oil Mill	10,720.53	Certified	Not Applicable	19-Mar-12					
	PNG	Kara Estate	1,032.10	Certified	Not Applicable	19-Mar-12					
	PNG	Nalik Estate	2,666.75	Certified	Not Applicable	19-Mar-12					
	PNG	West Coast Estate	627.60	Certified	Not Applicable	19-Mar-12					
	PNG	Noatsi Estate	2,064.10	Certified	Not Applicable	19-Mar-12					
	PNG	Madak Estate	1,517.11	Certified	Not Applicable	19-Mar-12					
	PNG	Smallholders -North Division (615)	1,022.12	Certified	Not Applicable	19-Mar-12					

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	PNG	Smallholders- Division (866)	South	1,257.21	Certified	Not Applicable	19-Mar-12					
	PNG	Smallholders Division (309)	-West	533.54	Certified	Not Applicable	19-Mar-12					
Ramu Agricultural Industries Ltd (RAIL)	Papua New Guinea	Gusap Mill		14,606.08	Certified	Not Applicable	5-Aug-10					
	PNG	Gusap East Estate (Gusap)		2,856.45	Certified	Not Applicable	5-Aug-10					
	PNG	Gusap West Estate (Paddock)		3,019.09	Certified	Not Applicable	5-Aug-10					
	PNG	Surinam Estate		2,154.14	Certified	Not Applicable	5-Aug-10					
	PNG	Dumpu Estate		2,254.36	Certified	Not Applicable	5-Aug-10					
	PNG	Ngaru Estate		854.33	Certified	Not Applicable	5-Aug-10					
	PNG	J Estate (Jephcott) Estate		2,824.01	Certified	Not Applicable	5-Aug-10					
	PNG	Smallholders - VOPs (71)	Madang	360.00	Certified	Not Applicable	5-Aug-10					
	PNG	Smallholders - VOPs (253)	Morobe	283.70	Certified	Not Applicable	5-Aug-10					
Higaturu Oil Palm (HOP)	Papua New Guinea	Sangara Oil Mill			Certified	Not Applicable	1-Feb-13					
	PNG	Mamba Oil Mill			Certified	Not Applicable	1-Feb-13					
	PNG	Embi Estate		1,737.78	Certified	Not Applicable	1-Feb-13					
	PNG	Ambogo Estate		2,040.00	Certified	Not Applicable	1-Feb-13					
	PNG	Sangara Estate		1,780.00	Certified	Not Applicable	1-Feb-13					
	PNG	Sumbiripa Estate		2,545.00	Certified	Not Applicable	1-Feb-13					

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	PNG	Mamba Estate	4,013.10	Certified	Not Applicable	1-Feb-13					
	PNG	Sambogo Estate	2,637.85	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Sorovi Division (2019)	3,940.21	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Saiho Division (842)	1,493.06	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Aeka Division (911)	1,474.23	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Igora Division (1367)	2,940.15	Certified	Not Applicable	1-Feb-13					
	PNG	Scheme Smallholder Ilimo Division (671)	1,063.66	Certified	Not Applicable	1-Feb-13					
West New Britain (WNB)	Papua New Guinea	Mosa Oil Mill		Certified	Not Applicable	10-Sep-08					
	PNG	Kumbango Oil Mill		Certified	Not Applicable	10-Sep-08					
	PNG	Kapiura Mill		Certified	Not Applicable	10-Sep-08					
	PNG	Numundo Mill		Certified	Not Applicable	10-Sep-08					
	PNG	Waraston Mill		Certified	Not Applicable	10-Sep-08					
	PNG	Bebere Estate	2,226.71	Certified	Not Applicable	10-Sep-08					
	PNG	Kumbango Estate	2,610.80	Certified	Not Applicable	10-Sep-08					
	PNG	Togulo Estate	1,509.20	Certified	Not Applicable	10-Sep-08					
	PNG	Dami Estate	1,507.00	Certified	Not Applicable	10-Sep-08					
	PNG	Waisisi Estate	1,090.00	Certified	Not Applicable	10-Sep-08					
	PNG	Kautu Estate	4,280.60	Certified	Not Applicable	10-Sep-08					

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PNG	Karausu Estate	2,387.64	Certified	Not Applicable	10-Sep-08					
PNG	Moroa Estate	848.16	Certified	Not Applicable	10-Sep-08					
PNG	Bilomi Estate	2,011.70	Certified	Not Applicable	10-Sep-08					
PNG	Loata Estate	562.00	Certified	Not Applicable	10-Sep-08					
PNG	Haella Estate	4,220.30	Certified	Not Applicable	10-Sep-08					
PNG	Garu Estate	3,709.60	Certified	Not Applicable	10-Sep-08					
PNG	Daliavu Estate	2,484.10	Certified	Not Applicable	10-Sep-08					
PNG	Sapuri Estate	2,180.90	Certified	Not Applicable	10-Sep-08					
PNG	Malilimi Estate	3,837.00	Certified	Not Applicable	10-Sep-08					
PNG	Rigula Estate	3,720.00	Certified	Not Applicable	10-Sep-08					
PNG	Nomundo Estate	2,645.17	Certified	Not Applicable	10-Sep-08					
PNG	Navarai / Karato ME /KDC EU Estate	1,103.77	Certified	Not Applicable	10-Sep-08					
PNG	Volupai / Lotomgam / Natupi / Goruru Estate	1,992.59	Certified	Not Applicable	10-Sep-08					
PNG	Lolokoru Estate	2,453.10	Certified	Not Applicable	10-Sep-08					
PNG	Ove Estate	3,541.00	Certified	Not Applicable	10-Sep-08					
PNG	Tamare Estate	1,362.70	Certified	Not Applicable	10-Sep-08					
PNG	Smallholders LSS Mosa (1822)	5,008.53	Certified	Not Applicable	10-Sep-08					
PNG	Smallholders VOP East (1817)	5,324.37	Certified	Not Applicable	10-Sep-08					
PNG	Smallholders VOP Central (1964)	5,756.57	Certified	Not Applicable	10-Sep-08					

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	PNG	Smallholders VOP West (1279)	2,804.10	Certified	Not Applicable	10-Sep-08					
	PNG	Smallholders LSS Kapiura (551)	551.00	Certified	Not Applicable	10-Sep-08					
	PNG	Smallholders VOP Kapiura (850)	847.00	Certified	Not Applicable	10-Sep-08					
	PNG	Smallholders Kaulong/Akami/Pushiki/R epamira/Sakapei (20)	700.37	Certified	Not Applicable	10-Sep-08					
Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Papua New Guinea	Erap Mill	5,399.40	Certified	Not Applicable	27-Mar-20				There is total area for NPP: 710.30 ha which is currently excluded from the certification scope of MFCL until the NPP is approved.	
	PNG	Munum Estate	1,734.57	Certified	Not Applicable	27-Mar-20					
	PNG	Maralumi Estate	2,427.15	Certified	Not Applicable	27-Mar-20					
	PNG	Erap Estate	1,237.68	Certified	Not Applicable	27-Mar-20					

### 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 1 (One ) Critical; 1(One) Minor nonconformities and 1 (One) Opportunity For Improvement raised. The *key in certification unit name* 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 (not applicable for RSPO ISH standard/audit). The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
<b>NCR Ref #</b>	2520928-202407-M1	<b>Issued Date</b>	12/07/2024
<b>Due Date</b>	11/10/2024	<b>Closure Date</b>	11/09/2024
<b>Indicator &amp; Category (Critical / Minor)</b>	3.6.1 (Critical)		
<b>Statement of Nonconformity:</b>	Mitigation plans and procedure has not been effectively implemented.		
<b>Requirement Reference:</b>	<b>(C)</b> All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
<b>Objective Evidence:</b>	<p>Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The Chemical Health Risk Assessment Report (Ref. Number: No:18/2023) conducted by Exxx Cxxxx &amp; Exxxxxx Plt (DOSH Registration: HQ/16/ASS/00/69) on 23/05/2023. Stated in the assessment report, fogging operator need to be included in the annual medical surveillance.</p> <p>Safe fogging procedure, 2021; clause 5.2; before fogging activities; 5.2.2; the fogger shall conduct medical surveillance on Organophosphate (OP) before conducting fogging activity. This will be focus on internal employee as in CHRA report recommendation for malathion or sumithion which are OP.</p> <p>Fogging activities has been conducted on 21-22/02/2024 by a workshop fitter, xxxx xxxxx xxx and latest medical surveillance has been done 01/05/2024 for manganese and did not include assessment for Cholinesterase. There is no medical surveillance has been conducted prior the operation. This is not inline with the SOP stated above.</p>		
<b>Corrections:</b>	Lambak Elias Estate (LEE) immediately sent the workshop fitter for medical surveillance on 10 July 2024 that include Cholinesterase.		
<b>Root Cause Analysis:</b>	The fogging was done due to an urgent request from Kementerian Kesihatan Malaysia (KKM) for Lambak Elias Estate (LEE) to perform the activity as soon as possible due to a dengue outbreak. It is not a routine activity and it has been years since last fogging was done. Hence, due to the rarity of the case, LEE has missed to include Cholinesterase in the list of medical surveillance for workshop fitter		



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<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Monitoring of Medical Surveillance process and result will be done by Medical Assistant (MA), Executive and Manager to ensure the assessment includes all required parameters for the worker related to fogging activity.</li> <li>2. For future fogging activity, OU Management to appoint Guthrie Agri-Bio Sdn Bhd and ensure to follow the estate Fogging SOP and HIRARC.</li> <li>3. If emergency to carry out fogging by estate workers, OU Management to follow the estate fogging SOP and HIRARC which includes medical surveillance requirement prior to the activity.</li> <li>4. OU Management will communicate with RHSE for any urgent related to fogging activity . OU management will discussed in OSH meeting on any requirement related to urgent/emergency non routine activity.</li> </ol>
<b>Assessment Conclusion:</b>	<p>Verification done by auditor as per below</p> <ol style="list-style-type: none"> <li>1. Medical surveillance records for the fogging operator dated 10/07/2024 sent to Pathology &amp; clinical laboratory (M) Sdn.Bhd and has been tested for Cholinesterase which the results is in line with the parameter.</li> <li>2. SOP and HIRARC for fogging activities which include that medical surveillance need to be done before and after the fogging activities.</li> <li>3. Monitoring of chemical handlers for medical surveillance required as per SOP</li> <li>4. As per interview with the fogging operator, there is no fogging activities has been conducted by him since the last done in February 2024</li> </ol> <p>As a result of these findings and verifications, the Major Non-Conformance (NC) raised has been officially closed. The comprehensive documentation and verification process ensured transparency and alignment with the doctor's recommendations for the worker's continued light-duty assignment.</p>

Non-conformity			
<b>NCR Ref #</b>	2520928-202407-N1	<b>Issued Date</b>	12/07/2024
<b>Due Date</b>	Next ASA	<b>Closure Date</b>	Open
<b>Indicator &amp; Category (Critical / Minor)</b>	7.3.1 (Minor)		
<b>Statement of Nonconformity:</b>	Waste management and disposal plan was not fully demonstrated		
<b>Requirement Reference:</b>	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
<b>Objective Evidence:</b>	<p>With reference to the Scheduled Wastes (Hazardous Waste) Management (Doc ID: SD/SDP/PSQM (ESH)/203-EN1) dated 16/02/2015, under clause 6.6.5 Disposal shall be done through DOE registered contractor.</p> <p>Evident the latest disposal record of used PPE under SW409 by Rxxxx Mxxx (M) Sdn Bhd using consignment note dated 11.7.2024. Based on Scheduled Waste Inventory for SW 409(PPE), the record is only from 31/01/2024 until 11/07/2024.</p>		

	There is no evident of SW409 (PPE) disposal record before the date. The management informed that previously the used PPEs were disposed by SS Sxxx Txxx Enterprise on dated 26/03/2024, 16/11/2023 and 04/07/2023. However, there is no evidence of DOE License for SS Sxxxx Txxxx Exxxx as authorized SW collector.
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Monitoring SW inventory through E-Swiss system effective 11 July 2024 and PIC able to identify the correct vendor to dispose SW inventory thoroughly E-Swiss system.</li> <li>2. Estate Management has sent PIC of SW i.e. store clerk to attend training provided by DOE Kluang related to SW and E-Swiss system on 18 July 2024.</li> </ol>
<b>Root Cause Analysis:</b>	No CEPKWAMP competent person available at the estate and PIC i.e. store clerk for SW procedure has never attended any training related to SW.
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. OU to send PIC especially staff level that permanently at OU for CEPKWAMP training.</li> <li>2. RHSE will monitor regional competent person availability and to replace / sent pic for the said training. RHSE will sent the list of competencies to RHR.</li> </ol>
<b>Assessment Conclusion:</b>	CAP has been reviewed by the auditor and found satisfactory. Implementation of the CAP will be reviewed during the next surveillance audit.

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
<b>OFI 1</b>	<p><b><u>Indicator 3.3.3</u></b></p> <p>Monitoring of water abstraction can be further improved by ensuring competency of the person in charge to maintain compliance to requirement stated in License for Abstraction water #BAKAJ/334/300/05/07/08/15</p>

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

**3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement**

Previous Audit Critical (Major) Non-conformity			
<b>NCR Ref #</b>	2365056-202306-M1	<b>Issued Date</b>	06/07/2023
<b>Due Date</b>	04/10/2023	<b>Closure Date</b>	21/08/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	6.7.3 (Major / Critical)		
<b>Statement of Nonconformity:</b>	PPE usage and Sanitation facilities for sprayers was not effectively implemented.		
<b>Requirement Reference:</b>	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
<b>Objective Evidence:</b>	During site visit at P22B Bukit Benut estate, spraying area use Chemical Tarang, it was found 2 workers was not wearing safety goggles as their PPE. It was not in line with recommendation from CHRA JH/04/04/18 Section 5.1.4 Use of Approved Personal Protective Equipment (USECHH 2000 Regulation 16) (4) Field Spraying – Mandor - & General Workers: Respirator with 3M, 3311K-55 organic vapour cartridge, safety goggles, nitrile gloves, safety helmet, wellington boots and apron. Other than that, it was found there is no evidence that clean water was available for sanitation purpose for Sprayers. It was not in line with recommendation from CHRA JH/04/04/18 Section 5.3.6 (2.) Emergency Showers and eyewash stations provide on the spot decontamination. In Additional stated in the SDS dated 15/07/2020, Section 4 First Aid Measures for required clean water for incident related Eye Contact, Skin Contact and Ingestion.		
<b>Corrections:</b>	Provided adequate PPE to the sprayer as per SOP and daily monitoring on the PPE before they off to field for spray operation. Prepared a box storage for clean water attached to spraying trailer to ensure clean water always available at the trailer at all times		
<b>Root Cause Analysis:</b>	Lack of enforcement by management and monitoring on the requirement of PPE before spraying operation (PPE, bringing clean water and necessity during spraying activity) including monitoring of the competencies of the mandore. Lack of supervision in activity ensuring workers put their PPE during working hour.		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. To educate and conduct retraining to Sprayer specifically on the Personal Protective Equipment (PPE) needed with training evaluation.</li> <li>2. Provide proper training to Mandore on the proper SOP for spraying operation for their awareness on safety measure with training evaluation.</li> <li>3. Appointment of PIC to monitor on the correct PPE usage for all workers including bringing of clean water before spraying operation and will impose e-Sime card.</li> <li>4. To add training evaluation and ensure the workers understand main purpose of training.</li> </ol> <p>Enforcement for mandore to ensure all sprayers put on correct PPE at work and to report any non-conforming practices for management take further action.</p>		
<b>Assessment Conclusion:</b>	Major NC Close Out		

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	<ol style="list-style-type: none"> <li>1. Retraining for Sprayer and Mandore with training evaluation has been conducted on 09/08/2023 &amp; 18/08/2023. Refer training record PPE Training to Sprayer and Spraying Mandore Bukit Benut Estate. Sighted evidence of training material, attendance &amp; photos.</li> <li>2. Sighted evidence of Appointment letter and enforcement letter to Mandore. Refer Appointment letter "Surat Perlantikan Untuk memastikan Penggunaan Peralatan Perlindungan Diri (PPE) Sepanjang Waktu bekerja".</li> <li>3. Sighted monitoring has been done by mandora to ensure all PPE was implemented using E-Sime Card. Latest monitoring sighted on 18/08/2023. Refer Monitoring record and QR E Sime Plus.</li> <li>4. Sighted evidence of PPE Issuance record to Sprayer dated 11/07/2023.</li> <li>5. Verification through interview with Mandore and Sprayers has been conducted at Field P2023A found all sprayers was equipped with adequate PPE. Clean water with soap has been provided. Other than that, sighted portable emergency eyewash and first aid box has been placed there.</li> <li>6. Interview with estate management confirmed that correction and corrective action has been implemented.</li> </ol> <p>Based on the above evidence, the major non-Conformity is closed effectively on 21/08/2023. Continuous implementation will be further verified in the next assessment.</p>
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	<p>As per verification, there is evidence that all mandora and sprayer has been trained for chemical handling for each operating units. Interview conducted confirmed that all of them can demonstrates their understanding on the procedure.</p> <p>PPE issuance records for sprayers has been verified and it has been further confirmed during site visit where all the sprayers are using appropriate PPE. Sighted clean water and soap has been provided for in case of emergency. Hence, Major Non-conformities raised during the previous audit remain closed.</p>

Previous Audit Minor Non-conformity			
<b>NCR Ref #</b>	2365056-202306-N1	<b>Issued Date</b>	06/07/2023
<b>Due Date</b>	12/07/2024	<b>Closure Date</b>	12/07/2024
<b>Indicator &amp; Category (Critical / Minor)</b>	3.3.2 (Minor)		
<b>Statement of Nonconformity:</b>	Monitoring of first aid box checklist was not effectively implemented.		
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures is in place.		
<b>Objective Evidence:</b>	During first aid box inspection at Lambak Elaeis Estate, 5 first aid box was inspected at various workplace. Inspection of first aid box has been done latest on 03/07/2023. Refer "Buku Rekod First Aid". Checking on first aid box No 1 and No 11 found that the items stored in the first aid box was not accordance with Recommended Contents Of A First Aid Box. Refer First Aid in Workplace Procedures dated 09/03/2021 with reference number UM/HSE/OCP/01 Section 7.3.5 Recommendation Contents in First Aid Box/Kit (18 items).		

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<b>Corrections:</b>	<p>The new person in-charge immediately follow new first aid checklist as stated SDP First Aid in Workplace Procedure dated 9/3/2021.</p> <ul style="list-style-type: none"> <li>- To add instruction letter from Manager to MA to follow SDP First Aid in Workplace Procedures dated 09/03/2021 immediately</li> </ul>
<b>Root Cause Analysis:</b>	<p>1. Medical Assistant (MA) does not aware on checklist for listing 18 items as Procedure UM/HSE/OCP/01. She was used a Guideline on First Aid in the Workplace 2<sup>nd</sup> edition 2004 as a guideline. The guideline was practiced by previous MA.</p> <p>The confusion of the checklist due to change of person-in-charge and she is newly appointed 03/02/2022 and just follow the continuation of previous MA which already resign 15/11/2021 (Guideline referred by the MA is First Aid in Workplace 2004) which is not standardized guideline by SDPB.</p>
<b>Corrective Actions:</b>	<p>The new person will streamline the SDP First Aid in Workplace Procedure 2021 Checklist for inspection in future.</p> <p>OU management to ensure latest guideline relevant to first aid management is being implemented and monitored by appointed PIC.</p> <ul style="list-style-type: none"> <li>- OU Management to put this as permanent agenda in HSE meeting - To add training for MA from HR pic or PIC for MA</li> </ul>
<b>Assessment Conclusion:</b>	<p>Sighted the instruction letter dated 09/03/2021 which has been provided to all person in charge for 1<sup>st</sup> aid and base on interview confirmed that all the PIC understand the instruction to comply with the procedure.</p> <p>Issues for 1<sup>st</sup> aid has been included in the HSE and verified base on the minutes meeting provided.</p> <p>MA has been trained by VMO on 1<sup>st</sup> aid training and base on interview confirmed that that MA can demonstrate his/her understanding.</p> <p>Thus, the evidence is sufficient to close the Minor Non-conformities.</p>

<b>Previous Audit Opportunity for Improvement</b>	
<b>OFI#</b>	<b>Description</b>
<b>OFI 1</b>	<p><b>OFI Statement:</b> <b><u>2365056-202306-I1</u></b> <b><u>Indicator: 7.2.9</u></b></p> <p>Verified availability of agreement for aerial spraying by Drone at Nursery Lambak Elaeis Estate. Refer Agreement on The Drone Aerial Spraying At Lambak Elaeis Estate dated 15/05/2023. Interview with management representative, the drone spray will be commenced once MXXXXXX AXXXXXX Sdn Bhd obtained their permit from CAAM. Further verification made by call to Mr Firdaus, Asst. Head Of MXXXXXX AXXXXXX Sdn Bhd confirmed operation yet to conduct at Lambak Elaeis Estate. In additional he informed that the permit progress in the final stage (already get approval by JUPEM). Refer correspondence email dated 13/03/2023 by ikwan@meraue.com stated that permit application process was in progress. OFI has been raised by the auditor as part of mechanism for auditor to verify during next audit.</p> <p><b>Verification / Follow-up actions:</b></p>

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	<p>Verified contract agreement with MXXXXXX AXXXXXX Sdn Bhd dated 01/04/2024. CAAM permit available issued by Pejabat Ketua Pegawai Keselamatan Kerajaan Malaysia dated 24/05/2024 reference CGSO.600-5/6/1 Jld.10 (48)s.</p> <p>Latest application on 04/07/2024 using Cypermethrin (2L), Antracol (1.5kg), Thiram (1kg), Sonata (250ml) and Bayfolan (500ml)</p>
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**3.3.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1930317-202007-N1	Minor	7.3.2	23/7/2020	Closed on 09/08/2021
1930317-202007-N2	Minor	7.3.1	23/7/2020	Closed on 09/08/2021
2134544-202111-N1	Minor	4.2.3	25/11/2021	Closed on 08/07/2022
2220976-202207-M1	Critical	7.2.7	08/07/2022	Closed on 15/09/2022
2220976-202207-N1	Minor	6.7.2	08/07/2022	Closed on 06/07/2023
2220976-202207-N2	Minor	2.2.2	08/07/2022	Closed on 06/07/2023
2365056-202306-M1	Critical	6.7.3	06/07/2023	Closed on 21/08/2023
2365056-202306-N1	Minor	3.3.2	06/07/2023	Closed on 09/07/2024
2520928-202407-M1	Critical	3.6.1	12/07/2024	Closed on 11/09/2024
2520928-202407-N1	Minor	7.3.1	12/07/2024	Open

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

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss SOU 22- Bukit Benut 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		
<b>Type of Stakeholder</b> (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	<b>Stakeholder name / organization</b>	<b>Means of communication</b> (e.g. face to face interview, email, phone interview, comment from public notice)

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Contractor	Txxx Xo XXXXXXXXXXXX Wxxxx	Face to face
Contractor	Sxxxxxxx Sxx Xxx Xxax	Face to face
Local Communities	Jawatankuasa Pembangunan dan Keselamatan Kampung (JPKK) Kxxxxxx Bxxxx Bxxxxx	Face to Face
Neighbouring Smallholder	Sxx Kxxx Exx	Face to face
School	SK Lxxxxx Xuxxx Xnxxx	Face to face
Sundry Shop	Xxxx Xax Xex	Face to face
Internal	Mill and Estate Workers (Local and Foreign)	Face to face
Internal	Gender Committee Representatives	Face to face
Internal	Union Representatives	Face to face

Stakeholders comment
<p><b>Feedbacks:</b> Contractor</p> <p>The contractor has a good relationship with the company where they have been providing the service for many years. The contractor also mentioned that the award of contract was done through fair and unbiased tendering process. Payments were always made on timely manner. The management and staff of the operating units have also been very accommodating should there be any issues of concern. The operating units also actively provide trainings on RSPO especially with regards to legal, OHS, best practices and employees' welfare. Although a few challenges were faced in implementing the requirements due to limited knowledge and resources, the contractors have stated that they will do their best to comply. They informed that they do not employed any child labour.</p> <p>The company has also always invited the contractor's representative to attend the stakeholder meetings as a channel to discuss any social issues. They were also made to understand the mechanism to lodge complaint or grievance should there be any. No issue with the management at this moment.</p>
<p><b>Audit Team verification and response:</b></p> <p>No further issue.</p>
<p><b>Feedbacks:</b> Local Communities</p> <p>Good cooperation given by estate management team. The management will help whenever they requested for help. Estate under SD Guthrie Berhad is known for offering job opportunity to the villager. No land encroachment from SD Guthrie Berhad estates. Demarcation of boundaries by the trenches, fencing and boundary stone were available. Estate provides access to the villagers using their roads for emergency cases.</p>
<p><b>Audit Team verification and response:</b></p> <p>No further issue.</p>
<p><b>Feedbacks:</b> School</p> <p>The representatives informed that the management from the estates and mill are very attentive and supportive. The management will assist whenever they requested for any assistance from the management. They have good relationship with the management. They also informed that no child labour was sighted in the estates. The management consistently contributes to school activities such as providing routes and facilities within the estate area for sports events. The teachers mentions that the estates operations do not disrupt learning or activity in the school.</p>
<p><b>Audit Team verification and response:</b></p>



No further issue.
<p><b>Feedbacks:</b> Estate and Mill Workers (Local and Foreign)</p> <p>Employment contract and payslip were provided, and the salaries deposited into workers bank account. Wages are paid according to Minimum Wages Order 2022. PPE is provided at no cost and can be replaced by making a request to the estate management. Foreign workers retain possession of their passports. Workers are aware of the complaint and grievance channels available to them. The management has been very accommodative to the workers in term of welfare. With regards to welfare, housing facilities, water &amp; electricity supply were always maintained in good conditions. With the use of OPP application in smartphone, the reporting of housing defects or maintenance was very convenient. There has been no issue with regards to delivering the terms &amp; conditions stipulated in the employment contract. Regular training on company’s SOP, policies, safety and health, environmental and social aspects were conducted by operating unit. All issues has been resolved and they also channel their complaints to the workers representatives in Social Dialogue.</p>
<p><b>Audit Team verification and response:</b></p> <p>No further issue.</p>
<p><b>Feedbacks:</b> Neighbouring Smallholder</p> <p>There are no issues with the management at the moment. His farms is located near the estate and has clearly demarcated boundaries, distinguished from the estate by trenches. There has been no encroachment on his land. Estate management given him permission to use the estate road for transport his harvested crops. The estate management also invited him to the annual stakeholder meeting.</p>
<p><b>Audit Team verification and response:</b></p> <p>No further issue.</p>
<p><b>Feedbacks:</b> Gender Committee Representatives</p> <p>They informed that no sexual harassment and violence cases reported since the last audit. Female workers understand the function of Gender Committee and aware the complaint mechanism if there are any issues occurred. They were treated equally without any discrimination by the management. The committee is tasked with planning annual activities for female workers to ensure a conducive living environment in the estate and during this activities they also can also know each other better, making easier to share any problems or thoughts. The management has also been very supportive with the programmes in term of financial, facilities and other resources. They were also informed that they are treated equally and given same opportunity as the male such as promotion as mandore in the estate.</p> <p>They were briefed on the new mother’s requirements for specific needs and consultation have been conducted by the management. They informed that those who handle chemical found pregnant will be transferred to other job stations that do not hazard to the worker. They allow to go back for breastfeeding during working hour in case they need.</p>
<p><b>Audit Team verification and response:</b></p> <p>No further issue.</p>
<p><b>Feedbacks:</b> Union Representatives</p> <p>They informed that there are no outstanding issues with the estate and mill management. Regular meetings between the management and NUPW committee are conducted to address any matter arising from the workers. Worker’s welfare including housing, salary payment and benefit are well taken care of by the estate and mill management. They also informed that the management did not involve in the selection of NUPW representatives. All representatives are elected by workers. Management provides a place for election process. NUPW will issue appointment letter to the union representatives and copy to management as for information.</p>
<p><b>Audit Team verification and response:</b></p> <p>No further issue.</p>
<p><b>Feedback:</b> Sundry Shop</p>



He informed that in general, there are no complaints. Food prices are fixed based on market price of raw items/ingredients, and he displayed price of food and items sold in the grocery shops for price monitoring by estate/mill management. One challenge faced is workers leaving the company's employment and abscond with payment. However, the amount is not much. The management also provides good facilities for sundry shop. He aware on the requirement not to employed child labour.

**Audit Team verification and response:**

No further issue.

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not applicable					
Not applicable as the estates have undergone 2nd cycle of replanting.					

Previous land owner / user comment	
	<b>Feedbacks:</b> Not applicable as the estates have undergone 2nd cycle of replanting.
	<b>Audit Team verification and response:</b>

**3.5 Impartiality and conflict of interest**

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

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

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that SOU 22- Bukit Benut Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&amp;C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that SOU 22- Bukit Benut Oil Mill is remain certified.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name: Mohd Razaleigh bin Mohamad</b>	<b>Name: Shylaja Devi Vasudevan Nair</b>
<b>Company Name: BSI Services Malaysia Sdn. Bhd</b>	<b>Company Name: SD Guthrie Bhd</b>
<b>Title: Client Manager</b>	<b>Title: Head, Sustainability Compliance Unit, Group Sustainability Dept.</b>
<p><b>Signature:</b></p> 	<p><b>Signature:</b></p> <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
<b>Date: 12/07/2024</b>	<b>Date: 26/08/2024</b>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance
<b>Principle 1: Behave ethically and transparently</b>		
<b>Criterion 1.1:</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1	<p><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Critical (Major) compliance -</p> <p>The documents that are specified in the RSPO P&amp;C were made available on site upon request at all the sampled operating units. Management documents related to sustainability available at each operating units visited during the audit upon request including land titles, OHS plans, EIA and SIA reports, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, summary reports, company policies and continual improvement plans as well as management actions plans. Furthermore, annual sustainability report, sustainability policies, Human Right Charter documents, company statement and global documents are published in the company's website; <a href="https://www.sdguthrie.com/sustainability/reports-policies-and-statements/">https://www.sdguthrie.com/sustainability/reports-policies-and-statements/</a> . The website is found accessible for public user.</p> <p>For each operating units, it has been verified based on the management systems has been established through procedure which each operating units need to respond of any information request received. Each operating units need to verify and justify each request base on types of concerns, Process request has been stipulated in the Standard Operating Manual (SOM) subsection 5.5; Procedure for external communication, dated 01/04/2008. Ither than that, policy and procedure were found displayed at office notice board, workstation, and worker quarters.</p>	Complied

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<p>1.1.2</p>	<p>Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -</p>	<p>Information is available in appropriate languages and accessible to relevant stakeholders (including internal and external stakeholder), provided through stakeholder meeting and social dialogue latest conducted at each specific operating unit. Stakeholder bulletin (i.e., complaint and grievance procedure, fire prevention, policies and RSPO requirements) and social dialogue reinforcement were discussed in the meeting with internal and external stakeholders. The meeting was given in by representative form each operating unit in Malay language which is understand by the relevant stakeholder. This has been verified through interview with sampled stakeholder conducted during the audit. Furthermore, information (in bi-lingual English and Malay) can be seen in the strategic area within estate and mill compound. Latest stakeholder meeting combining all estates and mill under SOU 22 Bukit Benut was conducted on 26/03/2024, while for social dialogue, latest session was conducted at each operating unit as below:</p> <table border="1" data-bbox="1137 895 1930 1093"> <thead> <tr> <th>Estate/Mill</th> <th>Date of Social Dialogue</th> </tr> </thead> <tbody> <tr> <td>Lambak Elaeis Estate</td> <td>26/06/2024</td> </tr> <tr> <td>Bukit Benut Estate</td> <td>03/05/2024</td> </tr> <tr> <td>Bukit Benut POM</td> <td>24/06/2024</td> </tr> </tbody> </table>	Estate/Mill	Date of Social Dialogue	Lambak Elaeis Estate	26/06/2024	Bukit Benut Estate	03/05/2024	Bukit Benut POM	24/06/2024	<p>Complied</p>
Estate/Mill	Date of Social Dialogue										
Lambak Elaeis Estate	26/06/2024										
Bukit Benut Estate	03/05/2024										
Bukit Benut POM	24/06/2024										
<p>1.1.3</p>	<p><b>(C)</b> Records of requests for information and responses are maintained. - Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has developed Standard Operation Manual (SOM) – Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 01/04/2008 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the estate. While for procedure related for internal stakeholder was documented in the Sustainable Plantation Management System, Appendix 5, version 1 dated 01/11/2008</p>	<p>Complied</p>								

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		<p>under section Flowchart and Procedures on Handling Internal Issues.</p> <p>Timeframe for internal and external communication to provide feedback within two weeks from the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation.</p> <p>The management have communicated the information to the relevant stakeholders during stakeholder meeting. Latest stakeholder meeting combining all estates and mill under SOU 22 Bukit Benut was conducted on 26/03/2024.</p> <p>In addition, the management has established a mechanism as per Standard Operating Manual (SOM) said above for the relevant stakeholder to request estate and mill information. Should there be any request for information that are specified in the RSPO P&amp;C from any stakeholders, record of request can be maintained in few ways such as Communication Logbook, and filing of correspondence documents e.g., email printout, and letter. There has been no request for information that are specified in the RSPO P&amp;C from any stakeholders since the last assessment.</p>	
1.1.4	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established Estate Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, Procedure for External Communication, version 1, issue date 01/11/2008). The procedure has the detail about the process of handling complaints from stakeholders and the time frame for external communication to be dealt with. The time frame to provide feedback is within two weeks of the date of receipt for communication and within one week of the completion of the investigation. On top of the existing procedure, Grievance Response</p>	Complied

		<p>Standard Operating Procedure, version 2 dated 18/07/2022 established for handling grievance specific issues for internal and external stakeholders.</p> <p>All the above procedure has been communicated to the relevant stakeholder at each operating unit during stakeholder meeting. Latest stakeholder meeting combining all estates and mill under SOU 22 Bukit Benut was conducted on 26/03/2024. Among the attendees were smallholders, local communities, government agencies, contractors, and representatives from nearby schools. Feedbacks was recorded in the minutes of meeting.</p> <p>In addition, each operating unit has appointed a person responsible for handling any social issues to ensure the effective implementation of the procedures. The Mill Manager has appointed Mill Assistant Manager as the management system officer to handle any issue related to social. Whereas the Senior Assistant Manager have appointed the to be in charge of social issues as evident in appointment letter signed by Estate Manager for respective estates.</p>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>List of stakeholders for internal and external parties maintained up to date as of 07/2024 at each visited operating unit and found listed stakeholder from various categories such as government/statutory bodies, contractor, local communities, contractors, and supplier. The stakeholder list is listed information on the name of stakeholders, contact name, address, and contact number.</p>	Complied
<p><b>Criterion 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has addressed its policy for ethical conduct in Code of Business Conduct (COBC) and to be implemented in all business operations and transaction, including recruitment and contracts. The document is publicly available on the company's website. In the Code of Business Conduct (COBC), dated 02/2023, it mentions on</p>	Complied

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		<p>core values and the way that the SD Guthrie Berhad conduct the business. The business principles applied are as follows:</p> <ul style="list-style-type: none"> <li>• Health, Safety and Environment</li> <li>• Compliance</li> <li>• Working with Local Communities</li> <li>• Fair Business Practices</li> </ul> <p>Section 7 of the COBC states that ethics and management practices should be align with standard of ethical behaviour such as avoiding conflicts of interest, guarding against bribery and corruption, no gift policy and prohibits any form or usage of corporate hospitality to influence business decision, donations and sponsorship, protecting group assets, accuracy of records of business transactions and financial information, proprietary and confidential information, personal data protection and competition and antitrust laws.</p> <p>SD Guthrie has imposed the implementation of the COBC to all its contractors and vendors by signing the Vendors Integrity Pledge (VIP) document. Copies of the signed pledges were kept by all the operating units and made available for verification.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>At the operating unit level, the system to monitor is mainly involves regular check of contractors' legal compliance and employees' welfare by the management. A Contractor and Vendor Checklist was developed, and among of checklist items is to monitor compliance and the implementation of the policy and overall ethical business practice. Each operating unit conducts due diligence process using the checklist on monthly basis.</p> <p>Apart from that, annual internal audit is also one of the methods to ensure that management is effectively monitoring the compliance and policy implementation by the counterparties. Internal audit for RSPO requirements and financial implementation (finance internal</p>	Complied

		audit) is conducted to ensure the policy and procedure of the company is implemented.	
<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p><b>(C)</b> The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad SOU 22 Bukit Benut POM Certification Unit continues to comply with all verified legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and HQ. The sampled mill and estates had obtained and renewed license and permits as required by the law. Among others the licenses/permit verified were:</p> <p><u>Bukit Benut Estate:</u></p> <ol style="list-style-type: none"> <li>1. MPOB License #522307002000 valid from 01/08/2023 until 31/07/2024</li> <li>2. Diesel permit #PBKB/2023/P/J-000210 valid from 15/08/2023 until 14/08/2025</li> <li>3. Air Receiver #JH PMT 22514 valid until 19/12/2024</li> <li>4. Deduction wages permit #PP3/29/377/2006 from JTK dated 30/11/2006</li> </ol> <p><u>Lambak Elaeis Estate:</u></p> <ol style="list-style-type: none"> <li>1. MPOB License #518641002000 valid from 02/07/2024 until 01/06/2025</li> <li>2. Diesel Permit #BL22013031402 valid from 15/08/2023 until 14/08/2025</li> <li>3. Air Compressor Receiver #JH PMT 11573 valid until 20/05/2025</li> <li>4. Permit for Overtime work #BHG.PU/9/134JLD9(11) by JTK dated 27/03/2017</li> </ol>	Complied



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		<p>5. Weighbridge calibration #B1809951 inspected by De Metrology dated 13/09/2023</p> <p><u>Bukit Benut POM:</u></p> <ol style="list-style-type: none"> <li>1. MPOB Licence #528154004000 valid from 26/06/2024 until 31/03/2025</li> <li>2. Jadual Pematuhan DOE Licence #004747 with reference file valid from 01/07/2024 to 30/06/2025</li> <li>3. Steam Receiver #PMT 43561 valid until 09/06/2025</li> <li>4. Boiler #PMT149190 valid until 09/06/2025</li> <li>5. License for Abstraction water #BAKAJ/334/300/05/07/08/15 valid until 31/12/2024</li> <li>6. Energy Commission Electricity permits #ST(SJB)P/S/JHR/01935 Serial No: 006931/2022 valid until 29/07/2024.</li> <li>7. Weighbridge with serial number C015286546, Sticker number DE18005104 inspected on 23/11/2022.</li> <li>8. Competence person CePSWaM #CePSWaM/2319473 to Assistant Engineer NRIC 9712XX-XX-XXXX date 16/01/2024.</li> <li>9. Competence person CePPOME #CePPOME/2318878 to Assistant Engineer NRIC 9008XX-XX-XXXX.</li> <li>10. Competence Person AGT #NW-SRO-AGT-0759-U dated 09/09/2022</li> <li>11. Weighbridge calibration #D127589 inspected by De Metrology 06/11/2023</li> </ol>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>The operating units have maintained compliance with legal requirements through established and implemented documented procedures, as outlined in the Estate/Mill Quality Management System, Level 2: Standard Operating Manual, specifically Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10</p>	Complied

		<p>December 2008. This mechanism ensures adherence to legal and other requirements and is documented in the EQMS &amp; MQMS (Estate &amp; Mill Quality Management System), which is distributed to all operating units. The Group Sustainability Department and respect (formerly known as GSQM department) tive operating units are responsible for identifying, managing, updating, and tracking legal requirements, as well as monitoring legal compliance status.</p> <p>Furthermore, all operating units maintain a Legal &amp; Other Requirements Register (LORR) that covers all necessary regulatory requirements. A legal register dated June 2024 lists additional applicable laws, including:</p> <ul style="list-style-type: none"> <li>• Minimum Wages Order 2022</li> <li>• Fire Service Act 1988 (Act 341) Amendment 2020</li> <li>• Human Resources Development Act 2001</li> <li>• Anti-Sexual Harassment Act 2021</li> <li>• Employees’ Social Security (Amendment) Act 2022</li> <li>• Employees’ Insurance System (EIS) (Amendment) Act 2022</li> <li>• Control of Supplies Act 1961</li> <li>• Employment (Amendment) Act 2022</li> <li>• Occupational Safety and Health (Plant Requiring Certificate Of Fitness) Reg. 2024</li> </ul>	
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Legal or authorized boundaries are clearly marked and visibly maintained, as verified during a site visit. When land boundaries adjoin those of third parties (such as smallholders, villages, other oil palm companies, etc.), the standard practice at the sample estate is to indicate these legal boundaries through the construction of</p>	Complied

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		<p>trenches and perimeter roads. This was confirmed during field visits to Bukit Benut Estate and Lambak Elaeis Estate, where the practice was clearly observed. Boundary and monthly patrol records were also verified.</p> <p><b>Bukit Benut Estate:</b></p> <p>The boundary at P10B2, neighboring smallholders, and P14B1, also neighboring smallholders, was inspected. It was verified that there is no planting beyond these legal or authorized boundaries.</p> <p><b>Lambak Elaeis Estate:</b></p> <p>The boundary at P09A, neighboring a Tong Tor Residential Area, and P00A, neighboring Kluang Estate, was inspected. It was verified that there is no planting beyond these legal or authorized boundaries.</p>	
<p><b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>Each operating unit within SOU 22 Bukit Benut maintains its own stakeholder list, which includes a comprehensive record of contracted parties. These stakeholder lists were updated on 07/2024. Information such as names and addresses of the contractors, as well as the contact person for each contractor. The lists were made available for verification at all the sampled units.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established Contractor &amp; Vendor Management Procedures, dated 17/11/2021. The objectives of the procedures are as below:</p> <ul style="list-style-type: none"> <li>To define the procedure for managing the overall contractor’s workers throughout Upstream Malaysia operations which includes provisions for safety, health, social, security, environmental, governance and legal compliance.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• To provide guidance to Management on the processes of selecting and monitoring of C&amp;V.</li> <li>• To protect the safety &amp; health of employees &amp; other people at workplace.</li> <li>• To ensure only C&amp;V with acceptable standards are allowed to do business &amp; work within SOU 22 Bukit Benut</li> </ul> <p>The contract agreement/letter of award contains specific clauses on meeting applicable legal requirements which stated under Compliance with applicable laws and guidelines.</p> <p>Based on the samples contracts reviewed at each visited operating unit, there is a Vendor Integrity Pledge (VIP) comprising the Vendor Code of Business Conduct (VCOBC), covering aspects such as human rights, environment, safety and health and ethic and management practices.</p> <p>All contracted parties/vendors were required to sign Vendor Integrity Pledge (VIP) and adhere to the following requirements:</p> <ul style="list-style-type: none"> <li>- Vendor Code of Business Conduct (VCOBC)</li> <li>- All applicable laws and regulations related anti-bribery, fraud, and corruption.</li> </ul> <p>VCOBC includes a statement mandating that contracted parties/vendors comply with all laws and regulations in the countries where SD Guthrie Berhad operates.</p> <p>The operating units has conducted legal due diligence of all their contracted parties through internal audits, and performance review. Each operating unit maintains Contractor Master List which containing documents such as workers contractor list, payslip, EPF Form A, SOCSO contribution form, passport/permit, employment contract. The Contractor Master List were found updated on monthly basis. In addition, operating unit under SOU 22 Bukit Benut</p>	
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		<p>has conducted due diligence for the contracted parties using Checklist of Contractor and Vendor (ILO Checklist), which includes the following:</p> <ul style="list-style-type: none"> <li>- Documentation and records: Photocopy documents of contractor/vendor workers, monitoring validity workers documents at least once a month, ensure to keep copy of Vendor Integrity Pledge signed by the contractor/vendor.</li> <li>- Key Performance Index (KPI) and Vendor Performance Evaluation (VPE): KPI carried out by operating unit on monthly basis and VPE annual report to be conducted once a year or during renewal process. KPI and VPE are based on Appendix 2 and 3 of the Contractor &amp; Vendor Management Procedures (Date Approved: 17/11/2021)</li> <li>- Contractor/vendor workers must be aware on grievance mechanism, freedom of movement and OSH: Briefing to the workers of contractor at least once a year.</li> </ul> <p>Minimum requirement for employment contract for contractor/vendor workers: To verify valid employment contract which contains employment contract terms includes scope of work, location of working area, working hours, duration of employment, worker benefit, annual leave, sick leave, provision of PPE at no cost. Workers must understand the terms of employment contract.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established the Vendor Integrity Pledge and Vendor Code of Business Conduct (VCOBC). Reflecting to the indicator 2.2.2, all contracted parties/vendors were required to sign Vendor Integrity Pledge (VIP) and adhere to the following requirements:</p> <ul style="list-style-type: none"> <li>- Vendor Code of Business Conduct (VCOBC)</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- All applicable laws and regulations related anti-bribery, fraud, and corruption.</li> </ul> <p>The VCOBC contains clauses disallowing child, forced and trafficked labour. It can be sighted under:</p> <p>5.7 Eradication of Exploitation - The Group endeavours to eradicate all forms of bonded and forced labour, slavery, human trafficking, and sexual exploitation by implementing International Labour Organisation (ILO) core labour standards and conventions. When supplying labour to perform work for the Group, Vendors shall refrain from using or facilitating any of the following activities:</p> <ul style="list-style-type: none"> <li>• The Vendors’ Employees are not charged with recruitment fees for the purpose of restricting free movement.</li> <li>• Original identification documents of the Vendors’ Employees such as passport or work permits are not retained involuntarily by Vendors.</li> <li>• Payment of the Employees’ salaries are not withheld or delayed beyond the extent permitted by applicable laws and regulations in the countries where the Vendors operate.</li> <li>• In addition, the Vendors shall ensure that recruitment of its Employees and workers are done via legitimate recruitment agencies, which are properly licensed to operate under applicable laws.</li> </ul> <p>5.8 Abolishment of Child Labor &amp; Protecting the Rights of Children – The Group seeks to promote the well-being of children and safeguard them from any form of maltreatment or exploitation, including but not limited to child sex tourism, child trafficking, and child pornography. As such, Vendors shall not employ anyone under the age of 18 or the applicable minimum legal age in the countries they operate, unless in vocational and/or formal and structured apprenticeship, educational and training programmes.</p>	
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		<p>Based on contract samples reviewed at each visited operating unit, it was found that the contractor has signed the VIP and the documents have been presented to the auditor for verification. This was also confirmed through interview with sampled contractor during the audit. Refer to the samples record of workers contractor list in Contractor Master List, no young workers hired by the contractor in SOU 22 Bukit Benut.</p>	
<p><b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.</p>			
<p>2.3.1</p>	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Bukit Benut POM operate under IP+MB model which only received FFB from own supply bases (SOU 22) which are Bukit Benut Estate and Lambak Elaies Estate. Other than that, Bukit Benut POM also received crop diversion from other certified operating units which under SD Guthrie Berhad. Information of FFB supplier as below</p> <p><b>Bukit Benut Estate</b>  MPOB Licences: 52230700200 expired on 31/07/2024  Geo-location- 1° 54' 40.70" N; 103° 19' 58.80" E</p> <p><b>Lambak Elaies Estate</b>  MPOB Licences: 518641002000 expired on 28/02/2025  Geo-location- 1° 58' 01.13" N; 103° 19' 35.58" E</p> <p><b>Cenas Estate</b>  MPOB Licences: 622344102000 expired on 30/11/2024  Geo-location- 1° 54' 49.70" N; 103° 34' 51.00" E</p> <p><b>Tun Dr Ismail Estate</b>  MPOB Licences: 518943102000 expired on 28/02/2025  Geo-location- 1° 45' 58" N; 103° 233' 38.00" E</p>	<p>Complied</p>

2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>Not applicable since there is no indirect FFB supplier. It has been verified based on the FFB received records, Interview with stakeholders and site visit at ramp and AP post.</p>	Not Applicable
<p><b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b></p>			
<p><b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The business plan for the mill is reflected in the form of an annual budget (MPLAN) and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilization rate and CAPEX.</p> <p>The business or management plan for the estates were presented in the form of annual budget (MPLAN) with 5 years projection (2023 – 2027). The annual budget contains the crop projection and the finance allocation for field operation and administration. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.</p> <p>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. In the 5 years business plan include items as follows:</p> <ul style="list-style-type: none"> <li>a) Palm oil mill <ul style="list-style-type: none"> <li>i. Mill intake – FFB input</li> <li>ii. Production of CPO</li> <li>iii. Production of PK</li> <li>iv. Total Palm Oil Extraction</li> <li>v. Total Palm Kernel Extraction</li> <li>vi. Mill cost</li> </ul> </li> </ul>	Complied



		<p>b) Oil Palm Estate</p> <ul style="list-style-type: none"> <li>i. Total crop projection and yield potential</li> <li>ii. Activity direct cost             <ul style="list-style-type: none"> <li>a. Mature upkeep</li> <li>b. Manuring</li> <li>c. Harvesting and collection</li> <li>d. Transportation</li> <li>e. Nursery</li> </ul> </li> <li>iii. Estate administration             <ul style="list-style-type: none"> <li>a. Admin Cost</li> </ul> </li> <li>iv. Labour overhead</li> <li>v. Road and bridges</li> <li>vi. Cost of production.</li> </ul> <p>The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2027) and well documented upon request.</p>	
<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.            - Minor compliance -</p>	<p>Annual replanting program is available and verified. Details as per below</p> <p><b>Lambak Elaeis Estate</b></p> <p>Replanting programme sighted as follow</p> <p>2024- 90.04Ha            2025- 69.56Ha            2026- 138.79            2027-133.05Ha            2028- 161.55Ha</p>	<p>Complied</p>

		<p><b>Bukit Benut Estate</b>          Replanting programme sighted as follow          2024-85.78Ha          2025- 111.98Ha          2026- 104.69Ha          2027-108.56Ha          2028- 132.11Ha</p>	
<p>3.1.3</p>	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.          - Minor compliance -</p>	<p>Bukit Benut POM Operating Unit held management reviews at their respective sites on a yearly basis. Among the matters discussed during the management review are as follows: -</p> <ol style="list-style-type: none"> <li>1. Results of Internal Audit</li> <li>2. Customer Feedback</li> <li>3. Status of preventive and corrective action plans</li> <li>4. Follow Up actions for management reviews</li> <li>5. Changes that could affect the management system</li> <li>6. Recommendations for improvement</li> </ol> <p>The minutes of the meeting indicated that Internal audit findings were each thoroughly examined, and the corrective action plan were discussed. The management review was conducted at the respective operating units as follows:          Bukit Benut estate: 20/05/2024          Lambak Elaeis Estate: 28/06/2024          Bukit Benut POM: 14/05/2024</p>	<p>Complied</p>

**Criterion 3.2:** The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.

<p>3.2.1</p>	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Continuous improvement has been established by the management which include both environment and social aspect. It has been verified base on the document provided. Details as per below,</p> <p><b>Lambak Elaeis Estate</b></p> <ol style="list-style-type: none"> <li>1. Using Geo Spraying, to reduce the usage of pesticides by planting of beneficial plant.</li> <li>2. Using Alion to reduce the total rounds of spraying</li> <li>3. Using fertilizer spreader to increase productivity</li> <li>4. Construct perimeter drain at the housing quarters</li> <li>5. Recycle chemical container for pesticides application.</li> </ol> <p><b>Bukit Benut Estate</b></p> <ol style="list-style-type: none"> <li>1. To extend application to construct the car porch pillar and perimeter fencing at Sekolah Rxxxx Axxxx Lxxx Bxxx Benut</li> <li>2. Contribution to local communities depending on consultation with stakeholders.</li> </ol> <p><b>Bukit Benut POM</b></p> <ol style="list-style-type: none"> <li>1. Report and rectify all the leakage if hydraulic and lubricating oil at all stations</li> <li>2. POM to support all the workers to attend some event or festival celebrations.</li> <li>3. Provide necessary development program to workers and staff such as skill and safety training</li> <li>4. Arrange for schedule waste disposal every 6 months or before total tonnage exceeds 20mt to licensed contractor.</li> </ol>	<p>Complied</p>
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3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p><b>PROCEDURAL NOTE:</b></p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>The Certification Unit has completed its RSPO metrics template version 2.1 and submitted it to the CB prior to this assessment. The input data was verified for accuracy based on the following records:</p> <ul style="list-style-type: none"> <li>• SAP accounting system</li> <li>• Land titles</li> <li>• Complaints &amp; grievance records</li> <li>• Department of Safety &amp; Health’s JKPP8 form</li> </ul>	Complied
<b>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</b>			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Standard Operating Procedures (SOPs) for the estate and mill has been established. SD Guthrie SOP issued dated 02/01/2008 and Agricultural Reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units as a guidance document to conduct estate operation. The estate also holds the Safety Work Procedure. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc.</p> <p>Palm Mill holds two SOPs: Sustainable Plantation Management System (SPMS) version 1 dated 1/11/2008 and Mill Quality Management System version 1 dated 1/11/2008 as a guidance document to operate the mill.</p> <p>For Health, Safety and Environment, both mill and estates, SD Guthrie has issued Health, Safety and Environment (HSE) Management System and Standard Operating Procedures. SD Guthrie continuously updated the SOP established. Among the updated SOP FY 2022 as follows:</p>	Complied

		<ol style="list-style-type: none"> <li>1. UM HSE Management System Manual, UM/HSE/MS/01</li> <li>2. First Aid in Workplace Procedure, UM/HSE/OCP/01</li> <li>3. Safety Harvesting Procedure, UM/HSE/OCP/02</li> <li>4. Personal Protective Equipment Procedure, UM/HSE/OCP/03</li> <li>5. Chemical Safety Management Procedure, UM/HSE/OCP/04</li> <li>6. Permit to Work (PTW) Procedure, UM/HSE/OCP/05</li> <li>7. OSH Risk Management Procedure, UM/HSE/SE/01</li> </ol>	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	A mechanism on checking the consistency of estate and mill implementation of their procedures were in place. Among the mechanism such as Performance Monitoring Visit, SORA/SCRA visit, Agronomist visit and Internal Audit.	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	<p>The operating units maintain all the records of monitoring and actions taken for all issues raised during the visit. Reviewed the monitoring records as follows:</p> <p><u>Bukit Benut POM</u></p> <ol style="list-style-type: none"> <li>1. Internal Audit Report: 14/05/2024.</li> <li>2. Structured oil recovery Assessment (SORA) Report dated 19-22/02/2024.</li> </ol> <p><u>Bukit Benut Estate</u></p> <ol style="list-style-type: none"> <li>1. Internal Audit Report dated 16/05/2024.</li> <li>2. Estate Structured Crop Recovery Assessment Report dated 14-21/02/2024.</li> </ol> <p><u>Lambak Elaeis Estate</u></p> <ol style="list-style-type: none"> <li>1. Internal Audit Report dated 15/05/2024.</li> </ol>	OFI

		<p>2. Estate Structured Crop Recovery Assessment Report dated 14-22/02/2024</p> <p>OFI</p> <p>Monitoring of water abstraction can be further improved by ensuring competency of the person in charge to maintain compliance to requirement stated in License for Abstraction water #BAKAJ/334/300/05/07/08/15</p>	
<p><b>Criterion 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting nor expending the existing ones conducted by each operating unit under SOU 22 Bukit Benut as of the date of the audit. No additional methods have been implemented or introduced in the operations of the mill and estate, which could potentially result in altered impacts on the social aspects. The social impacts arising from the mill and estate operations have remained consistent since last assessment.</p> <p>However, SOU 22 Bukit Benut has conducted a Social Impact Assessment (SIA) which is the report is made available to the audit team during the audit. The audit team observed that the assessment covers the whole Certification Unit covering the Bukit Benut POM, Bukit Benut Estate and Lambak Elaeis Estate whereby the assessment has been conducted on 16 to 19/05/2016 by Group Sustainability Department. The findings of the assessment have been classified into 5 different category which are good practices/findings, issues, complaints suggestion and other finding by stakeholders. Further verification also indicates that the assessment has focuses several key areas as follows (mention in attachment 1 of the SIA report):</p>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>• Housing/living condition</li> <li>• Health facilities</li> <li>• Environment impact (air/water quality)</li> <li>• Health condition due to work/task</li> <li>• Education (creche)</li> <li>• Entertainment facilities (playground, hall, etc.)</li> <li>• Working environment/condition (salary, etc.)</li> <li>• Relationship with management</li> <li>• PPE distribution</li> <li>• Training/information sharing</li> <li>• Annual event/celebration</li> <li>• Welfare (goods, donation)</li> <li>• Co-existence with migrant workers</li> <li>• Complaint/grievance procedure (complaint channel, etc.)</li> <li>• Union (annual meeting, efficiency)</li> <li>• Transportation (to school, nearby stores, emergency)</li> <li>• Harassment</li> </ul> <p>Following to the key areas assessed, the audit team observed that several issues has been identified, example are as follows:</p> <p><b>Bukit Benut POM</b></p> <ol style="list-style-type: none"> <li>1) Some complaints from workers that housing complaints are not attended in timely manner.</li> <li>2) housing complex.</li> </ol> <p><b>Bukit Benut Estate</b></p> <ol style="list-style-type: none"> <li>1) Management to organize annual social activities.</li> <li>2) Harvester having problem to change their damaged PPE.</li> </ol>	
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		<p><b>Lambak Elaeis Estate</b></p> <ol style="list-style-type: none"> <li>1) Bat intrusion at the houses and create comfortable odour at the ceiling.</li> <li>2) Safety when motorcyclist are speeding without lamp on the village road.</li> </ol> <p>Management plan has been established by each operating units and has been verified by the audit team. There is evidence that the management plan has been developed in participatory ways with the stakeholders. This has been verified during stakeholder consultation conducted with several stakeholder during the audit.</p> <p>Despite the above, there are good practices identified during the assessment that has been highlighted by the stakeholders, for example:</p> <ul style="list-style-type: none"> <li>• Relationship between workers from different nationalities, and between workers and management is good.</li> <li>• Management emphasizes strongly on safety and health. Workers and staff shows that they understood and accepted safety and health culture at workplace.</li> <li>• Payment procedures to suppliers and contractors are in place. Positive feedbacks are received from them regarding this matter.</li> </ul> <p>List of stakeholders met and interview during the assessment is made available in the report covering stakeholders' groups i.e., local workers, foreign workers, contractors, relevant government agencies and local communities residing within the vicinity of the Certification Unit.</p> <p>For the year 2023/2024, an Environmental Impact Assessment (EIA) was established to identify environmental aspects in all estate activities including the mill. This assessment was</p>	
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		<p>documented using Environmental Aspects Impacts Identification and Environmental Impacts Evaluation forms, covering all activities in the estates and mill. The EIA was conducted in accordance with established Standard Operating Procedures (SOP), as outlined in the SOP Standard Operating Manual, subsection 5.4: Planning, and Appendix 5.4.1b: Environmental aspect/impacts evaluation procedure. Sample of activity verified were:</p> <p>Estates</p> <ol style="list-style-type: none"> <li>1. Grass cutting</li> <li>2. Parking vehicle</li> <li>3. Herbicide spraying</li> <li>4. Maintenance station</li> <li>5. Store cleaning</li> </ol> <p>Mill</p> <ol style="list-style-type: none"> <li>1. Steriliser</li> <li>2. Boiler</li> <li>3. Laboratory</li> <li>4. EFB dumpsite</li> <li>5. Final discharge</li> </ol> <p>The plans and impact assessments relating to environmental impacts based on documents for both estates and the mill are elaborated in the following records:</p> <ul style="list-style-type: none"> <li>• Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, (version 1; year 2008 Issue no. 1; dated 1 April 2009 Register)</li> </ul>	
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		<ul style="list-style-type: none"> <li>Appendix 5.4.1c - Environmental Aspect and Impact Identification form (version 1; year 2008 Issue no. 1; dated 1 April 2009; MR-01/EIA)</li> <li>Appendix 5.4.1d – Environmental Impacts Evaluation form (version 1; year 2008 issue no. 1; dated 1 April 2009; MR-02/EIE)</li> </ul> <p>The monitoring on the impact of mill and estates activities has been verified and found in order.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Reflecting to the indicator 3.4.1, SOU 22 Bukit Benut has conducted a Social Impact Assessment (SIA) and the assessment covers the whole Certification Unit covering the Bukit Benut POM, Bukit Benut Estate and Lambak Elaeis Estate whereby the assessment has been conducted on 16 to 19/05/2016 by Group Sustainability Department. Among the methods used in the assessment were interviews with stakeholders, site observations and documentation reviews. The assessment had covered the affected stakeholders such as contractors, government authorities, local communities, and workers. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community, education, safety &amp; health, living condition, infrastructure and amenities and stakeholder engagement were taken into consideration in the assessment.</p> <p>For existing operation, the social impact management plans were developed and updated from time to time by each visited operating units. The updating of the management plan was based feedbacks and issues collected during various of meeting such as stakeholder meeting, social dialogue session, OSH meeting, trade union meeting, and complaint book. Social Impact Assessment Plan for year 2024 has been developed by each operating unit which</p>	Complied

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		<p>consists of list of issues, sources of issues, action plan, status, and person in charge.</p> <p>The SEIA, along with its management and monitoring plan, were continuously reviewed and updated with the participation of affected stakeholders, both internal among employees and external stakeholders, with the latest external stakeholder consultation meeting.</p> <p>The management already establish the environmental management plan for Mill / Estate base on EIA and EIE and also department of environment requirement (<i>Jadual Pematuhan</i>). The plan for environmental as per below:</p> <table border="1" data-bbox="1153 758 1926 1348"> <thead> <tr> <th data-bbox="1153 758 1422 813">Improvement issue</th> <th data-bbox="1422 758 1926 813">Action Plan</th> </tr> </thead> <tbody> <tr> <td data-bbox="1153 813 1422 997" rowspan="2">Waste reduction</td> <td data-bbox="1422 813 1926 901">To properly manage all usage of oil with proper tracking</td> </tr> <tr> <td data-bbox="1422 901 1926 997">Improve / rectify all the leaking hydraulic oil and lubricant oil at machinery</td> </tr> <tr> <td data-bbox="1153 997 1422 1268" rowspan="3">People</td> <td data-bbox="1422 997 1926 1085">Implement total productive maintenance and 5s activity in every station</td> </tr> <tr> <td data-bbox="1422 1085 1926 1173">Mill give support if worker need to do festival event</td> </tr> <tr> <td data-bbox="1422 1173 1926 1268">Mill management provide grievances platform for workers to complaint if any</td> </tr> <tr> <td data-bbox="1153 1268 1422 1348">Planet</td> <td data-bbox="1422 1268 1926 1348">Locate proper oil trap to avoid the chemical go into monsoon drain</td> </tr> </tbody> </table>	Improvement issue	Action Plan	Waste reduction	To properly manage all usage of oil with proper tracking	Improve / rectify all the leaking hydraulic oil and lubricant oil at machinery	People	Implement total productive maintenance and 5s activity in every station	Mill give support if worker need to do festival event	Mill management provide grievances platform for workers to complaint if any	Planet	Locate proper oil trap to avoid the chemical go into monsoon drain	
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	Store schedule waste at specific area that mill have prepared for it						
	Manage schedule waste that should be disposed by the authorized contactor for every 6 months						
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Management plan was review and updated regularly in a participatory way based on feedbacks and issues collected during various of meeting such as stakeholder meeting, social dialogue session, OSH meeting, trade union meeting, and complaint book. Social Impact Assessment Plan for year 2024 has been developed by each operating unit which consists of list of issues, sources of issues, action plan, status, person in charge and date of commenced. Verification during the audit found that there is evidence that all issues that has been highlighted in the social impact assessment and management plan that has been established has been implemented based on document review. It has been further confirmed through interview with sampled stakeholders that there are no repeating same issues for issues that has been highlighted in the assessment</p> <p>While for environment, the management plan, established based on operations with significant environmental impacts, undergoes annual review. It outlines environmental issues, mitigation actions, monitoring plans, and assigns responsibilities for implementation oversight. Among the plan established were:</p> <ol style="list-style-type: none"> <li>1. Environmental management plan</li> </ol>	Complied				

		<ul style="list-style-type: none"> <li>- To review EAI/EIE for any changes in operation</li> <li>- Create further awareness on recycling among workers through training</li> <li>- Monitoring of estate quarters</li> </ul> <p>2. Waste Management Plan</p> <ul style="list-style-type: none"> <li>- Maintain inventory of SW</li> <li>- Inventory for storage of SW</li> <li>- Put signages and centralised all the waste of scrap iron bay</li> </ul> <p>3. Pollution Prevention Plan</p> <ul style="list-style-type: none"> <li>- Ensure the preventive maintenance vehicles checklist were in place. Regularly inspection is carried out to these vehicles.</li> <li>- To place a tray under neath the vehicles</li> </ul> <p>4. Water Management Plan</p> <ul style="list-style-type: none"> <li>- Water supply to purchase from SAMB</li> <li>- Awareness of water consumption</li> <li>- To carry out immediately repair of broken pipelines and identify any leakages.</li> </ul> <p>5. IPM Management Plan</p> <ul style="list-style-type: none"> <li>- Intensive planting of beneficial plant</li> <li>- Fixing barn owl box achieve target ration 1:10</li> <li>- IPM Bagworm refreshment training</li> </ul>	
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Criterion 3.5: A system for managing human resources is in place.		
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has documented its employment procedures in two key documents, Migrant Worker Responsible Recruitment Procedure, dated 20/08/2021 and Guideline on the Recruitment of Local Workers, dated 07/12/2020. The purpose of this documents is to explain recruitment processes for both local and foreign workers including pre and post recruitment. Among other aspects, the procedure has outlined the selection, hiring, promotion, retirement, and termination of workers.</p> <p>As specified in the Migrant Worker Responsible Recruitment Procedure, SD Guthrie Berhad conduct selection and recruitment of migrant workers directly in the respective countries of origin. The recruitment of foreign workers will be carried out by the Workforce Management Unit (WMU) and HR department. WMU is responsible for conducting a briefing to potential workers on the job and provide the following information to the potential candidates during interview session:</p> <ul style="list-style-type: none"> <li>- Job requirements</li> <li>- Terms and condition of the work (e.g., wages, work hours, leave, benefit, safety, and health)</li> <li>- Policy</li> <li>- Grievance channels available</li> </ul> <p>After the interview, workers will also be questioned about whether they have encountered any unethical practice, deceptive processes, or intimidation from any party involved.</p> <p>Section 3.2 of the procedure also mentions that where there is a requirement to use the services of recruitment agents (vendor) in the origin country, company shall enter into partnership</p>

Complied

		<p>agreements to ensure the process recruitment managed by recruitment agents is transparent and follow the rules and standard required by the company. Other part mentions in the procedure are no charging of recruitment fees, transparent terms and conditions of employment in contracts, no withholding of passports or personal documents and grievance channels. The appendix in the procedure has summarizes the process flow of migrant workers recruitment from start of the recruitment process to the end.</p> <p>While for hiring local workers, section 4 of the Guideline on the Recruitment of Local Workers states that operating unit need to identify vacant positions in operations and request for necessary approvals to recruit new workers. Interested applicants are required to fill out an Application Form. They will be screened and shortlisted for an interview by Assistant Manager at the operating unit. During interview, the Assistant Manager is to brief the applicant the job, tasks, and expectations, in a language that they understand. List of successful applicant will be provided to the Manager for final approval for recruitment. Prior to commencing work, workers will be given an induction briefing and the briefing includes information on:</p> <ul style="list-style-type: none"> <li>- Employment contract terms and conditions</li> <li>- Company policies</li> <li>- Housing rules</li> <li>- General details on operations</li> </ul>	
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Based on interview with sampled workers and relevant stakeholder and documentation review, it was found that employment procedures as mentioned in indicator 3.5.1 were implemented and all the records are adequately maintained. Induction process is mandatory to be carried out by operating units to ensure company's</p>	Complied

		<p>rules and regulations were socialized and acknowledged by the workers.</p> <p>Induction briefing, fill out application form, medical checkup, interview session, briefing on salary, employment terms and conditions, as well as information about grievance channel were conducted as per required in the procedures established. This was confirmed during interview with sampled workers comprising both of foreign workers from different origin countries and local workers. During the audit, stakeholder consultation was conducted with several neighbouring operating unit and local community. It was noted that job vacancies, if any, would be advertised near the locations of the operating units.</p> <p>At the operating units, application forms, interview assessment form, medical check-up report, copy of identification documents and employment contract for newly recruited employees were made available for verification. These are among the pre-requisites outlined in the recruitment procedure.</p>	
<p><b>Criterion 3.6:</b> An occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) have established OSH Risk Management Procedure UM/HSE/SP/01 effective date 09//03/2021. Risks were identified and assessed in accordance with the established HIRARC an also incompliance to legal requirements as stated below.</p> <p>Lambak Elaeis Estate</p> <p>Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the</p>	<p>Non-compliance</p>



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		<p>estate. The Chemical Health Risk Assessment Report (Ref. Number: No:18/2023) conducted by Exxxx Cxxxx &amp; Exxxxx Plt (DOSH Registration: HQ/16/ASS/00/69) on 23/05/2023 was available for verification.</p> <ol style="list-style-type: none"> <li>1. Medical Surveillance were conducted in the estate based on the recommendation of the CHRA for workers exposed to hazardous chemicals. Results of annual medical surveillance were available in the estates for verification as follows.  The medical surveillance progmmme for the year 2024 has been performed on 14/05/2024 at Klinik Rengam for 19 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work.</li> <li>2. Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety &amp; Health (Noise Exposure) Regulations 2019 in the estates. The assessment was conducted on 02/09/2020 by Exxxxx Cxxxx &amp; Exxxx Plt. The assessment report (Ref. No: HQ/LPROYKPEB/21/00326) was available for verification.</li> <li>3. Audiometric Testing was done in the estate dated 19/12/2023- 23/01/2024 based on the recommendation provided in the Noise Risk Assessment in compliance with OSHA 1994 – OSH (NOISE Exposure) Regulations 2019. It was done on for 24 workers deemed to be exposed to excessive noise in the estate. The results indicated that 8 workers had abnormal audiogram, 4 workers with standard threshold sift. Retest has been conducted for the workers with STS on 15/02/2024.</li> </ol>	
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		<p>Bukit Benut Estate</p> <ol style="list-style-type: none"> <li>1. Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety &amp; Health (Noise Exposure) Regulations 2019 in the estates. The assessment was conducted on 02/09/2020 by Exxxxx Cxxxx &amp; Exxxx Plt. The assessment report (Ref. No: HQ/LPROYKPEB/21/00325) was available for verification. Additional Noise risk assessment has been done 19-20/06/2023) to include Mini tractor fertilizer applicator and mechanical buffalo conducted by Nxxxx Consultancy DOSH registration number HQ/22/PEB/00/00074 with report number HQ22/PEB/00/00074-2023-014</li> <li>2. Audiometry test has been conducted on 28-29/03/2024 which 2 workers has been identified has hearing abnormalities but not required for medical examination by OHD since there abnormalities is due to non-occupational.</li> <li>3. Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The Chemical Health Risk Assessment Report (Ref. Number: 21/2023) conducted by Exxxx Cxxxx &amp; Exxxx PLT (DOSHS Registration: HQ/22/ASS/00/00069) on 22/06/2020 was available for verification. Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The</li> </ol>	
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		<p>Chemical Health Risk Assessment Report (Ref. Number: HQ/15/ASS/00/363-2020-148 conducted by Nxxxx Consultancy (DOSH Registration: JH/04/04/318) on 25/05/2023 was available for verification</p> <p>4. Medical surveillance conducted on 22/06/2024, to Kxxxx Rxxxx and the result is still pending. Previous medical assessment conducted 04/08/2023</p> <p>Bukit Benut POM</p> <ol style="list-style-type: none"> <li>1. Chemical hazard risk assessment (CHRA) has been conducted on 08/05/2023 with report reference HQ/22/ASS/00/000052-2023/8 by Exxxxx Cxxxx &amp; Exxxx Plt DOSH registration number JHK 5149; JHK 2731.</li> <li>2. Noise risk assessment (NRA) conducted on 30/03/2024 report reference HQ/LYPROYKPEB/21//00291 conducted by Nxx Ixxxx Sxxxxx, Exxxx Cxxxxt &amp; Exxxxx Plt; NRA registration no; HQ/16/PEB/00/158 and additional assessment has been done 30/03/2024 with report reference NRA/KKS BUKIT BENUT/03/2024-01</li> <li>3. Audiometric assessment report year 2023 conducted 11/12/2023 for 6 workers which 2 workers has been identified as severe hearing losses. There is no requirement to retest as per assessor recommendation, both workers needs to be provided with PHP and annual audiometric test. For year 2024, audiometry test conducted on 24/06/2024 and the report is still pending.</li> <li>4. Medical surveillance conducted for all workers a per required in CHRA on 24/05/2023 DOSH registration number HQ/16/DOC/00/508 to Dr Lxx Cxxx Sxxxx, Kxxxx Axxxx. All workers has been identified as fit to work.For</li> </ol>	
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		<p>year 2024, assessment conducted on 27/05/2024 but the report is still pending.</p> <p><b>Major Non-conformities</b></p> <p>Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The Chemical Health Risk Assessment Report (Ref. Number: No:18/2023) conducted by Exxxxx Cxxxx &amp; Exxxx Plt (DOSH Registration: HQ/16/ASS/00/69) on 23/05/2023. Stated in the assessment report, fogging operator need to be included in the annual medical surveillance.</p> <p>Safe fogging procedure, 2021; clause 5.2; before fogging activities; 5.2.2; the fogger shall conduct medical surveillance on Organophosphate (OP) before conducting fogging activity. This will be focus on internal employee as in CHRA report recommendation for malathion or sumithion which are OP.</p> <p>Fogging activities has been conducted on 21-22/02/2024 by a workshop fitter, xxxx xxxxx xxx and latest medical surveillance has been done 01/05/2024 for manganese and did not include assessment for Cholinesterase. There is no medical surveillance has been conducted prior the operation. This is not inline with the SOP stated above.</p>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The Annual Health and Safety Plan for the estate and mill is primarily executed through the Annual Training Program 2023 and</p>	<p>Complied</p>

		<p>monitored via inspections to address identified health and safety risks. The focus is on ensuring safe work practices by providing:</p> <ul style="list-style-type: none"> <li>- Knowledge and skills needed to perform work safely and avoid creating hazards.</li> <li>- Awareness and understanding of workplace hazards, including identification, reporting, and control.</li> <li>- Specialized training for tasks involving unique hazards.</li> </ul> <p>In addition to formal classroom training, other methods such as on-the-job training and worksite demonstrations are used to effectively convey safety concepts, ensuring understanding of hazards and their controls, and promoting good work practices.</p> <p>The safety performance of each Operating Unit is monitored through:</p> <ul style="list-style-type: none"> <li>- Internal audits conducted by the Group Sustainability Department.</li> <li>- Work Site Inspections (WSI) by the site OSH Committee.</li> <li>- Direct involvement of supervisors and rounds by the Assistant Manager.</li> <li>- Safety incident reporting via Rapid4.</li> <li>- Health and medical surveillance.</li> <li>- Chemical exposure monitoring.</li> <li>- Audiometric monitoring.</li> <li>- Daily monitoring checklists, such as the PPE Checklist.</li> </ul>	
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		The results of these monitoring activities are discussed in meetings, communicated to employees, and appropriate corrective actions are taken when necessary.	
<b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units visited have conducted a training needs analysis for all employees, management, and contractors. This analysis was based on job designation and the training requirements specific to each job type.</p> <p>Trainings were identified for management, employees, and contractors and scheduled throughout FY 2024. The identified training covered safety and health, environmental, and social aspects.</p> <p>The methods implemented by SOU 22 certification units to assess participants' understanding included:</p> <ul style="list-style-type: none"> <li>a) Participants completing post-training evaluation/feedback forms and providing suggestions.</li> <li>b) Knowledge acquisition and behavioural application assessed by immediate supervisors at the workplace post-training.</li> </ul> <p>Random interviews with workers indicated that they understood the RSPO, various company and SDP policies, their job SOPs and the consequences of deviations, the importance of PPE and its proper use, the use of fire extinguishers, workplace hazards, risks and control measures, and safe practices.</p>	Complied
3.7.2	Records of training are maintained.	Sample of training records maintained as per below	Complied

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	<p>- Minor Compliance -</p>	<p>Bukit Benut POM</p> <ol style="list-style-type: none"> <li>1. Waste management &amp; HACCP- 08/06/2024</li> <li>2. Social dialogue training – 29/05/2024</li> <li>3. Training to contractor- 24/05/2024, 05/06/2024 and 18/06/2024</li> <li>4. PPE Training- 02/05/2024</li> <li>5. Induction of new workers- 04/12/2023</li> <li>6. Sharp tool briefing- 22/03/2024.</li> </ol> <p>Bukit Benut Estate</p> <ol style="list-style-type: none"> <li>1. Housing repair OPP training- 22/04/2024</li> <li>2. 10 Goldens Rule Training- 10/03/2024</li> <li>3. Beneficial plant training- 05/02/2024</li> <li>4. ERP Training- 29/03/2023</li> </ol>	
<p>3.7.3</p>	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Training for RSPO SCCS has been conducted on 08/06/2024 for all person incharge and as per interview, it has been confirmed that all the PIC can demonstrate their understanding on the SCCS requirements.</p>	<p>Complied</p>
<p><b>Criterion 3.8:</b> Supply chain requirement for mills (note: All supply chain requirements are considered as <b>Critical (C)</b>. However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
<p>3.8.1</p>	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p>	<p>Refer Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022 under section Glossary stated the meaning of RSPO Identity preserved as supply chain model assured that the RSPO certified oil palm product delivered to the end user uniquely identifiable to a single RSPO certified supply base. Refer document no. SD/SDP/GSD/SCCS/0522/01. FFB were obtained from all Sime Darby certified estates only. There was no</p>	<p>Complied</p>

	<p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>third party's crop nor non-certified FFB received by the mill. This was verified during the stakeholders meeting and site visit at mill.</p>					
3.8.2	<p><b>Mass Balance Module</b>  A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Bukit Benut POM is under Identity Preserved and Mass Balance module. Thus, this indicator is not applicable. The mill does not have any intention to accept and process any non-certified FFB, CPO or PK. All the FFB are supplied by its own certified supply base or other Sime Darby's certified estates on ad hoc basis. Thus, the palm oil content of its products is 100% IP-certified. The mill operate under MB and IP can classify and sell its IP-certified CPO or PK as MB-certified. It does not imply that the mill has the capacity to receive non-certified FFB and produce MB module CPO/PK and IP module CPO/PK separately.</p>	Complied				
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The 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.</p>	Complied				
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The registration of PalmTrace will be carried out by the Global Trading Department in HQ. Company has registered in PalmTrace system as follows:</p> <table border="1" data-bbox="1144 1257 1921 1359"> <tr> <td>Member name</td> <td>Bukit Benut Oil Mill</td> </tr> <tr> <td>Palm Trace ID</td> <td>RSPO_PO1000000194</td> </tr> </table>	Member name	Bukit Benut Oil Mill	Palm Trace ID	RSPO_PO1000000194	Complied
Member name	Bukit Benut Oil Mill						
Palm Trace ID	RSPO_PO1000000194						



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		<table border="1"> <tr> <td>Membership No</td> <td>1-0008-04-000-00 (SD Guthrie Berhad)</td> </tr> <tr> <td>Type of business</td> <td>Oil mill</td> </tr> <tr> <td>Licence status</td> <td>Active (05/11/2023 - 04-10-2024)</td> </tr> </table>	Membership No	1-0008-04-000-00 (SD Guthrie Berhad)	Type of business	Oil mill	Licence status	Active (05/11/2023 - 04-10-2024)	
Membership No	1-0008-04-000-00 (SD Guthrie Berhad)								
Type of business	Oil mill								
Licence status	Active (05/11/2023 - 04-10-2024)								
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.</li> <li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li> </ul>	<p>Documented in sustainable supply chain and traceability procedure for upstream document ID:SDP/GSD/202401/SCCS year 2024</p> <ul style="list-style-type: none"> <li>a) 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.</li> <li>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.</li> <li>c) Muhammad Aiman bin Ismail, assistant manager has been appointed as person in-charge for supply chain based on appointment letter dated 01/01/2024 signed the POM manager.</li> <li>d) Procedures for receiving and processing certified and non-certified FFBs were addressed in the sustainable supply chain and traceability procedure for upstream document ID:SDP/GSD/202401/SCCS year 2024;Section 7.0 Receiving FFB at the Mill.</li> </ul>	Complied						
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</li> </ul>	<p>Internal audit procedure document ID: SDP/GSD/SCU/IAP dated 10/01/2023</p> <p>Refer latest SCCS Internal Audit dated 14/05/2024. Based on the internal audit report and checklist, the elements of RSPO supply chain were adequately covered including the RSPO Market</p>	Complied						

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	<p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Communications and Claims elements. There was 1 OFI has been raised for SCCS which related to potential overproduction of CPO and PK based on current progress.</p> <p>Any non-conformity, corrective action will be established to rectify the lapse found. The status of the non-conformity shall also be discussed in the management review meeting. The management of Bukit Benut POM maintain the audit report. There is no corrective action required since there no- non conformities has been raised.</p>	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>Bukit Benut POM operate under IP+MB model which only received FFB from own supply bases (SOU 22) which are Bukit Benut Estate and Lambak Elaies Estate. Other than that, Bukit Benut POM also received crop diversion from other certified operating units which under SD Guthrie Berhad. Sample of weighbridge tickets as per</p> <p>Supplier: Bukit Benut Estate  Date: 17/04/2024  Weighbridge ticket number: 125336  Total: 10.34mt  Product: certified FFB- RSPO 591229</p> <p>Supplier: Lambak Elaies Estate  Date: 29/06/2024  Weighbridge ticket number: 127361  Total: 11.80mt  Product: certified FFB- RSPO 591229</p>	<p>Complied</p>

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		<p>Supplier: Tun Dr Ismail Estate  Date: 04/05/2024  Weighbridge ticket number: 125783  Total: 11.80mt  Product: certified FFB- CU- RSPO 863077</p> <p>Supplier: Cenas Ropel Estate  Date: 06/07/2024  Weighbridge ticket number: 127553  Total: 11.51mt  Product: certified FFB- CU- RSPO 863077</p> <p>Mechanism to handle non-conforming FFB and documents has been detailed up in the Procedure Sustainable Supply chain and Traceability Procedure dated 01/06/2022 Section 11.0.</p>	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> </ul>	<p>Sample taken as below</p> <ul style="list-style-type: none"> <li>a) Buyer address: Sxxx Dxxxx Oxx xxx; Lot 18283, Jalan Pulau Carey, 42960, Pulau Care, Selangor</li> <li>b) Seller address: Bukit Benut POM; KM 12, Jalan Mengkibol, 86009 Kluang, Johor</li> <li>c) The loading or shipment / delivery date;: 03/07/2024</li> <li>d) The date on which the documents were issued;:03/07/2024</li> <li>e) RSPO certificate number; RSPO 591229</li> <li>f) Product: Palm Kernel – RSPO IP</li> </ul>	<p>Complied</p>

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	<ul style="list-style-type: none"> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<ul style="list-style-type: none"> <li>g) The quantity of the products delivered: 29.56mt</li> <li>h) Any related transport documentation: Collection order PK No 068717</li> <li>i) A unique identification number: 011256</li> </ul> <p>Sample 2</p> <ul style="list-style-type: none"> <li>a) Buyer address: Sxxx Dxxxx Oxx; Lot 27, PT234, Lebu Sultan Mohamaed 1, Kawasan Perusahaan PKNS Fa</li> <li>b) Seller address: Bukit Benut POM; KM 12, Jalan Mengkibol, 86009 Kluang, Johor</li> <li>c) The loading or shipment / delivery date: 10/07/2024</li> <li>d) The date on which the documents were issued: 10/07/2024</li> <li>e) RSPO certificate number; RSPO 591229</li> <li>f) Product: Crude Palm Oil – RSPO IP</li> <li>g) The quantity of the products delivered: 39.30mt</li> <li>h) Any related transport documentation: Collection order PK No 488024</li> <li>i) A unique identification number: 011256</li> </ul>	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> <li>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</li> <li>ii) The mill shall ensure the following: <ul style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> </ul> </li> </ul>	<p>Outsourcing activities only for CPO and PK transport. Contract agreement verified as follows</p> <p>Company: xxx xxxx xxxxxx Sdn Bhd  Transporting Palm Kernel and Palm Kernal Expeller  Date of agreement: 26/07/2023  Reference number: T/H_SDPB/0721/001</p>	<p>Complied</p>

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	<p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>Company: xxx xxxx xxxxxx Sdn Bhd          Transporting Services for crude palm oil          Date of agreement: 23/02/2024          Reference number: T/H_SDPB/0721/001</p>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	The names and contact details of transporters responsible for the physical handling of RSPO certified oil palm products were documented and registered in the mill supplier database system. The independent third parties involved in mill operations are limited to transportation services for CPO and PK.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	No new contractors are being used for handling certified CPO and PK. According to Section 13.5 of the procedure, "The mill shall inform outsourced contractors in advance if an audit is deemed necessary by Certification Bodies (CB) and ensure that the contractors provide the CBs with relevant access to their operations, systems, and any required information, given prior notification."	Complied
3.8.12	<p>Record keeping</p> <p>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.</p>	Addressed in the Sustainable Supply chain and Traceability Procedure dated 01/06/2022 Section 5.0 Control of Documents & Records.	Complied

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<ul style="list-style-type: none"> <li>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</li> <li>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</li> <li>iv) For Mass Balance Module, the mill:             <ul style="list-style-type: none"> <li>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</li> <li>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</li> <li>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</li> </ul> </li> </ul>	<p>Bukit Benut POM has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.</p> <p>As per the RSPO Supply Chain – Module: Identity Preserved (IP) procedure, the records retention for RSPO Supply Chain related records and reports to be retained for a minimum of 3 years’ period. Sampled records of FFB weighbridge tickets and daily production records for last 3 years were still in place for verification.</p> <ul style="list-style-type: none"> <li>i. All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible.</li> <li>ii. The retention period for maintaining the traceability records is 3 years as stated in the Sustainable Supply chain and Traceability Procedure dated 01/06/2022 Section 5.4.</li> <li>iii. The material and products movement on real-time basis is recorded in “Month End Production Report” for both CPO and PK. The data is summarised in CPO/PK Mass Balance Calculation Among the information available in the format is date, FFB processed, OER, CPO amount (opening, produced and closing) and transferred CPO (mill weight, refinery weight).</li> <li>iv. Not Applicable since the model use was IP and For the outgoing CSPO/MB &amp; CSPK/MB recording purposes, the management will incorporate the record in the existing “Month End Production Report” excel sheet. Based on the review, by using mock data, it is confirmed that the record is capable to meet the purposes.</li> </ul>	
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3.8.13	<p><b>Extraction Rate</b></p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Verified OER and KER as below.</p> <table border="1" data-bbox="1153 443 1926 550"> <thead> <tr> <th>Month</th> <th>OER</th> <th>KER</th> </tr> </thead> <tbody> <tr> <td>Jul 2022 – June 2023</td> <td>19.50</td> <td>5.19</td> </tr> </tbody> </table>	Month	OER	KER	Jul 2022 – June 2023	19.50	5.19	Complied
Month	OER	KER							
Jul 2022 – June 2023	19.50	5.19							
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Bukit Benut POM derives the extraction rates based on the actual extraction rate produced in the mill. Therefore, the accuracy is continuously maintained.</p>	Complied						
3.8.15	<p><b>Processing</b></p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Based on the announcement summary, all the registrations were found to be in order. No RSPO volume sold for other scheme. RSPO certified volume only downgraded to conventional CPO/PK. Refer Sustainable Supply chain and Traceability Procedure dated 01/06/2022. From the record verification no outsider FFB accepted in Bukit Benut POM. The FFB source only from supply base and under parent company which is also certified estates.</p>	Complied						
3.8.16	<p><b>Registration of Transactions</b></p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p><b>Registration of transactions</b></p> <p>i) The registration of PalmTrace is carried out by the Sime Darby's Global Trading Department, HQ. All transaction has been registered in the PalmTrace.</p> <p>ii) Removal of certified product has been done 29/10/2023 for CSPO and 30/10/2023 for CSPK</p>	Complied						
3.8.17	<p><b>Claims</b></p>	<p>RSPO trademark was not used. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied						

	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.		
<b>General corporate communications</b>			
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.	SD Guthrie Berhad website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil. The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications.	Complied
4.2	In corporate communications, a member is allowed to: A. display its RSPO membership status B. display the RSPO web address (www.rsपो.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	SD Guthrie Berhad website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil.  The website had not displayed the RSPO website and had not display any RSPO Trademark.	Complied
4.3	Members are <b>not allowed</b> to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	No evidence of RSPO corporate logo used by Bukit Benut POM and verified through document and site review (notice board, business card, shipping documentation, etc.	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.	The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications and selling of its oils are considered RSPO certified.	Complied
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: <ul style="list-style-type: none"> <li>• “We have been sourcing RSPO certified palm oil since (YEAR).”</li> </ul>	In the SD Guthrie Berhad (Formerly known as Sime Darby Plantation’s) (SDP) 2021 Sustainability Report ( <a href="https://sdguthrie.com/wp-content/uploads/2022/04/SDP-SR-2021_20220429.pdf">https://sdguthrie.com/wp-content/uploads/2022/04/SDP-SR-2021_20220429.pdf</a> ), SD Guthrie that the management has made statements that highlight their RSPO certification status and	Complied



	<ul style="list-style-type: none"> <li>• “We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year.”</li> <li>• “We have been RSPO certified since (YEAR).”</li> <li>• “We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil.”</li> <li>• “In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified.”</li> <li>• “Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits.”</li> <li>• “We are RSPO certified. Ask us for our RSPO certified products.”</li> </ul>	<p>product-related claims in their corporate communication tools which complied with the requirement of RSPO Market Communication and Claims 2020.</p>	
4.6	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <ol style="list-style-type: none"> <li>“The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR).”</li> <li>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.</li> </ol> <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: “This reported figure is not audited through RSPO Certification”.</p>	<p>The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications and selling of its oils are considered RSPO certified.</p>	Complied
<b>Product-specific communications</b>			
<b>5.1 General</b>			

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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.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that the UoC does not make on-pack claims. However, it has been noted that off-pack claim is made by the UoC through shipping documents and invoices, specifically for RSPO-certified Crude Palm Oil (CPO) and Palm Kernel (PK). Additionally, an off-pack claim is also stated in Sime Darby Plantation's (SDP) 2021 Sustainability Report ( <a href="https://sdguthrie.com/wp-content/uploads/2022/04/SDP-SR-2021_20220429.pdf">https://sdguthrie.com/wp-content/uploads/2022/04/SDP-SR-2021_20220429.pdf</a> ).	Complied
5.1.2	Product-specific communications are voluntary.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that the Product-specific communications are made voluntary by the management.	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.	Details of RSPO Trademark License of SD Guthrie Berhad as below: <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label. Consequently, further assessment of this requirement cannot be conducted.	Complied
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that there is no usage of any other trademark or label by the management.	Complied
5.1.5	If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO	As Bukit Benut is an Oil Mill, which only processes FFBS and produces CPO and PK, this particular indicator is deemed not applicable to this UoC.	Not Applicable

	<p>Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> <li>• RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field.</li> <li>• Both parties shall inform their certification body in writing about the agreement.</li> <li>• 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.</li> </ul>		
5.1.6	<p>Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain</p>	<p>As Bukit Benut is an Oil Mill, which only processes FFBs and produces CPO and PK, this particular indicator is deemed not applicable to this UoC.</p>	<p>Not Applicable</p>
<p><b>5.2 Off pack claims</b></p>			
5.2.1	<p>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</p>	<p>Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that the UoC does not make on-pack claims. However, it has been noted that off-pack claim is made by the UoC through shipping documents and invoices, specifically for RSPO-certified Crude Palm Oil (CPO) and Palm Kernel (PK). Additionally, an off-pack claim is also stated in</p>	<p>Complied</p>

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	<p>should be used together with the valid trademark licence number wherever an off pack claim is made.</p>	<p>Sime Darby Plantation's (SDP) 2021 Sustainability Report (<a href="https://sdguthrie.com/wp-content/uploads/2022/04/SDP-SR-2021_20220429.pdf">https://sdguthrie.com/wp-content/uploads/2022/04/SDP-SR-2021_20220429.pdf</a>),</p>	
<p>5.2.2</p>	<p>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.</p>	<p>Based on the documentation review and interviews with relevant personnel, it has been confirmed that when confirming the sale of certified palm oil products, Bukit Benut Oil Mill has adhered to the requirements of the RSPO Supply Chain Certification Standard (SCCS). Samples as below:</p> <p>CPO - IP</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer; BUYERXXXXXX</li> <li>b) The name and address of the seller; Bukit Benut POM</li> <li>c) The loading or shipment / delivery date; 25/04/2024</li> <li>d) The date on which the documents were issued; 25/04/2024</li> <li>e) RSPO Certificate Number: RSPO 591224</li> <li>f) A description of the product: CPO IP</li> <li>g) The quantity of the products delivered; 39.80 Mt</li> <li>h) Any related transport documentation; DEGXXXX</li> <li>i) A unique identification number: 012XXX</li> </ul> <p>PK - IP</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer; BUYERXXXXXX</li> <li>b) The name and address of the seller; Bukit Benut POM</li> <li>c) The loading or shipment / delivery date; 17/04/2024</li> <li>d) The date on which the documents were issued; 17/04/2024</li> </ul>	<p>Complied</p>

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		<p>e) RSPO Certificate Number: RSPO 591224</p> <p>f) A description of the product: PK IP</p> <p>g) The quantity of the products delivered; 29.54 Mt</p> <p>h) Any related transport documentation; KFKXXXX</p> <p>A Unique identification number: 012XXX</p>	
5.2.3	<p>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:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2.</li> </ul>	<p>As Bukit Benut is an Oil Mill, which only processes FFBs and produces CPO and PK, this particular indicator is deemed not applicable to this UoC. There is no distributor or wholesaler involves.</p>	Not Applicable
<b>5.3 On pack claims</b>			
5.3.1	<p>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 purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.</p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been</p>	Complied

		made. Consequently, further assessment of this requirement cannot be conducted.	
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> <li>• RSPO IP/SG CERTIFIED*</li> <li>• Contains RSPO IP/SG palm oil*</li> <li>• Contains RSPO certified palm oil (IP/SG)*</li> </ul> <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> <li>• RSPO MIXED*</li> <li>• Contributes to the production of RSPO certified palm oil*</li> <li>• Contains RSPO certified palm oil (MB)*</li> </ul> <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> <li>• RSPO 50% MIXED*</li> <li>• Contains at least 50% RSPO certified palm oil*</li> </ul> <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul>	Complied

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		<p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	
	<p>D) For Products covered with Book and Claim (B&amp;C):</p> <ul style="list-style-type: none"> <li>• RSPO CREDITS*</li> <li>• Supports the production of RSPO certified palm oil*</li> <li>• Contains palm oil covered by the purchase of RSPO Credits*</li> </ul> <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
5.3.3	<p>On pack claims shall not include information about the claimant’s RSPO membership status.</p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
5.3.4	<p>Members shall not communicate to consumers information about their suppliers’ RSPO membership status.</p>	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul>	Complied

		However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.	
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.	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
<b>MODULE A – IDENTITY PRESERVED</b>			
	95% of the palm oil content must be RSPO IP certified.	The mill does not have any intention to accept and process any non-certified FFB, CPO or PK. Cross refer to Indicator 3.8.12 for further information.	Complied



	<p>If 100% of RSPO IP 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.</p>	<p>The mill does not have any intention to accept and process any non-certified FFB, CPO or PK. Cross refer to Indicator 3.8.12 for further information.</p>	<p>Complied</p>
<p><b>Messaging</b></p>			
	<p>Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements:</p> <ul style="list-style-type: none"> <li>• The palm oil products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> </ul>	<p>SOU 22- Bukit Benut POM is producing crude palm product and does not involve in any labelling of end product.</p>	<p>Complied</p>
<p><b>Product-Specific Communications Labelling</b></p>			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• RSPO Trademark that includes the tag "CERTIFIED"; or</li> <li>• RSPO Trademark that includes the tag "This product contains certified sustainable palm oil".</li> </ul>	<p>SOU 22- Bukit Benut POM is producing crude palm product and does not involve in any labelling of end product.</p>	<p>Complied</p>
<p><b>MODULE B – MASS BALANCE SPECIFIC RULES</b></p>			
<p><b>Mass Balance palm oil content</b></p>			

	95% of the palm oil content must be RSPO MB-certified.	CPO produce for MB certified containing 100% oil palm content	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.	CPO produce for MB certified containing 100% oil palm content	Complied
<b>Messaging</b>			
	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> <li>• [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.</li> <li>• 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.</li> </ul>	Upon conducting a site visit, interviewing relevant personnel, and reviewing documentation, it has been confirmed that there is no storytelling in product-specific communications made by the management.	Complied
<b>Product-Specific Communications Labelling</b>			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil".</li> </ul>	<p>Details of RSPO Trademark License of SD Guthrie Berhad as below:</p> <ul style="list-style-type: none"> <li>• License No.: RSPO-1106024</li> <li>• License Start Date: 23/06/2023</li> <li>• License Expiration: 22/06/2025</li> </ul> <p>However, it has been noted that there is no usage of the RSPO Trademark License and RSPO Label, and also no on-pack has been made. Consequently, further assessment of this requirement cannot be conducted.</p>	Complied
<b>Principle 4: Respect community and human rights and deliver benefits</b>			
<b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			

<p>4.1.1</p>	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established the Group Sustainability &amp; Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding &amp; no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC) last revised 2020. Under section 3.2.1 of HRC stated that the company's commitment on eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking, and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution. Furthermore, the company is committed to provide decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs.</p> <p>Aside the above, Policy on the Protection of Human Rights Defenders (HRDs) was established with effective date on 25/03/2020. SD Guthrie Berhad respect and safeguard human rights, nation of democracy and its institution. They recognize that Human Rights Defenders have the role and responsibility of upholding human rights and the need for them to be able to lodge complaints that may arise from their business activities and relationship with SD Guthrie Berhad. This policy is applied to all stakeholders affected by the business activities and relationships including directors, employees, counterparties, business partners, workers in our operations and supply chains, and communities surrounding our operations.</p> <p>All the above policies were communicated to the employees during induction training for new employees and morning muster. While for external stakeholder, the policies were communicated during</p>	<p>Complied</p>
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		<p>stakeholder meeting on 26/03/2024 which combined all estates and mill under SOU 22 Bukit Benut.</p> <p>Reflecting to the above, feedback received from stakeholders' consultation conducted during the audit with sampled workers and several external stakeholders found, there is no issue raised related to the human right at each visited operating unit. During the interview with some of the workers (both local and migrant), they mentioned that they were aware of such policy and commitments by company even though they are not able to remember it word by word but is reflected in their working environment and the management always remind about it during morning muster and other training or meeting. They also provided with training and reminded during morning muster.</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad prohibits any form of violence or harassment in their operation as per the above-mentioned policies. Based on interview with sampled workers and gender committee representatives, there has been no case reported with regards to violence and harassment. No harsh or insulting words are in used for giving orders to do the operation tasks, have been reported by workers. Most of the workers gave feedback that they are comfortable working at SOU 22 Bukit Benut. Should there be any such case, it can be addressed in accordance with the SD Guthrie Berhad's Standard Operating Procedure of Suara Kami Helpline, dated 15/04/2020.</p>	Complied
<p><b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-</p>	<p>SD Guthrie Berhad has established procedure for complaint and grievance which is open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-</p>	Complied

	<p>blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>Procedure for complaint and grievance has been established and documented in Grievance Response Standard Operating Procedure dated 18/07/2022. The procedure specified that several methods to make any complaint such as whistleblowing, workers helpline, suara kami helpline, informal grievances received at operating unit level through Region HR, careline or gender representative and through email that will be handle by Grievance units. For suara kami platform it was guided with the procedure entitled Standard Operating Procedure of Suara Kami Helpline dated 15/04/2022.</p> <p>The above established mechanism is able to resolve the disputes in a timely manner. As per specified in the procedure, the allocated timeframe to resolve the disputes are based on case classification as outlined in the section 3.1.4 and 3.3 of Standard Operating Procedure of Suara Kami and Grievance Response Standard Operating Procedure, respectively. Typically, disputes for non-urgent issue or cases will resolve within 14 working days upon receipt. Furthermore, SD Guthrie Berhad has also developed system to handled social issues, which include:</p> <ol style="list-style-type: none"> <li>1. Social dialogue tool kit           <p>This session is about management and workers engagement between representative of workers, and employer (operating unit management) to resolve workplace and living condition issues through social dialogue. This dialogue frequency will be done every once a month. The issues that been raised during this dialogue will be recorded under a tracker. This tracker will be captured in the dashboard and available to RGM and RCEO</p> </li> <li>2. Oil Palm Pal (OPP)</li> </ol>	
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		<p>This OPP is a digitalized data management, used to capture all complaint/request for repair of workers houses and monitor progress of repair works till completion.</p> <p>It was observed that for the complaints against the top management of the estate/mill or complaint from internal and external parties, such process shall be covered within the whistleblowing channel i.e., Whistleblowing Charter Framework dated 11/2023 (<a href="https://www.sdguthrie.com/who-we-are/corporate-governance/report-your-concerns/">https://www.sdguthrie.com/who-we-are/corporate-governance/report-your-concerns/</a>). Whistleblowing channel which is established as a channel for managing a reported complaint through a secure and accessible whistleblowing channel, transparent investigation and provide protection.</p> <p>Verification on the Suara Kami report, OPP report and issues raised in Social Dialogue at each visited operating unit, it was found that the complaint and grievance were attended to in a timely manner as per specified in the procedure. Interview conducted with sampled of workers including workers representative from different countries indicated that management of each visited operating unit has acted on reported grievance cases. The workers also know the purpose of Suara Kami, OPP, Social Dialogue and whistleblowing channel and found that the contact number/hotline number were displayed at their house. For OPP they can scan the QR code using each individual worker’s mobile phone.</p>	
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>The procedure as mentioned in the indicator 4.2.1 has been briefed and trained to staff and the workers. The same procedure has been briefed to the newly employed workers during induction course. Evidence of the training and briefing conducted are made available for verification during the audit. Observed that the policy is posted on the notice wall at the workers housing.</p>	Complied

		Furthermore, the level of the understanding for the workers on the policy and procedure relating to protection of whistle-blowers and complainant is sufficient whereby the workers are able to properly demonstrate the procedure as verified during interview with several workers consists of Malaysian, Indonesian, Bangladeshi, Nepalese, and Indian workers. There are no illiterate parties has been identified for each operating units. For stakeholders, it was found that they can demonstrates their understanding on the complaint mechanism in the procedure as verified during stakeholder consultation.	
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 -	SD Guthrie Berhad has developed its own online complaint platform called Oil Palm Pal (OPP) for workers to utilized using their smartphones. The complaints will then be registered in a tracking system called Social Dialogue Tracking System. This enables the management to record the complaints and monitor its action progress. A meeting call Social Dialogue Meeting is also conducted once a month between the management and the workers representatives. When interviewed, the workers found to be very well versed in explaining how to use the OPP. The outcomes from this meeting are also registered in the tracking system. Among the information available in the system is details of complaints, name of complainant, action to be taken and timeframe. Verification of sampled issues and interview with workers confirmed that all the complaints/grievances were acted upon on timely manner.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	Reflecting to finding in indicators above, the management unit did recognize rights for the complainants to access independent legal and technical advice. Based on the interview with the workers, there are aware they may independent legal and technical advice from third party mediator such as embassy, labour department and other government agencies.	Complied

		<p>As mentioned in Grievances Response Standard Operating Procedure dated 18/07/2022, the negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p>	
<p><b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
<p>4.3.1</p>	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.            - Minor compliance -</p>	<p>All operating unit in SOU 22 Bukit Benut has committed to contribute to local development in consultation with the local communities. Verification made during the audit showed that contribution to local communities' development is conducted on a case by case and that this is done following the stakeholder meeting of which the matters of the needs is brought up by the stakeholders. Following to such request, further clarification and details of the request is sought and subject to management approval. For any request that has been approved, the stakeholders are then be informed and that the contribution is executed accordingly.</p> <p>Based on records and stakeholder consultation conducted during the audit, the audit team has verified the contribution to community development made by operating unit under SOU 22 Bukit Benut. For example, as below:</p> <ul style="list-style-type: none"> <li>Preparing a route for 'Merentas Desa' in the field area on 21-22/04/2024 and assistance with Auxiliary Police (AP) for traffic control.</li> </ul>	<p>Complied</p>



		<ul style="list-style-type: none"> <li>• Providing route for neighbouring smallholders to transport their harvested crop.</li> <li>• Give permission to open gated access at the security post for school activity.</li> <li>• Repairing of sports rooms facilities at the SJK(T) Xxxxx Xxxxx.</li> <li>• Providing assistance to carry school equipment to the hall on 24/01/2024.</li> <li>• Providing community hall for the school’s Excellence Awards Day and PIBG annual general meeting on 28/01/2024.</li> <li>• Providing an area for military training requested from Royal Malaysian Army on 13 to 18/05/2024.</li> <li>• Contribution for back-to-school programme on 03/04/2024.</li> <li>• Contribution of iftar meal for Ramadhan on 01/04/2024.</li> </ul>	
<p><b>Criterion 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
<p>4.4.1</p>	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.            - Critical (Major) compliance -</p>	<p>It was found that oil palm activities by the mill and estates under SOU 22 Bukit Benut do not diminish the land use rights of other users. There is no evidence found through open-source platform (e.g.: website, news, report, etc.) that land conflict was arise.            Evidence of legal ownership, history of land tenure and the actual legal use of the land has been verified during the audit as follow:  <b>Lambak Elaeis Estate</b>            The estate holds a total of 20 land titles as per samples sighted as following:            - Land title #83323; Lot # Lot 2686; District: Kluang; Subdistrict: Mukim Kluang; Area: 522.0444 ha</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>- Land title #101013; Lot # Lot 526; District: Kluang; Subdistrict: Mukim Kluang; Area: 397.725 ha</li> <li>- Land title #101298; Lot # Lot 2538; District: Kluang; Subdistrict: Mukim Kluang; Area: 287.5291 ha</li> <li>- Land title #134839; Lot # Lot 2983; District: Kluang; Subdistrict: Mukim Kluang; Area: 505.8563 ha</li> <li>- Land title #41657; Lot # Lot 94497; District: Kluang; Subdistrict: Mukim Kluang; Area: 621.1924 ha</li> <li>- Land title #99139; Lot # Lot 3152; District: Kluang; Subdistrict: Mukim Kluang; Area: 372.1084 ha</li> </ul> <p><b>Bukit Benut Estate</b></p> <p>The estate holds a total of 30 land titles as per samples sighted as following:</p> <ul style="list-style-type: none"> <li>- Land title #98981; Lot # Lot 874; District: Kluang; Subdistrict: Mukim Rengam; Area: 285.4045 ha</li> <li>- Land title #21382; Lot # Lot 875; District: Kluang; Subdistrict: Mukim Rengam; Area: 45.2741 ha</li> <li>- Land title #120736; Lot # Lot 1064; District: Kluang; Subdistrict: Mukim Rengam; Area: 42.0114 ha</li> <li>- Land title #120741; Lot # Lot 1085; District: Kluang; Subdistrict: Mukim Rengam; Area: 180.8942 ha</li> <li>- Land title #120742; Lot # Lot 1087; District: Kluang; Subdistrict: Mukim Rengam; Area: 108.8603 ha</li> <li>- Land title #120735; Lot # Lot 1088; District: Kluang; Subdistrict: Mukim Rengam; Area: 351.8736 ha</li> </ul> <p><b>Bukit Benut POM</b></p> <p>Bukit Benut POM located in the Bukit Benut Estate area. The management has allocated approximately 6.60 hectares out of</p>	
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		612.4907 hectares for the POM. Land title for this POM as follows: Land title #90182; Lot # Lot 1708; District: Kluang; Subdistrict: Mukim Rengam; Area: 612.4907 ha	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	As reflected earlier in indicator 4.4.1, all estates under SOU 22 Bukit Benut have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad).  Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.  - Minor compliance -	As reflected earlier in indicator 4.4.1, all estates under SOU 22 Bukit Benut have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad).  Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.  - Minor compliance -	As reflected earlier in indicator 4.4.1, all estates under SOU 22 Bukit Benut have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad).	Complied

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		Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	As reflected earlier in indicator 4.4.1, all estates under SOU 22 Bukit Benut have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad). Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	Complied
4.4.3	<b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	As reflected earlier in indicator 4.4.1, all estates under SOU 22 Bukit Benut have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad). Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.	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 -	As reflected earlier in indicator 4.4.1, all estates under SOU 22 Bukit Benut have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to	Complied

		<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad).</p> <p>Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.</p>	
4.4.5	<p><b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>As reflected earlier in indicator 4.4.1, all estates under SOU 22 Bukit Benut have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad).</p> <p>Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.</p>	Complied
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>As reflected earlier in indicator 4.4.1, all estates under SOU 22 Bukit Benut have documents indicates the legal ownership and lease land which clearly indicates that the approved usage of the land is for oil palm plantation activities. No land dispute as the land is belongs to SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad).</p> <p>Further verification during interview with sampled of relevant stakeholders which consists of local communities and neighbouring estates confirms that there are no land dispute issues that requires FPIC process since the last audit.</p>	Complied
<p><b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			

<p>4.5.1</p>	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.          - Critical (Major) compliance -</p>	<p>Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in the estates and mill under SOU 22 Bukit Benut. The existing estates are not encumbered by any legal, customary and user rights.</p> <p>This was also confirmed through stakeholders' consultation with sampled stakeholders and boundary verification at visited estate under SOU 22 Bukit Benut, there has been no new planting on local people's land since the last assessment.</p> <p>It was found that oil palm activities by the mill and estates under SOU 22 Bukit Benut do not diminish the land use rights of other users. There is no evidence found through open-source platform (e.g.: website, news, report, etc.) that land conflict was arise.</p> <p><b>Lambak Elaeis Estate</b></p> <p>The estate holds a total of 20 land titles as per samples sighted as following:</p> <ul style="list-style-type: none"> <li>- Land title #83323; Lot # Lot 2686; District: Kluang; Subdistrict: Mukim Kluang; Area: 522.0444 ha</li> <li>- Land title #101013; Lot # Lot 526; District: Kluang; Subdistrict: Mukim Kluang; Area: 397.725 ha</li> <li>- Land title #101298; Lot # Lot 2538; District: Kluang; Subdistrict: Mukim Kluang; Area: 287.5291 ha</li> <li>- Land title #134839; Lot # Lot 2983; District: Kluang; Subdistrict: Mukim Kluang; Area: 505.8563 ha</li> <li>- Land title #41657; Lot # Lot 94497; District: Kluang; Subdistrict: Mukim Kluang; Area: 621.1924 ha</li> <li>- Land title #99139; Lot # Lot 3152; District: Kluang; Subdistrict: Mukim Kluang; Area: 372.1084 ha</li> </ul>	<p>Complied</p>
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		<p><b>Bukit Benut Estate</b></p> <p>The estate holds a total of 30 land titles as per samples sighted as following:</p> <ul style="list-style-type: none"> <li>- Land title #98981; Lot # Lot 874; District: Kluang; Subdistrict: Mukim Rengam; Area: 285.4045 ha</li> <li>- Land title #21382; Lot # Lot 875; District: Kluang; Subdistrict: Mukim Rengam; Area: 45.2741 ha</li> <li>- Land title #120736; Lot # Lot 1064; District: Kluang; Subdistrict: Mukim Rengam; Area: 42.0114 ha</li> <li>- Land title #120741; Lot # Lot 1085; District: Kluang; Subdistrict: Mukim Rengam; Area: 180.8942 ha</li> <li>- Land title #120742; Lot # Lot 1087; District: Kluang; Subdistrict: Mukim Rengam; Area: 108.8603 ha</li> <li>- Land title #120735; Lot # Lot 1088; District: Kluang; Subdistrict: Mukim Rengam; Area: 351.8736 ha</li> </ul> <p><b>Bukit Benut POM</b></p> <p>Bukit Benut POM is located in the Bukit Benut Estate area. The management has allocated approximately 6.60 hectares out of 612.4907 hectares for the POM. Land title for this POM as follows:  Land title #90182; Lot # Lot 1708; District: Kluang; Subdistrict: Mukim Rengam; Area: 612.4907 ha</p>	
4.5.2	<p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities’ own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p>	<p>Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in the estates and mill under SOU 22 Bukit Benut. The existing estates are not encumbered by any legal, customary and user rights.</p> <p>This was also confirmed through stakeholders’ consultation with sampled stakeholders and boundary verification at visited estate</p>	Complied

	- Critical (Major) compliance -	under SOU 22 Bukit Benut, there has been no new planting on local people’s land since the last assessment.	
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 -	Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in the estates and mill under SOU 22 Bukit Benut. The existing estates are not encumbered by any legal, customary and user rights. This was also confirmed through stakeholders’ consultation with sampled stakeholders and boundary verification at visited estate under SOU 22 Bukit Benut, there has been no new planting on local people’s land since the last assessment.	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. - Minor compliance -	Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in the estates and mill under SOU 22 Bukit Benut. The existing estates are not encumbered by any legal, customary and user rights. This was also confirmed through stakeholders’ consultation with sampled stakeholders and boundary verification at visited estate under SOU 22 Bukit Benut, there has been no new planting on local people’s land since the last assessment.	Complied
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 -	Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in the estates and mill under SOU 22 Bukit Benut. The existing estates are not encumbered by any legal, customary and user rights. This was also confirmed through stakeholders’ consultation with sampled stakeholders and boundary verification at visited estate under SOU 22 Bukit Benut, there has been no new planting on local people’s land since the last assessment.	Complied



4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in the estates and mill under SOU 22 Bukit Benut. The existing estates are not encumbered by any legal, customary and user rights.</p> <p>This was also confirmed through stakeholders' consultation with sampled stakeholders and boundary verification at visited estate under SOU 22 Bukit Benut, there has been no new planting on local people's land since the last assessment.</p>	Complied
4.5.7	<p>New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.</p> <p>- Minor compliance -</p>	<p>Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in the estates and mill under SOU 22 Bukit Benut. The existing estates are not encumbered by any legal, customary and user rights.</p> <p>This was also confirmed through stakeholders' consultation with sampled stakeholders and boundary verification at visited estate under SOU 22 Bukit Benut, there has been no new planting on local people's land since the last assessment.</p>	Complied
4.5.8	<p><b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>Based on field visit, documentation review and interview with management, it was verified that there is no new planting and acquisition on the new land is planned and occurred in the estates and mill under SOU 22 Bukit Benut. The existing estates are not encumbered by any legal, customary and user rights.</p> <p>This was also confirmed through stakeholders' consultation with sampled stakeholders and boundary verification at visited estate under SOU 22 Bukit Benut, there has been no new planting on local people's land since the last assessment.</p>	Complied

**Criterion 4.6:** Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

4.6.1	<p><b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p> <p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported in all estates under SOU 22 Bukit Benut. This has also been evident through interview with the local communities.</p>	Complied
4.6.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p> <p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported in all estates under SOU 22 Bukit Benut. This has also been evident through interview with the local communities.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p>	<p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders</p>	Complied

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	- Minor compliance -	reported in all estates under SOU 22 Bukit Benut. This has also been evident through interview with the local communities.	
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 -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported in all estates under SOU 22 Bukit Benut. This has also been evident through interview with the local communities.	Complied
<b>Criterion 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.  There is no acquisition on the new land planned or currently in progress, made by operating units under SOU 22 Bukit Benut for the coming future project. This has been verified through field visit and interview with sampled stakeholders which consists of local communities and neighbouring smallholders.	Complied
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management,	Complied

		<p>Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p> <p>There is no acquisition on the new land planned or currently in progress, made by operating units under SOU 22 Bukit Benut for the coming future project. This has been verified through field visit and interview with sampled stakeholders which consists of local communities and neighbouring smallholders.</p>	
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>There is no customary right land for all operating unit under SOU 22 Bukit Benut. No evidence that community have lost access and rights to land for plantation expansion as the operating units expands the planting area under certified area.</p> <p>Further verification during interview with sampled of the relevant stakeholders which consists of local communities and neighbouring smallholders confirms that there are no land dispute issues.</p>	Complied
<p><b>Criterion 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>There is no customary right land for all operating unit under SOU 22 Bukit Benut. Further verification during interview with sampled of the relevant stakeholders which consists of local communities and neighbouring smallholders confirms that there are no land dispute issues. Boundary stone and trenches were available to demarcate boundary of land.</p>	Complied
4.8.2	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of</p>	<p>There is no customary right land for all operating unit under SOU 22 Bukit Benut. Further verification during interview with sampled of the relevant stakeholders which consists of local communities and neighbouring smallholders confirms that there are no land dispute</p>	Complied

	certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	issues. Boundary stone and trenches were available to demarcate boundary of land.	
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	There is no customary right land for all operating unit under SOU 22 Bukit Benut. Further verification during interview with sampled of the relevant stakeholders which consists of local communities and neighbouring smallholders confirms that there are no land dispute issues. Boundary stone and trenches were available to demarcate boundary of land.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	There is no customary right land for all operating unit under SOU 22 Bukit Benut. Further verification during interview with sampled of the relevant stakeholders which consists of local communities and neighbouring smallholders confirms that there are no land dispute issues. Boundary stone and trenches were available to demarcate boundary of land.	Complied
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and previous Fresh Fruit Bunch (FFB) prices are available as per the MPOB Daily FFB Reference Price Summary by Region. In addition to FFB from its own estates, the mill receives FFB from sister estates and diversions from other certified Strategic Operating Units (SOU). The FFB suppliers are listed in the Bukit Benut Palm Oil Mill (POM) FFB Supplier list. No external or non-certified FFB is received by Bukit Benut POM.	Complied
5.1.2	<b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).	The mill receives FFB from sister estates within SOU 22 and from FFB diversions from other certified SOUs. The FFB suppliers are listed in the Bukit Benut POM FFB Supplier list. No external or non-certified FFB is received by Bukit Benut POM.	Complied

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	- Critical (Major) compliance -		
5.1.3	<b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	The mill receives FFB from sister estates within SOU 22 and from FFB diversions from other certified SOUs. The FFB suppliers are listed in the Bukit Benut POM FFB Supplier list. No external or non-certified FFB is received by Bukit Benut POM.	Complied
5.1.4	<b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	The mill receives FFB from sister estates within SOU 22 and from FFB diversions from other certified SOUs. The FFB suppliers are listed in the Bukit Benut POM FFB Supplier list. No external or non-certified FFB is received by Bukit Benut POM.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Current and previous Fresh Fruit Bunch (FFB) prices are available as per the MPOB Daily FFB Reference Price Summary by Region. In addition to FFB from its own estates, the mill receives FFB from sister estates and diversions from other certified Strategic Operating Units (SOU). The FFB suppliers are listed in the Bukit Benut Palm Oil Mill (POM) FFB Supplier list. No external or non-certified FFB is received by Bukit Benut POM.	Complied
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	The mill receives FFB from sister estates within SOU 22 and from FFB diversions from other certified SOUs. The FFB suppliers are listed in the Bukit Benut POM FFB Supplier list. No external or non-certified FFB is received by Bukit Benut POM.	Complied
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Weighbridge calibration #D127589 inspected by De Metrology dated 06/11/2023. Weighbridge calibration #D186770 inspected by De Metrology dated 23/11/2023.	Complied

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5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	<p>The mill receives FFB from sister estates within SOU 22 and from FFB diversions from other certified SOUs. The FFB suppliers are listed in the Bukit Benut POM FFB Supplier list. No external or non-certified FFB is received by Bukit Benut POM.</p>	Complied
5.1.9	<p><b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>SD GUTHRIE BERHAD has established SOP to handle any grievances documented in Grievance Response Standard Operating Procedure, ver. No. 2 dated 18/07/2022. No independent smallholders within Bukit Benut POM certification unit.</p>	Complied
<b>Criterion 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	<p>The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>No independent smallholders under SOU 22. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 22 or diversion from other certified estate from other SOU under SD GUTHRIE BERHAD. Therefore the indicator is not applicable.</p>	Not Applicable
5.2.2	<p>The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).</p> <p>- Minor compliance -</p>	<p>No independent smallholders under SOU 22. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 22 or diversion from other certified estate from other SOU under SD GUTHRIE BERHAD. Therefore the indicator is not applicable.</p>	Not Applicable
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>No independent smallholders under SOU 22. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 22 or diversion from other certified estate from other SOU under SD GUTHRIE BERHAD. Therefore the indicator is not applicable.</p>	Not Applicable

5.2.4	<p><b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>No independent smallholders under SOU 22. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 22 or diversion from other certified estate from other SOU under SD GUTHRIE BERHAD. Therefore the indicator is not applicable.</p>	Not Applicable
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>No independent smallholders under SOU 22. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 22 or diversion from other certified estate from other SOU under SD GUTHRIE BERHAD. Therefore the indicator is not applicable.</p>	Not Applicable
<p><b>Principle 6: Respect workers' rights and conditions</b></p>			
<p><b>Criterion 6.1:</b> Any form of discrimination is prohibited.</p>			
6.1.1	<p><b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They promote diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity union membership, political affiliation, or age.</p> <p>The above documents could be downloaded from <a href="https://www.sdguthrie.com/wp-content/uploads/2021/12/HRC-2020-1.pdf">https://www.sdguthrie.com/wp-content/uploads/2021/12/HRC-2020-1.pdf</a>.</p> <p>It was found that the above policies are communicated to all level of workforce via series of training or briefing, besides simplified pictorial flowchart and instruction are displayed at appropriate places, at sampled visited operating unit under SOU 22 Bukit Benut.</p>	Complied



		The interviewees, including managerial level, workers, contractors and their workers, local community have given feedback they understood that the gist of the policies. Based on records of employment and interviews conducted on-site with sampled internal and external stakeholders, it has been confirmed that workers and groups, including local communities, women, and migrant workers, have not been subjected to discrimination.	
6.1.2	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	Based on interview with the sampled workers from different gender and nationalities at each visited operating unit under SOU 22 Bukit Benut, it was confirmed that there was no discrimination reported and the management of each operating unit has been fair to them. The management has treated all employees equally for example in term of providing accommodation, medical treatment, job opportunity, wages rate, etc. There was also no charging of recruitment fees incurred for foreign workers. Based on the interview, the promotions were based on their capabilities and discipline at work, for example, there is a female mandore looking after the harvesters which mostly men, and migrant workers appointed as mandore.	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has developed a Promotion for Employees (Doc. No.: SDP/HRUM/2020/SOP01 dated 01/01/2020) and Career Progression for Workers Level (both local and foreign workers), (Doc. No.: SDP/HRUM/2020/SOP01, dated 01/01/2020) to provide a guideline on promotion process to ensure all employees are given fair and equal opportunity based on the set requirements such as work performance and suitability of the position. In sight of the flowchart on career progression for workers level, for example:</p> <ol style="list-style-type: none"> <li>1. General worker/harvester to mandore level</li> <li>2. Mandore to Supervisor Level</li> </ol>	Complied

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		<p>The above procedure also explained the following:</p> <ol style="list-style-type: none"> <li>1. Criteria and conditions for promotion whereby the job promotion for local and foreign workers will be offered when there are availability of vacancies or new position or additional scope of responsibilities to be undertaken by an individual.</li> <li>2. Generally to qualify for the promotion the individual should:             <ol style="list-style-type: none"> <li>a. served at least 1 year in the same position with the company. Otherwise, a justification from management is required to support the promotion recommendation.</li> <li>b. consistently performed and met his/her work target set.</li> <li>c. no records of misconduct or disciplinary actions taken against him/her for at least last 2 consecutive financial years.</li> <li>d. for promotion to supervisory position, the candidate shall possess a minimum of SPM qualifications or equivalent.</li> </ol> </li> </ol> <p>Through interviews with sampled workers who were promoted to their current positions confirmed that the promotion was based on their performance and skill. Some of the interviewed workers started as general workers who were promoted to Mandores.</p> <p>During the interview with the female workers, they mentioned that there is room for them to move around but within the job scope that suitable with their performance and skill. For example, at Bukit Benut Estate, a female worker used to work as the general workers for upkeep activities at the field and now she is looking after the baby and toddlers at the NEST centre.</p>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Based on interview with medical assistant and sampled female workers at the mill and the estates confirmed that the management has never impose any pregnancy test during their tenure in the operating unit. No requirement for pregnancy test to be conducted in each operating unit under SOU 22 Bukit Benut. The test is only</p>	Complied

		<p>carried out by themselves if they suspected to be pregnant. The female workers are aware that they need to inform their superior once they are confirmed pregnant to ensure that they will be assessed to whether they are fit to carry out their current tasks. According to the female workers, they are responsible for their own family planning.</p> <p>Most of the female workers at Bukit Benut POM are not involved in mill operating works, mostly as administration workers in the office, cleaners, and one laboratory helper. For Bukit Benut Estate and Lambak Elaeis Estate, some of female workers are given tasks such as sprayer or manuring and lighter work such as linesweeper at the line site, upkeep activities, and mandore. Once they inform the management that they are pregnant, they will be provided with alternative equivalent employment until the baby reached two years old. If there are any cases of delaying on menstrual, medical assistant will advise the female workers to conducted test in estate clinics or to nearest government health clinic.</p>	
6.1.5	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Each operating unit under SOU 22 Bukit Benut has its own gender committee which objectives are to discuss on issues pertaining to female workers' welfare, female workers need such as new mother needs assessment, issues pertaining to sexual harassment and the annual activities for the members. On the other hand, to create opportunities for the development of female leadership and promote women active participation in the workforce and at the same time to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. The committees had their regular meetings once in every three months in accordance with procedure. Minutes of meeting were made available for verification. So far, there has been no issue raised by the female workers as verified from the feedback forms and minutes of meeting with regards to discrimination, unfair treatment, and</p>	Complied

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		<p>opportunity disparity. Based on interview with the Gender Committee representatives at each visited operating units, it was confirmed that there has been no case of sexual harassment or violence reported.</p>											
<p>6.1.6</p>	<p>There is evidence of equal pay for the same work scope.          - Minor compliance -</p>	<p>The wage structure in the SOU 22 Bukit Benut follows the Malayan Agricultural Procedures Association (MAPA) rates which also follow the Minimum Wages Order 2022. Each of the job has their own work scope which also included in the contract agreement of the workers. The salary structure is comprised of the total daily rates (based on performance), overtime, and other benefits.</p> <p>For the harvester, the wage structure is based on the MAPA/NUPW rates of pay for harvesting and other criteria which include the height of the oil palm trees. The workers were paid accordingly.</p> <p>Based on the sampled payslips for workers (as per indicator 6.2.3), which consists of both genders, it was noted that workers were paid equally for the same job scope. They were paid according to the Minimum Wage Order 2022 and MAPA/NUPW collective agreements without any form of discrimination. This was also evident through interview with a group of workers sampled. Sample of workers for each visited operating units listed as per below worker's ID:</p> <p><b>Bukit Benut POM</b></p> <table border="1" data-bbox="1137 1114 1926 1326"> <tr> <td>150XXX</td> <td>174XXX</td> </tr> <tr> <td>175XXX</td> <td>107XXX</td> </tr> <tr> <td>127XXX</td> <td>161XXX</td> </tr> <tr> <td>163XX</td> <td>169XXX</td> </tr> <tr> <td>797XX</td> <td>158XXX</td> </tr> </table> <p><b>Bukit Benut Estate</b></p>	150XXX	174XXX	175XXX	107XXX	127XXX	161XXX	163XX	169XXX	797XX	158XXX	<p>Complied</p>
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<p><b>Criterion 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>																																			
6.2.1	<p><b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has signed the Collective Agreement (For field/ oil palm harvesters/oil mill and other general employees) with NUPW [MAPA circular No. 12/2019, dated 02/04/2019] and the collective agreement is valid for three (3) years or until superseded by new Collective Agreement or an Award of the Industrial Court. Employment contract was established based on the collective agreement and available in all languages of which the workers are</p>	Complied																																

		from. Samples of employment contracts were reviewed and found that the agreements were signed by the employees. Any new foreign workers will be inducted for the terms and conditions of employment contract and briefed on the company's policies, upon arrival to the operating units. The implementation of this practice was evident through interview with the sampled workers.	
6.2.2	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	Based on sampled employment contracts the contracts were signed in dual language which is English and their home country language such as Bahasa Indonesia, Hindi, and Bangladeshi. The terms and conditions such as working hours, deduction, overtime, sick leave, holiday entitlement, reason of dismissal and period of notice were outlined in the contract. The extension contract has outlined the terms and condition according to the Collective agreement, Employment Act and Minimum Wage Order 2022.	Complied
6.2.3	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) between National Union of Plantation Workers (NUPW) has established 'MAPA/NUPW Palm Oil Mill Employees' Agreement' that describes the term and condition of workers employment. Sighted the agreement is available in English and valid for three (3) years or until superseded by new Collective Agreement or an Award of the Industrial Court.</p> <p>Each visited operating unit under SOU 22 Bukit Benut has established a contact agreement and offer letter for foreign and local workers, respectively. The contract agreement is available in Bahasa Malaysia, Indonesia, Bengali, Hindi and Tamil depends on which country they are from. The contract agreement found signed by both parties (management and workers). Document review found, the employment contract has included a terms and condition of employment as example below:</p>	Complied

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- Wages
- Working Hours
- Sick Leave
- Annual Leave
- Maternity Leave (stated in Offer Letter for Local Workers)
- Termination Service

According to the interviewed workers, their working days are from Monday to Saturday, with Sunday is the rest day. Each visited operating unit provides a 3-month maternity leaves to the female workers regardless of the worker's race, religious and political attraction. While annual and medical leaves are offered based on the worker's service period. The unused annual leaves are paid during the December salary. The calculation of the paid annual leaves is based on their monthly salary which fluctuate depending on their performance and the rate is calculated as Ordinary Rate Pay as specified in the Employment Act.

Samples payslip for workers from various operations such as mill operators, harvester, field workers and general workers were verified. Overtime was found to be appropriate, and deduction was fairly made as per the agreement and approval from the Labour Department. Sample of workers for each operating units listed as per below worker's ID:

**Bukit Benut POM**

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6.2.4	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p>	<p>The management provides adequate living quarters with basic amenities to ensure the workers are comfortable doing their daily routine. Sighted during site visits; habitable quarters, sanitation facilities, water, and electricity supply, medical, educational and welfare amenities were provided as per industry best practices. Observed during site visit, the management has provided housing facilities such as ceiling fan, bed, and meat safe.</p>	Complied																																				



	<p>- Critical (Major) compliance -</p>	<p>Workers are accommodated at the housing complex quarters of the operating units without any charges. Free water supply, subsidised electric supply and free medical support were also given to all workers. Housing inspection was conducted weekly by the Medical Assistant using the Housing Complex/ Nest/ Community Hall Weekly Inspection Checklists (PIOA). Sighted the form were categorized into:</p> <ul style="list-style-type: none"> <li>● Cleanliness/ domestic waste/ landscaping</li> <li>● Drainage system</li> <li>● Nursery/ crèche</li> <li>● Community hall, sports and other recreational facilities</li> </ul> <p>Platform namely, 'OPP (Oil Palm Pal) System' with QR code is developed for workers lodge a report pertaining to the housing defects. Sighted in the OPP system, the workers need to provide Name, House Number and Damage Complaint before submitting the complaint. Later, the complaint report will be summarized into 'Housing Defect Consent Form' (HDCF) that contain the following information:</p> <ul style="list-style-type: none"> <li>● Status (completed/ void/ incomplete)</li> <li>● Risk category</li> <li>● Estimated completion date</li> <li>● Date start in progress</li> <li>● Date completed</li> <li>● Date voided</li> <li>● Remarks</li> </ul>	
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		<p>Review the sample of OPP form at visiting estate and mill found, there is no issue left unattended by the management where all complaints received were resolved within 14 days.</p> <p>Informed by the local workers who living inside the estate or mill that, each visited operating unit do provides a transportation for their children to go to the school for secondary school. For primary school, the school is located within the estate area. The following were informed by the sample of workers during site interview:</p> <ul style="list-style-type: none"> <li>• Worker’s housing was provided with basic necessities such as water and electricity supply.</li> <li>• Training to use the QR code (‘OPP (Oil Palm Pal) System’) is provided by the management. During the audit, the workers are able to demonstrate their knowledge on using the QR code.</li> <li>• The management will take immediate action for any issue lodged and for pending issue, the management will communicate during morning master.</li> <li>• Clinic is available in the estate. As for the critical issue, they will be sent to the nearby hospital by using company’s vehicle.</li> </ul> <p>Other social facilities are available such as community hall, clinic and football field.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There was no issue on accessibility to adequate and sufficient food supplies as sundry shops were available in housing complex. Site visit to the sundry shop found, basic food and cooking utensils are available at reasonable prices. he owner of the shop has able to present valid permit form the government agencies to sell controlled item such as cooking oil, rice, and flour. Workers are also free to go to the nearby towns for more options of groceries. There has been no complaint received with regards to the price of supplies. Based</p>	Complied

		<p>on interview with sampled workers, the basic supplies were affordable.</p> <p>In addition, 10 kg of rice are provided at no cost to all of the workers for every two months. Sampled workers' have given positive feedback on this initiative where they can save the money allocated to buy a rice.</p>	
<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p>	<p>The certification unit has provided decent living wage for both local and foreign workers based on company's prevailing wages assessment. Among the items included in the calculation were wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, transport allowance, telecommunication, and welfare. Document review of sampled worker's payslips, sighted with evidence that daily rated workers receive at least minimum wages is RM57.69 per day. For piece-rated workers paid according to capability of the workers to achieve daily target. The piece-rated workers received their wages from RM1,500.00 and above per each month. For both, daily rated workers and piece rated workers are complied with the Minimum Wage Order 2022. The management conducted Prevailing Wage Assessment based on check-roll worker for period 2023 and published in January 2024.</p>	<p>Complied</p>

	<p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage). The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment</li> <li>• The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul> <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment 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</p> <p>- Minor compliance -</p>	<p>All core activities such as milling activities, harvesting, chemical spraying and fertilizer application were performed by the permanent employee.</p> <p>Sighted during site visit, each operating unit is using SAP (System Application and Product in Data Processing) system to maintain and update the administration and operation information. By using the SAP, each operating unit has established 'Employee Master List' which includes an information such as:</p> <ul style="list-style-type: none"> <li>• Employee number</li> <li>• Full name</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>• Date of Birth</li> <li>• Nationality</li> <li>• Date of Join</li> <li>• Employment Status</li> <li>• Race</li> </ul> <p>Each visited operating unit has appointed a contractor for POME transport, FFB transport and replanting. Through documentation review, estates and mill has established a contract agreement between the contractors and describe the term and condition of the job awarded. Verification on the contract agreement found, the contract agreement is signed by both parties. There are no casual or temporary workers has been recruited by all operating units as verified in the master list of workers.</p>	
<p><b>Criterion 6.3:</b> The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Policy to respect the rights of all employees has been embedded in SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established policy of "Group Sustainability &amp; Quality Policy Statement" which was signed by the Group Managing Director (Mr. Mohamad Helmy Othman Basha), dated 2/12/2019. The policy is guided by Human Right Charter (HRC) revised 2020. Section 3.2.4 of HRC stated that the company respecting freedom of association by respecting the rights of employees to form and join unions and bargain collectively. In jurisdictions where this right is limited, we will provide alternative means of employee engagement and grievance redressal.</p>	Complied

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		<p>Employees were given freedom to associate and bargain collectively with company and to organize among themselves through association meetings as per sample latest minutes of meeting between Management and NUPW representatives. The policy has been communicated to the workers through musters call as verified during the interview session with sampled workers during the audit.</p>									
<p>6.3.2</p>	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Based on documentation review, each visited operating unit has conducted a meeting between NUPW representatives and management as follows:</p> <table border="1" data-bbox="1137 687 1926 917"> <thead> <tr> <th>Estate/Mill</th> <th>Latest Union Meeting</th> </tr> </thead> <tbody> <tr> <td>Bukit Benut Estate</td> <td>10/05/2024</td> </tr> <tr> <td>Bukit Benut POM</td> <td>26/01/2024</td> </tr> <tr> <td>Lambak Elaeis Estate</td> <td>06/07/2024</td> </tr> </tbody> </table> <p>Management plan was developed for the issues raised by the NUPW representatives and action has been taken accordingly. Interviewed with the NUPW representatives confirmed that the issues raised during the meeting were resolved. Sampled workers interview also informed that union representatives are freely elected where there is no interference from management, and they are also involved in voting to appoint representatives.</p>	Estate/Mill	Latest Union Meeting	Bukit Benut Estate	10/05/2024	Bukit Benut POM	26/01/2024	Lambak Elaeis Estate	06/07/2024	<p>Complied</p>
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Lambak Elaeis Estate	06/07/2024										
<p>6.3.3</p>	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>The management through National Union of Plantation Workers (NUPW) (Peninsular Malaysia) has appointed workers representatives from various group of workers regardless of their nationality, religion, race, political view, or gender.</p> <p>The worker's representatives were selected through the election by the workers. The workers will nominate their representatives before</p>	<p>Complied</p>								

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		<p>the election take place. After the election and the workers have selected their representatives, NUPW will issue an appointment letter to the selected representative and a copy of the appointment letter will be submitted to the management for information purposes.</p> <p>It was further confirmed during interview with the NUPW representatives and the workers that the election of the representatives were freely done by the workers without any influence or interference from the management.</p>	
<b>Criterion 6.4:</b> Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Policy to protect children and young person has been embedded in SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) established policy of "Group Sustainability &amp; Quality Policy Statement" which was signed by the Group Managing Director (Mr. Mohamad Helmy Othman Basha), dated 02/12/2019. The policy is guided by Human Right Charter (HRC) revised 2020. Section 3.3.1 of HRC stated the company committed to eradicating child labour in our supply chain and will not employ anyone under the age of 18 years.</p> <p>All the contractors were required to read through Vendor COBC before they signed on the Vendor Integrity Pledge where they will be required to comply with labour and human rights. The contractors had also been briefed on the human right charter and prohibition of child labour. This has confirmed with the stakeholders through stakeholder consultation.</p>	Complied
6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p>	<p>As stated under Section 3.3: Respect and Uphold Children's Right of HRC 2020, SD Guthrie Berhad will not employ anyone under the age of 18 years. This was also explained in the Responsible Recruitment Procedure 2021 where the minimum requirement of the</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>age is 18 years old. Age screening is based on identification documents and/ or passport and from the stated date of birth. The local employees were required to submit a photocopy of identification card during application of job to the management for verification purpose.</p> <p>A computerized check-roll system called 'SEMUA Checkroll System' (also known as SAP system) is in used at estates and mill under SOU 22 Bukit Benut. It was confirmed via demonstration that the system doesn't allow registration for those below 18 years old, therefore the salary scheme cannot be generated. Checking on SAP system at each visited operating unit have not found any of the workers below 18 years old. From the list of employees which has the date of birth and date of join the estate, it can be confirmed that there are no children working in each operating unit. Further confirmation was made through site visit at the workplace area and interviews with the workers onsite.</p>	
<p>6.4.3</p>	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.          - Critical (Major) compliance -</p>	<p>From the list of employees which has the date of birth and date of join the estate, it can be confirmed that there are no children nor young workers working in each operating unit, including the contractors' workers. Further confirmation was made through site visit at the workplace area and interviews with the workers onsite. Identity documentation such as passports and identity cards were verified.</p>	<p>Complied</p>
<p>6.4.4</p>	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.          - Minor compliance -</p>	<p>The management of each operating unit has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders. This had also been confirmed through interview with the stakeholders and contractors.</p>	<p>Complied</p>
<p><b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			



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<p>6.5.1</p>	<p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has developed Human Rights Charter (HRC) last revised 2020 where stated the policy and commitment of the company to prevent all forms of sexual harassment and violence at the workplace. Under section 3.2.1 of HRC stated that the company's commitment on eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking, and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution. Furthermore, under section 3.2.6 mentioned the company is committed to creating a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict. The policy has been communicated to the workers through musters and display on notice boards.</p> <p>Based on the interview with the workers (male and female), no issues on sexual harassment have been lodged or happened. They were also aware of the channels that they can use to lodge their concern. This has also been reminded during morning muster once in a while. Furthermore, the female workers are aware of the procedure if such incident occurs whereby, they can reports using the Grievance channel such as Suara kami and whistleblowing, or direct report to the management.</p>	<p>Complied</p>
<p>6.5.2</p>	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>Stated in the human right charter year 2020, commitment of SD Guthrie Berhad in protecting reproductive right and has been clearly outline in clause 3.2.5. There is evidence that the policy has been implemented where there is no restriction by the management for pregnancy and there are no pregnant/breastfeeding women handling with chemical. It has been further confirmed through interview with the female workers.</p>	<p>Complied</p>

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		Communication of the policy sighted based on briefing records for each operating units and further verified based on interview with the sampled stakeholders and workers which can demonstrate their understanding on the policy that has been established.	
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 -	Assessment for new mothers using dedicated checklist were conducted by each operating unit. The management has appointed a female employee (either the chair of the Gender Committee or the female Medical Assistant (MA)) to conduct the assessment. The assessment was done through direct interview with the female workers. Based on verification of the assessment report and interviews, most new mother sent their children to their mother or outside day care services and were not breastfeeding. However, the management had granted them time during working hours for breastfeeding and regular visits to clinics if needed.	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 -	It has been clearly stated in the Policy on the protection of human rights defenders (HRDs) year 2020 clause 3.3; protection against threats and retaliations that HRD and individual shall be protected from violence, threats and all form of retaliation and clause 3.1; the identity of individuals and information shared in by HRDs, shall be kept confidential to the fullest possible extent in a manner consistent with the need to conduct an investigation, unless the individual consents to disclosure or if disclosure is otherwise required by law.  Each operating unit has established gender committee with objective to improve awareness, identify opportunity and improvement and issue of the workers specifically on women. The committee will act as the mechanism to monitor and investigate if there is any sexual harassment, domestic violence, and abusive children in the operating unit. The frequency of the meeting is once in three months.	Complied

		<p>Apart from that, flowchart and Procedure on Handling Social Issues, version 1, dated 01/11/2008 was implemented as well. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders.</p> <p>In addition, the company has implemented "Suara Kami Helpline" as a platform for the workers to raise any issue. The workers have been informed about the platform through morning muster and display on notice boards. The procedure is also accessible on the company's website.</p> <p>Interview with sample workers confirmed that the workers can demonstrate their understanding on the procedure which anonymity and protects complainants.</p>	
<p><b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees.</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Human Rights Charter 2020 included the commitment to respect and uphold labour rights, under which included the commitment as required in this indicator.</p> <p>Based on interview with the sampled workers, observation, documentation review and site visit to the labour quarters and estate facilities, the following were verified:</p> <p>a. Retention of identity documents or passports: All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. Sampled workers were interviewed and confirmed that they keep their passports themselves. This was further verified during the site visit to the labour quarters, where passport was observed to be kept in the workers houses. Furthermore, the management provides</p>	<p>Complied</p>

		<p>lockers for workers to keep their passport safely. The locker keys are kept by the workers with no duplicate keys held by the management.</p> <ul style="list-style-type: none"> <li>b. Charging of recruitment fee: As specified in the Migrant Worker Responsible Recruitment Procedure 2024, all recruitment fees are borne by the company. Interviews conducted with sampled workers also confirmed that they have not been charged any recruitment fees. They inform that the workers can report any recruitment fees incurred by them to the management prior to departure in source countries, after arrival, during induction process and through grievance procedures.</li> <li>c. Contract substitution: Based on document review, worker interview and site tour, it was noted all the migrant workers are legally recruited. Written employment contract was provided to them in a language that was understood by the workers. Explanation of terms and condition in the contracts was conducted in their origin country. Interview with the sampled workers confirmed that they have entered employment by voluntarily and freely basis. They also informed that all contract signed in their origin country is consistent with the terms and condition that they received upon arrival.</li> <li>d. Involuntary overtime: Based on interviews conducted with the sampled workers, all overtime work was carried out on a voluntary basis. Workers are free to decline any offers for overtime work.</li> <li>e. Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. This was confirmed during interviews with workers. There is no term and condition for any resignation and the flight tickets will bear by the company. Verification of the repatriation records and interview with the sampled workers, shows that the workers are given</li> </ul>	
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		<p>freedom to going back for long leaves or going back for goods. Some workers, who have been employed in the estate and mill for 5 to 12 years, have taken long leaves 2 or 3 times during their services.</p> <p>f. Debt bondage: There is no evidence of any incidence of debt bondage. It has been verified based on sample of pay slips where there is no deduction of salary for debt. Further verification has been done through interview where there is no loan/borrowing money has been given by the management to the workers. The is also no recruitment fee has been charged to the workers hence confirmed that there is debt bondage implement.</p> <p>g. Withholding of wages: There is no evidence of withholding of wages. Workers' wages have been paid by account and can be withdraw at the nearest bank and sighted evidence of payment that has been signed by the workers. There is evidence that there no workers' wages have been withheld. It has been further confirmed through interview with sampled workers.</p>	
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.          - Critical (Major) compliance -</p>	<p>Human Rights Charter 2020 included the commitment to respect and uphold labour rights, under which included the commitment as required in this indicator.</p> <p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has established Migrant Worker Responsible Recruitment Procedure, dated 01/2024. This procedure serves as operational guidance on company commitments in the Human Rights Charter, 2020. The procedure among others included the appointment and monitoring of the agent's performance, and the benefits and rights of the workers at their home country and upon arrival in Malaysia.</p> <p>There are migrant workers has been recruited from India, Indonesia, and Bangladesh to work in SOU 22 Bukit Benut.</p>	Complied

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		<p>Verification during the audit found that there is evidence that the policy and procedures has been implemented where each process of recruitment has been done such as signing employment contract, interview, and consultation with migrant workers at origin countries and One Stop Centre. Based on interview with sampled workers, it has been confirmed that all facilities and benefits has been provided equally for all foreign workers. Passport has been kept by the workers itself. There is no evidence of contract substitution where all migrant workers have been explained the content of the employment contract at the origin countries. It has been confirmed through interview with the workers itself.</p>	
<p><b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
<p>6.7.1</p>	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded. - Critical (Major) compliance -</p>	<p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate/Mill Manager. The mill and estates manager has been appointed as person responsible for safety and health cum chairman for safety and health as per Appointment letter dated 04/01/2023 (to Mr Syahrul Saramlah, Lambak Elaies Estate) dated 04/01/2024, to Mr Fakrul Hilmi bin Muhammad Shah for Bukit Benut Estate and for Bukit Benut POM, appointed Mr Mohd Budwani bin Abidin dated 01/01/2023 by Regional General Manager Southern Region. All correspondence was sighted and verified. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report, workplace inspection, and training. Concerns on issue related health, safety and welfare were discussed at these meetings and recorded. The OSH Committee meeting for</p>	<p>Complied</p>

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		<p>Estate was conducted on quarterly basis. Reviewed the latest minutes meeting FY 2024 as follow</p> <table border="1" data-bbox="1137 475 1937 790"> <thead> <tr> <th>OSH Meeting</th> <th>Bukit Benut POM</th> <th>Bukit Benut Estate</th> <th>Lambak Elaies Estate</th> </tr> </thead> <tbody> <tr> <td>1<sup>st</sup> quarter 2024</td> <td>28/03/2024</td> <td>03/02/2024</td> <td>05/03/2024</td> </tr> <tr> <td>2<sup>nd</sup> quarter 2024</td> <td>21/06/2024</td> <td>03/05/2024</td> <td>23/05/2024</td> </tr> <tr> <td>3<sup>rd</sup> quarter 2023</td> <td>10/10/2023</td> <td>24/08/2023</td> <td>06/12/2023</td> </tr> <tr> <td>4<sup>th</sup> quarter 2023</td> <td>13/07/2023</td> <td>07/11/2023</td> <td>15/09/2023</td> </tr> </tbody> </table> <p>Workplace inspections are made prior to the ESH meeting. Latest workplace inspection was conducted on the month of February and April 2024</p>	OSH Meeting	Bukit Benut POM	Bukit Benut Estate	Lambak Elaies Estate	1 <sup>st</sup> quarter 2024	28/03/2024	03/02/2024	05/03/2024	2 <sup>nd</sup> quarter 2024	21/06/2024	03/05/2024	23/05/2024	3 <sup>rd</sup> quarter 2023	10/10/2023	24/08/2023	06/12/2023	4 <sup>th</sup> quarter 2023	13/07/2023	07/11/2023	15/09/2023	
OSH Meeting	Bukit Benut POM	Bukit Benut Estate	Lambak Elaies Estate																				
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4 <sup>th</sup> quarter 2023	13/07/2023	07/11/2023	15/09/2023																				
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Refer Emergency Preparedness &amp; Response Procedures dated 17/11/2021 with reference number UM/HSE/SP/02. Procedures were available in the estates and mills to address potential emergencies such as Flood, Fire, Chemical Spillage, Poisoning, Earthquake/landslide, Accidents, Storm, and Wild/ Poisonous Animal Attacks.</p> <p>The plans have been displayed on notice boards in the mills and estates and communicated to the workers. Emergency contact numbers have also been posted on these notice boards and provided to the workers. Interviews with workers, including mandores and store attendants, indicated that they are aware of the available emergency response plans. Trainings were conducted</p>	Complied																				

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		<p>at the mill and estates to raise awareness among the workers about emergency responses. The details of these trainings are listed below.</p> <table border="1" data-bbox="1137 467 1924 667"> <thead> <tr> <th>Estate/ Mill</th> <th>ERP Training date</th> </tr> </thead> <tbody> <tr> <td>Bukit Benut POM</td> <td>23/09/2023</td> </tr> <tr> <td>Bukit Benut Estate</td> <td>24/04/2024</td> </tr> <tr> <td>Lambak Elaeis Estate</td> <td>13/06/2024</td> </tr> </tbody> </table> <p>First aiders were stationed in the operating units, having received training and certification as Persons in Charge (PIC) to handle first aid. Observations during visits to the mill and estates revealed that each station and work gang was equipped with first aid kits. Interviews with the designated first aid holders confirmed their proficiency in using the contents of the first aid boxes. These boxes are regularly checked by the mill and estate Hospital Assistants to restock used items and replace expired ones.</p> <p>Training for 1<sup>st</sup> aider as per below</p> <table border="1" data-bbox="1137 1023 1924 1222"> <thead> <tr> <th>Estate/ Mill</th> <th>1<sup>st</sup> aid training date</th> </tr> </thead> <tbody> <tr> <td>Bukit Benut POM</td> <td>20/05/2024</td> </tr> <tr> <td>Bukit Benut Estate</td> <td>05/07/2024</td> </tr> <tr> <td>Lambak Elaeis Estate</td> <td>24/03/2024</td> </tr> </tbody> </table>	Estate/ Mill	ERP Training date	Bukit Benut POM	23/09/2023	Bukit Benut Estate	24/04/2024	Lambak Elaeis Estate	13/06/2024	Estate/ Mill	1 <sup>st</sup> aid training date	Bukit Benut POM	20/05/2024	Bukit Benut Estate	05/07/2024	Lambak Elaeis Estate	24/03/2024	
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Lambak Elaeis Estate	13/06/2024																		
Estate/ Mill	1 <sup>st</sup> aid training date																		
Bukit Benut POM	20/05/2024																		
Bukit Benut Estate	05/07/2024																		
Lambak Elaeis Estate	24/03/2024																		
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for</p>	<p>The mill and estates visited provided all workers with appropriate personal protective equipment (PPE) according to their job types. The PPE was distributed in accordance with HIRARC and the Personal Protective Equipment (PPE) Procedure, UM/HSE/OCP/03 dated 09/03/2021. Management supplied the PPE free of charge.</p>	Complied																



	those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. - Critical (Major) compliance -	During field visits to the Spraying Gang and Manuring Gang, and inspections of the stores at the respective estates and mill, workers were observed wearing the PPE. The estates also maintained facilities for workers to sanitize themselves before returning home, with showers in good working condition.	
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 -	All workers receive medical care covered by the management of the operating units. Each unit has its own dispensary, managed by a certified Hospital Assistant, with no restrictions on workers obtaining medical aid from these facilities. For major injuries or health issues, workers are referred to private clinics or hospitals, with all expenses fully covered by management. Additionally, all workers are insured in accordance with Malaysian law through SOCSO contributions, as evidenced by the PERKESO Monthly Salary Contribution (Form 8A).	Complied
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems. Occupational Injuries were recorded as below:	Complied

Operating Unit	2023		Hours worked
	Cases	TLA	
Bukit Benut POM	3	5	281,017.44
Bukit Benut Estate	15	220	462,624
Lambak Estate	14	51	564,998.00

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

**Criterion 7.1:** Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

<p>7.1.1</p>	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -</p>	<p>IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators.</p> <p>There are several IPM available as per IPM plan in Lambak estate as per below:-</p> <p>Rat – To install the barn owl box base on requirement 1box:10ha. As per to date the barn owl box was in progress to achieve the target as per budget for FY 2024 verified. The below was status of barn owl box status.</p> <table border="1" data-bbox="1205 815 1861 1062"> <thead> <tr> <th>Estate</th> <th>Available box</th> <th>Target</th> <th>Box occupancy</th> </tr> </thead> <tbody> <tr> <td>Lambak Elaeis</td> <td>394</td> <td>334</td> <td>14</td> </tr> <tr> <td>Bukit Benut Estate</td> <td>293</td> <td>253</td> <td>10</td> </tr> </tbody> </table> <p>Beneficial plants such as Turnera subulata and Cassia cobanensis are grown in the estate and their records of planting in new areas and maintenance of existing areas of beneficial plants and location maps are available. Leaf-eating pest census was regularly carried out to obtain information about threshold level and action to be taken thereafter. Census records were available for verification which has shown the effectiveness of the planting of beneficial plants to reduce the leaf eating caterpillars.</p>	Estate	Available box	Target	Box occupancy	Lambak Elaeis	394	334	14	Bukit Benut Estate	293	253	10	<p>Complied</p>
Estate	Available box	Target	Box occupancy												
Lambak Elaeis	394	334	14												
Bukit Benut Estate	293	253	10												

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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 -	None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM. This is not practiced in the estates visited.	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 -	Interview with the estate management and workers indicated that there was no use of fire as pest control in the estates. Visit around the estate also indicated that there was no evidence of fire being used as the methods of pest control is mainly via pesticide applications and biological controls (IPM).	Complied			
<b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.						
7.2.1	<b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	The written justification in Standard Operating Procedure (SOP) of all agrochemicals are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by SD Guthrie (formerly known as Sime Darby Plantation Berhad). Refer to SD Guthrie Agricultural Reference Manual formerly known as Sime Darby Plantation Agricultural Reference Manual, Issue No:2 dated June 2021. The manual already classified the type of weed, herbicide to used, rate/dosage and dilution rate as a guidance based on the field conditions. Addition or reduction of rounds and dosage will be considered in consultation with the respective head of units or agronomist.	Complied			
7.2.2	<b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. - 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 estate. Sighted the sampled records of pesticides usage (A.I.) per ha at estates visited FY 2023 (to date) as follows: Bukit Benut Estate <table border="1" data-bbox="1137 1337 1930 1378"> <tr> <td data-bbox="1137 1337 1402 1378">Month</td> <td data-bbox="1408 1337 1673 1378">Quantity (a.i/Ha)</td> <td data-bbox="1680 1337 1930 1378">Quantity (a.i/FFB)</td> </tr> </table>	Month	Quantity (a.i/Ha)	Quantity (a.i/FFB)	Complied
Month	Quantity (a.i/Ha)	Quantity (a.i/FFB)				

		<table border="1"> <tr> <td>April'24</td> <td>0.14</td> <td>0.20</td> </tr> <tr> <td>May'24</td> <td>0.09</td> <td>0.15</td> </tr> <tr> <td>June'24</td> <td>0.08</td> <td>0.19</td> </tr> </table> <p>Lambak Elaeis Estate</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Quantity (a.i/Ha)</th> <th>Quantity (a.i/FFB)</th> </tr> </thead> <tbody> <tr> <td>April'24</td> <td>0.17</td> <td>0.12</td> </tr> <tr> <td>May'24</td> <td>0.00</td> <td>0.13</td> </tr> <tr> <td>June'24</td> <td>0.00</td> <td>0.14</td> </tr> </tbody> </table>	April'24	0.14	0.20	May'24	0.09	0.15	June'24	0.08	0.19	Month	Quantity (a.i/Ha)	Quantity (a.i/FFB)	April'24	0.17	0.12	May'24	0.00	0.13	June'24	0.00	0.14	
April'24	0.14	0.20																						
May'24	0.09	0.15																						
June'24	0.08	0.19																						
Month	Quantity (a.i/Ha)	Quantity (a.i/FFB)																						
April'24	0.17	0.12																						
May'24	0.00	0.13																						
June'24	0.00	0.14																						
7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The required quantities of agrochemicals for various field conditions are documented and justified in Section 16.5 of the Sime Darby Plantation Agriculture Reference Manual. Field implementation aligns with this section of the manual. The estates have adopted a Continuous Improvement Plan, aiming to reduce chemical usage through an Integrated Pest Management Plan. During site visits to all the estates, beneficial plants were observed along estate roads and in immature areas, along with barn owl boxes placed in strategic locations. Paraquat has been eliminated and replaced with alternatives like Glyphosate.</p>	Complied																					
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>As per verification through site visit to field, chemical storage and document review (chemical register, chemical issuance records, chemical application records, there is no prophylactic has been used.</p>	Complied																					
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated</p>	<p>As per verification through site visit to field, chemical storage and document review (chemical register, chemical issuance records,</p>	Complied																					

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	<p>by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> <li>a) Judgment of the threat and verify why this is a major threat</li> <li>b) Why there is no other alternative which can be used</li> <li>c) Which process was applied to verify why there is no other less hazardous alternative</li> <li>d) What is the process to limit the negative impacts of the application</li> <li>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</li> </ul> <p>- Minor compliance -</p>	<p>chemical application records), there is no class 1A and 1B has been used.</p>	
7.2.6	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>The pesticides operators have been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly health surveillance done by the Medical Assistant. Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators based on the PPE issuance forms. Reviewed the training records as per criteria 3.7.2. Sampled the training conducted for pesticide handlers as below</p> <p>Lambak Elaies Estate: 13/05/2024 Bukit Benut Estate: 27/04/2024</p>	Complied
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate's Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the storekeeper was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door,</p>	Complied

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		signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety Data Sheet were available.	
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	<p><b>Lambak Elaies Estate</b></p> <p>Disposed through recycle contractor SS Sxxxx Txxx Exxx dated 04/01/2024(42pcs of 20L empty chemical container, 10kg of small empty container) and 09/05/2023 (53pcs of 20L empty container and 130kgs of small empty cheicl container)</p> <p><b>Bukit Benut POM</b></p> <p>Empty chemical container has been disposed as schedule waste under SW409- Disposed containers, bags or equipment contaminated with chemicals, pesticides, mineral oil or schedule waste and verified schedule waste inventory for January'24 with total 0.5321mt and latest disposal on 20/02/2024 with total 0.5321mt and verified based on consignment note 20244022014W01N9D through licensed contractor Kxxx Axxx Sdn Bhd.</p>	Complied
7.2.9	<b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	<p>There is no aerial spraying for Lambak Elaies Estate and has been verified based on interview and site visit.</p> <p>While for Bukit Benut Estate, verified contract agreement with MXXXXXX AXXXXXX Sdn Bhd dated 01/04/2024. CAAM permit available issued by Pejabat Ketua Pegawai Keselamatan Kerajaan Malaysia dated 24/05/2024 reference CGSO.600-5/6/1 Jld.10 (48)s.</p>	Complied

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		<p>Latest application on 04/07/2024 using Cypermethrin (2L), Antracol (1.5kg), Thiram (1kg), Sonata (250ml) and Bayfolan (500ml). There is no requirement to inform local communities since the management identified there is no affected stakeholders and the location of the nursery which located far from the local communities.</p>	
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p><b>Lambak Elaeis Estate</b></p> <p>Medical Surveillance were conducted in the estate based on the recommendation of the CHRA for workers exposed to hazardous chemicals. Results of annual medical surveillance were available in the estates for verification as follows.</p> <p>The medical surveillance progmmme for the year 2024 has been performed on 14/05/2024 at Klinik Rengam for 19 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work.</p> <p><b>Bukit Benut Estate</b></p> <p>Medical surveillance conducted on 22/06/2024, to Kxxxx Rxxxx and the result is still pending. Previous medical assessment conducted 04/08/2023</p> <p><b>Bukit Benut POM</b></p> <p>Medical surveillance conducted for all workers a per required in CHRA on 24/05/2023 DOSH registration number HQ/16/DOC/00/508 to Dr Lxxx Cxxx Sxxx, Kxxxx Axxxxx. All workers has been identified as fit to work.For year 2024, assessment conducted on 27/05/2024 but the report is still pending.</p>	Complied
7.2.11	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p>	<p>SD Guthrie Berhad (formerly known as Sime Darby Plantation Berhad) has implemented a Gender Policy on Motherhood Responsibilities and Reproductive Rights, which prohibits all</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>confirmed pregnant and breastfeeding women from working with pesticides. This policy has been communicated to workers through induction training for new employees, morning briefings, iCARE Safety and Health Townhall meetings, and displayed on various notice boards within the estate.</p> <p>The estates visited adhered to this policy by prohibiting all confirmed pregnant and breastfeeding women from working with pesticides, as outlined in an internal memo signed by the Assistant Manager. This memo has been posted on notice boards in several strategic locations within the estate. As per verification through medical surveillance and interview, there is no workers with medical restriction that handle chemical.</p>	
<p><b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
<p>7.3.1</p>	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Addressed in the Waste Management Procedure for Estates &amp; Mill dated May 2022 with reference number SD/SDH/GSD/HSE/0522/01, waste management is categorized as follows:</p> <ol style="list-style-type: none"> <li>1. Scheduled Waste</li> <li>2. Hazardous Waste</li> <li>3. Non-Hazardous Waste</li> <li>4. Industrial Waste</li> <li>5. Construction Waste</li> <li>6. Agricultural Waste</li> <li>7. Office Waste</li> </ol>	<p>Non-compliance</p>



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		<p>8. General Waste</p> <p>Minor NC</p> <p>The SW inventory and disposal as procedures was not fully demonstrated.</p> <p>Bukit Benut Estate</p> <p>With reference to the Scheduled Wastes (Hazardous Waste) Management (Doc ID: SD/SDP/PSQM (ESH)/203-EN1) dated 16/02/2015, under clause 6.6.5 Disposal shall be done through DOE registered contractor.</p> <p>Evident the latest disposal record of used PPE under SW409 by Rxxx Mxxx (M) Sdn Bhd using consignment note dated 11.7.2024. Based on Scheduled Waste Inventory for SW 409(PPE), the record is only from 31/01/2024 until 11/07/2024. There is no evident of SW409 (PPE) disposal record before the date. The management informed that previously the used PPEs were disposed by SS Sxxxx Txxxx Exxxx on dated 26/03/2024, 16/11/2023 and 04/07/2023. However, there is no evidence of DOE License for SS Sxxxx Txxxx Exxxx as authorized SW collector</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>The procedure for managing scheduled waste has been established, as outlined in the Waste Management Procedure for Estates &amp; Mill dated May 2022 with reference number SD/SDH/GSD/HSE/0522/01. Additional reference was made to the Guidelines for Packaging, Labelling, and Storage of Scheduled Wastes in Malaysia.</p>	Complied

		<p>Awareness training on scheduled waste management has been conducted on the following dates:</p> <p>Bukit Benut Estate: 16/05/2024</p> <p>Bukit Benut POM: 08/06/2024</p> <p>Lambak Elaeis Estate: 09/05/2024</p> <p>Interviews with the person in charge and workers revealed that they have a good awareness of scheduled waste management practices.</p> <p>Record of Inventory of Schedule Waste and Disposal Record as per details below:</p> <p>Lambak Elaeis Estate</p> <p>Inventory</p> <ul style="list-style-type: none"> <li>• File reference Number: Manual Form Fifth Schedule dated June 2024</li> <li>• Date Reporting: 24/06/2024</li> <li>• Waste Generated: SW102, SW305, SW404</li> </ul> <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> <li>• Disposal consignment note: 202407021303R54V</li> <li>• Date Disposal: 02/07/2024</li> <li>• SW102 – Waste Batteries: 0.0710 MT by Kxxxxx Axxxxx Sdn Bhd.</li> </ul> <p>Sample 2</p> <ul style="list-style-type: none"> <li>• Disposal consignment note: 20240415132X8EKN</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Date Disposal: 15/04/2024</li> </ul> <p>SW305 – Spent Lubricant Oil: 0.200 MT by Rxxx Mxxx (M) Sdn Bhd Bukit Benut POM</p> <p>Inventory</p> <ul style="list-style-type: none"> <li>• File reference Number: JAS.JKL.600-3/1/35</li> <li>• Date Reporting: 02/07/2024</li> <li>• Waste Generated: SW109, SW110, SW206, SW305, SW306, SW322, SW324, SW402, SW409, SW410, SW424, SW427, SW427, SW430</li> </ul> <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> <li>• Disposal consignment note: 20240705094JFDXM</li> <li>• Date Disposal: 05/07/2024</li> <li>• SW430 – Sodium Chloride: 0.4000 MT by Kxxxxx Axxxxx Sdn Bhd</li> </ul> <p>Sample 2</p> <ul style="list-style-type: none"> <li>• Disposal consignment note: 2024070509KQZSFJ</li> <li>• Date Disposal: 05/07/2024</li> <li>• SW409 – Empty Container: 0.1000 MT by Kxxxxx Axxxxx Sdn Bhd</li> </ul> <p>Bukit Benut Estate</p> <p>Inventory</p>	
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		<ul style="list-style-type: none"> <li>• File reference Number: Manual form fifth schedule</li> <li>• Date Reporting: 29/06/2024</li> <li>• Waste Generated: SW409, SW 410</li> </ul> <p>Disposal</p> <p>Sample 1</p> <ul style="list-style-type: none"> <li>• Disposal consignment note: 2024060709PG8ACV</li> <li>• Date Disposal: 07/06/2024</li> <li>• SW404 – Clinical Waste: 0.0081 MT by Kxxxxx Axxxxx Sdn Bhd</li> </ul> <p>Sample 2</p> <ul style="list-style-type: none"> <li>• Disposal consignment note: 20240604108KI4HX</li> <li>• Date Disposal: 04/06/2024</li> <li>• SW305 – Spent Lubricating Oil – 0.0510 MT by Cxxx Cxxxxxx (PG) Sdn Bhd</li> </ul> <p>Minor NC</p> <p>The SW inventory and disposal as procedures was not fully demonstrated.</p> <p>Bukit Benut Estate</p> <p>With reference to the Scheduled Wastes (Hazardous Waste) Management (Doc ID: SD/SDP/PSQM (ESH)/203-EN1) dated 16/02/2015, under clause 6.6.5 Disposal shall be done through DOE registered contractor.</p> <p>Evident the latest disposal record of used PPE under SW409 by Rxxx Mxxx (M) Sdn Bhd using consignment note dated 11.7.2024. Based</p>	
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		on Scheduled Waste Inventory for SW 409(PPE), the record is only from 31/01/2024 until 11/07/2024. There is no evident of SW409 (PPE) disposal record before the date. The management informed that previously the used PPEs were disposed by SS Sxxxx Txxxx Exxxx on dated 26/03/2024, 16/11/2023 and 04/07/2023. However, there is no evidence of DOE License for SS Sxxxx Txxxx Exxxx as authorized SW collector.	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	<p>During the visit to the estates' fields and housing compounds in Bukit Benut POM and its supply base, no open burning was observed. It was confirmed that no open fire was used for waste disposal. SD Guthrie Berhad has a strict no open burning policy. As advocated, the estate practices zero burning. In the replants visited during the audit, it was evident that all palms were felled, shredded, windrowed, and left to decompose. There was no evidence of fire being used to prepare land for replanting in the estate, nor was fire used for waste disposal.</p> <p>Lambak Elaeis Estate Domestic waste was disposed through Landfill. Verification Landfill area at P 07B. Date open was 08/07/2024.</p> <p>Bukit Benut Estate Domestic waste was disposed through Majlis Daerah Simpang Rengam. Sighted waste collection record.</p>	Complied
<b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	A Standard Operating Procedure (SOP) for managing soil fertility to optimize yield and minimize environmental impacts has been established. The preservation of soil fertility is guided by the organization's SOPs, which include the following sections from various documents:	Complied

		<ul style="list-style-type: none"> <li>❖ EQMS chapter B8: Leguminous Cover Crops</li> <li>❖ EQMS chapter B14: Manuring</li> <li>❖ ARM Section 8: Manuring</li> </ul>	
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Foliar and soil sampling were conducted by the Research and Development Department prior to fertilizer recommendations for the upcoming financial year. Leaf and soil nutrient analyses are standard practices for diagnosing fertilizer requirements in oil palms. Leaf sampling is typically conducted annually, while soil sampling is done at five-year intervals.</p> <p>Sampling records were reviewed as follows:</p> <p>Lambak Elaeis Estate:</p> <ul style="list-style-type: none"> <li>• The latest soil sampling was conducted on 01/06/2023, as indicated in report no. S75/2023 dated 02/01/2024.</li> <li>• The latest leaf sampling was conducted on 16/01/2024, as indicated in report no. P033/2023 dated 07/04/2023.</li> </ul> <p>Bukit Benut Estate:</p> <ul style="list-style-type: none"> <li>• The latest soil sampling was conducted on 08/05/2023, as indicated in report no. S81/2023 dated 02/01/2024.</li> </ul> <p>The latest leaf sampling was conducted on 18/03/2024, as indicated in report no. P158/2024 dated 13/05/2024.</p>	Complied
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>The mill disposed EFB by send to neighbouring sister estate as nutrient recycle program. Reviewed the EFB disposal records FY 2024 as follows:</p>	Complied

		<p>The following practices are applied in the estates in relation to the nutrient recycling strategy;</p> <ol style="list-style-type: none"> <li>1. EFB application in designated fields at dosage of 40 mt/ha applied in inter rows subject to Agronomist recommendations.</li> <li>2. Cut frond are stacked in between the palm's rows left to discompose.</li> </ol> <p>The estate has established EFB and Bio-Compost application program FY 2024. Reviewed the application records as to date Apr 2024 as follows:</p> <table border="1" data-bbox="1137 719 1928 1043"> <thead> <tr> <th>Estate</th> <th>Mar 2024</th> <th>Apr 2024</th> <th>May 2024</th> <th>June 2024</th> </tr> </thead> <tbody> <tr> <td>Lambak Elaeis Estate</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Bukit Benut Estate</td> <td>250.11</td> <td>1,031.36</td> <td>1,168.38</td> <td>989.08</td> </tr> </tbody> </table>	Estate	Mar 2024	Apr 2024	May 2024	June 2024	Lambak Elaeis Estate	0.00	0.00	0.00	0.00	Bukit Benut Estate	250.11	1,031.36	1,168.38	989.08	
Estate	Mar 2024	Apr 2024	May 2024	June 2024														
Lambak Elaeis Estate	0.00	0.00	0.00	0.00														
Bukit Benut Estate	250.11	1,031.36	1,168.38	989.08														
7.4.4	<p>Records of fertiliser inputs are maintained.            - Minor compliance -</p>	<p>Fertilizer application was carried out based on recommendations provided by agronomists, which were derived from foliar sampling conducted. Records of fertilizer application were accessible for review at the visited estate. The estate reported the fertilizer application to the Research and Development Carey Island. For details, refer to the 2023 and 2024 Fertilizer Programme and Application Record.</p>	Complied															
<p><b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.</p>																		

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7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.          - Critical (Major) compliance -</p>	<p>Soil maps were readily available at all estates, delineating the various soil series and their respective area percentages within the estate boundaries. Notably, there were no marginal or fragile soils identified across the assessed estates. There is no new oil palm plantings were initiated on steep terrain. This was verified through site visits, interviews, and document verification processes.</p>	Complied
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.          - Minor compliance -</p>	<p>The commitment to protect and conserve biodiversity and ecosystems is articulated in the SD Guthrie Group Sustainability and Quality Policy Statement, signed by the Group Managing Director on 2/12/2019, as well as the Responsible Agriculture Charter. Under section 3.1 of the Responsible Agriculture Charter, specifically 3.1.2, it is stated:</p> <p>"Management of erosion by protection of steep slopes and river reserves within our operations and promote restoration programs."</p> <p>This underscores the company's dedication to managing erosion risks by safeguarding steep slopes and river reserves within its operations, while also actively promoting restoration efforts in relevant areas.</p>	Complied
7.5.3	<p>There is no new planting of oil palm on steep terrain.          - Minor compliance -</p>	<p>No new planting conducted at all estates visited as verified and sighted during site visit.</p>	Complied
<p><b>Criterion 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>			
7.6.1	<p><b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.          - Critical (Major) compliance -</p>	<p>Soil series and topography maps were observed at the sampled estates, revealing no categorization of fragile soils within the sampled estates. During planning for replanting, the estate considered factors such as land terrain, drainage, and road systems. The table below illustrates the identified soil series for each estate:</p>	Complied



		<p>Lambak Elaeis Estate</p> <table border="1"> <thead> <tr> <th>Soil series</th> <th>Percentage, %</th> </tr> </thead> <tbody> <tr> <td>C1, Jerangau</td> <td>0.99</td> </tr> <tr> <td>C1, Rengam</td> <td>69.56</td> </tr> <tr> <td>C3, Local Alluvium</td> <td>24.12</td> </tr> <tr> <td>C4, Masai</td> <td>5.34</td> </tr> </tbody> </table> <p>Bukit Benut Estate</p> <table border="1"> <thead> <tr> <th>Soil series</th> <th>Percentage, %</th> </tr> </thead> <tbody> <tr> <td>C1, Jerangau</td> <td>8.20</td> </tr> <tr> <td>C1, Rengam</td> <td>61.14</td> </tr> <tr> <td>C3, Bukit Lunchu</td> <td>30.65</td> </tr> </tbody> </table> <p>During verification through site visits, it was confirmed that the replanting did not involve planting on marginal or fragile soils.</p>	Soil series	Percentage, %	C1, Jerangau	0.99	C1, Rengam	69.56	C3, Local Alluvium	24.12	C4, Masai	5.34	Soil series	Percentage, %	C1, Jerangau	8.20	C1, Rengam	61.14	C3, Bukit Lunchu	30.65	
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7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>Soil series and topography maps were available for the sampled estates, and no fragile soil was categorized within these estates. In planning for replanting, the estate considered factors such as land terrain, drainage, and road systems.</p>	Complied																		

7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>The Agronomy Advisory and Services Department carried out assessments and supplied the estates with topography maps. Below are the sampled topography details observed at the estates:</p> <table border="1" data-bbox="1137 491 1930 1011"> <thead> <tr> <th>Degree</th> <th>Lambak Elaeis Estate</th> <th>Bukit Benut Estate</th> </tr> </thead> <tbody> <tr> <td>0°-2° Flat</td> <td>20.64</td> <td>8.93</td> </tr> <tr> <td>2°-6° Undulating</td> <td>62.16</td> <td>43.26</td> </tr> <tr> <td>6°-12° Rolling</td> <td>16.89</td> <td>35.57</td> </tr> <tr> <td>12°-20° Gentle Slope</td> <td>0.31</td> <td>11.00</td> </tr> <tr> <td>20°-25° Hilly</td> <td>0.01</td> <td>1.04</td> </tr> <tr> <td>&gt;25° Steep</td> <td>0.00</td> <td>0.00</td> </tr> </tbody> </table>	Degree	Lambak Elaeis Estate	Bukit Benut Estate	0°-2° Flat	20.64	8.93	2°-6° Undulating	62.16	43.26	6°-12° Rolling	16.89	35.57	12°-20° Gentle Slope	0.31	11.00	20°-25° Hilly	0.01	1.04	>25° Steep	0.00	0.00	Complied
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<p><b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>																								
7.7.1	<p><b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil was identified at any of the estates visited within the SOU 22 Bukit Benut Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estates. Therefore, the criteria regarding peat soil were not applicable.</p>	Not Applicable																					
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p><b>PROCEDURAL NOTE:</b></p>	<p>No peat soil was identified at any of the estates visited within the SOU 22 Bukit Benut Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the</p>	Not Applicable																					

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	<p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	<p>absence of any new planting activities in the visited estates. Therefore, the criteria regarding peat soil were not applicable.</p>	
7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil was identified at any of the estates visited within the SOU 22 Bukit Benut Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estates. Therefore, the criteria regarding peat soil were not applicable.</p>	Not Applicable
7.7.4	<p><b>(C)</b> A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil was identified at any of the estates visited within the SOU 22 Bukit Benut Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estates. Therefore, the criteria regarding peat soil were not applicable.</p>	Not Applicable
7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil was identified at any of the estates visited within the SOU 22 Bukit Benut Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estates. Therefore, the criteria regarding peat soil were not applicable.</p>	Not Applicable

7.7.6	<p><b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil was identified at any of the estates visited within the SOU 22 Bukit Benut Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estates. Therefore, the criteria regarding peat soil were not applicable.</p>	Not Applicable							
7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil was identified at any of the estates visited within the SOU 22 Bukit Benut Certification Unit. Verification conducted through site visits, document checks, and interviews confirmed the absence of any new planting activities in the visited estates. Therefore, the criteria regarding peat soil were not applicable.</p>	Not Applicable							
<p><b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater.</p>										
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>A water management plan has been established at SD Guthrie SOU 22 Bukit Benut POM Certification Unit, with the plan being reviewed annually. The latest plan covers FY2023 and FY2024, with the following objectives and action plan details:</p> <p>Lambak Elaeis Estate</p> <table border="1" data-bbox="1137 1085 1930 1362"> <thead> <tr> <th>Objective</th> <th>Category</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Protection of watercourse and wetland</td> <td rowspan="2">River stream</td> <td>To monitor the water quality by sending water analysis by R&amp;D</td> </tr> <tr> <td>To do investigation for off spec parameters in the water sampling result</td> </tr> </tbody> </table>	Objective	Category	Action Plan	Protection of watercourse and wetland	River stream	To monitor the water quality by sending water analysis by R&D	To do investigation for off spec parameters in the water sampling result	Complied
Objective	Category	Action Plan								
Protection of watercourse and wetland	River stream	To monitor the water quality by sending water analysis by R&D								
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		Water consumption & Contingency Plan during water shortage, Dry spell or severe water pollution	Water consumption	To purchase water from vendor / sister estates		
				Consumption of natural water for operation use		
			Daily consumption	Recording of monthly water Consumption from SAJ		
		<b>Bukit Benut POM</b>				
		Objective	Category	Action Plan		
		Water contingency plan	Water Shortage / dry Spell	Monitoring of water usage		
				To supply SAJ for Mill Operation		
		To monitor the usage of treated water in monthly basis Monitoring	Daily consumption	Awareness to workers on water consumption with care		
				Maintenance of pond		
				To maintain availability of safety signage		

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		<table border="1"> <tr> <td data-bbox="1137 368 1317 523">Protection of water course and wetland</td> <td data-bbox="1317 368 1464 523">Water catchment</td> <td data-bbox="1464 368 1928 523">Water analysis results by R&amp;D</td> </tr> <tr> <td colspan="3" data-bbox="1137 544 1928 587">Bukit Benut Estate</td> </tr> <tr> <td data-bbox="1137 592 1317 655">Objective</td> <td data-bbox="1317 592 1464 655">Category</td> <td data-bbox="1464 592 1928 655">Action Plan</td> </tr> <tr> <td data-bbox="1137 660 1317 788" rowspan="2">Protection of water course</td> <td data-bbox="1317 660 1464 788" rowspan="2">Water catchment pond</td> <td data-bbox="1464 660 1928 724">No chemical handling activities</td> </tr> <tr> <td data-bbox="1464 729 1928 788">To display warning signage</td> </tr> <tr> <td data-bbox="1137 793 1317 920" rowspan="2">Monitoring of water usage</td> <td data-bbox="1317 793 1464 920">Daily consumption</td> <td data-bbox="1464 793 1928 920">To do monitoring the water quality</td> </tr> <tr> <td data-bbox="1317 925 1464 984">SAJ water</td> <td data-bbox="1464 925 1928 984">Recording of monthly consumption</td> </tr> <tr> <td colspan="3" data-bbox="1137 989 1928 1093">This plan aims to ensure efficient water management and conservation across the estates, addressing both quality and quantity concerns while promoting sustainable practices.</td> </tr> </table>	Protection of water course and wetland	Water catchment	Water analysis results by R&D	Bukit Benut Estate			Objective	Category	Action Plan	Protection of water course	Water catchment pond	No chemical handling activities	To display warning signage	Monitoring of water usage	Daily consumption	To do monitoring the water quality	SAJ water	Recording of monthly consumption	This plan aims to ensure efficient water management and conservation across the estates, addressing both quality and quantity concerns while promoting sustainable practices.			
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7.8.2	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. Riparian buffer zones have been identified and demarcated. Signage has been placed. No chemicals and fertilizer application observed been used in their maintenance. In some areas Guatemala grass were planted along the riverbanks. Management of riparian zone is guided by River Reserve Management (Management of River Reserve in SD</p>	Complied																					

Guthrie Berhad; dated April 2014). The widths of the buffer zones are guided by the following measurements:

River width (meter)	Minimum width for river reserve (m) for peninsular Malaysia and Sarawak
1-5	5
5-10	10
10-20	20
20-40	40
>40	50

There is availability of Sungai Melantai at Bukit Benut Estate. Buffer zone has been established and marked with white paint. No evidence of chemical applications along the buffer zone. The river were desilt on annual basis by the Department Irrigation and Drainage. The estate conducted river water sampling on annually basis.

Bukit Benut Estate

Industrial effluent

- Date of report: 14/05/2024
- Report No: IE763/2024
- Date Tested: 29/05/2024

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		<p>There is off spec result for BOD &amp; COD. Estate has do the investigation dated 14/05/2024 and sent for resampling dated 29/05/2024. Result were in progress.</p> <p><u>Bukit Benut POM</u></p> <p><u>Microbiology</u></p> <ul style="list-style-type: none"> <li>• Date of report: 25/04/2024</li> <li>• Report No: ML484/2024</li> <li>• Date Tested: 15/05/2024</li> </ul> <p><u>Effluent Analysis</u></p> <ul style="list-style-type: none"> <li>• Date of report: 27/05/2024</li> <li>• Report No: IE923/2024</li> <li>• Date Tested: 26/06/2024</li> </ul> <p><u>Bukit Benut Estate</u></p> <p><u>Industrial effluent</u></p> <ul style="list-style-type: none"> <li>• Date of report: 07/05/2024</li> <li>• Report No: IE614/2024</li> <li>• Date Tested: 19/04/2024</li> </ul> <p><u>Pesticide Water Analysis</u></p> <ul style="list-style-type: none"> <li>• Date of report: 01/04/2024</li> <li>• Report No: PL245/2024</li> </ul> <p>Date Tested: 21/03/2024</p>	
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<p>7.8.3</p>	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -</p>	<p>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No overflow was observed, and flow meter reading was recorded daily.</p> <p>Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is quarterly monitored as per OER. Effluent Analysis conducted by accredited laboratory, SD Guthrie Berhad and submitted to DOE every 3 months through OER (Online Environmental Report) and in compliance with mill's compliance schedule for quarterly submission. Refer to the latest report for dated April 2024. Monthly analysis was done for final discharge point. Total of 8 parameters (pH, BOD3, COD, TS, SS, TN, AN and O&amp;G) were tested. Latest analysis report for 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup> 4<sup>th</sup> Quarter quarters of year 2023 &amp; 2024.</p> <table border="1" data-bbox="1137 895 1924 1331"> <thead> <tr> <th>Report Date</th> <th>Quarter/Week</th> <th>BOD (Limit=2500mg/L)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">04/04/2024</td> <td>1<sup>st</sup>week/1<sup>st</sup>month</td> <td>393.00</td> </tr> <tr> <td>5<sup>th</sup>week/2<sup>nd</sup>Month</td> <td>370.00</td> </tr> <tr> <td>9<sup>th</sup>week/3<sup>rd</sup>Month</td> <td>245.00</td> </tr> <tr> <td rowspan="2">11/01/2024</td> <td>1<sup>st</sup>week/1<sup>st</sup>month</td> <td>193.00</td> </tr> <tr> <td>5<sup>th</sup>week/2<sup>nd</sup>Month</td> <td>225.00</td> </tr> </tbody> </table>	Report Date	Quarter/Week	BOD (Limit=2500mg/L)	04/04/2024	1 <sup>st</sup> week/1 <sup>st</sup> month	393.00	5 <sup>th</sup> week/2 <sup>nd</sup> Month	370.00	9 <sup>th</sup> week/3 <sup>rd</sup> Month	245.00	11/01/2024	1 <sup>st</sup> week/1 <sup>st</sup> month	193.00	5 <sup>th</sup> week/2 <sup>nd</sup> Month	225.00	<p>Complied</p>
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7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Mill has maintained monitoring of water usage for processing FFB which are recorded monthly. Water for processing is abstracted from water catchment by using pump. The trend of water usage is tandem with volume of FFB process. Refer Water Usage Record Bukit Benut POM. Average data as below:	Complied																	

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		Year	Water/L	FFB Processed, MT	Water/FFB									
		2023	93,582.81	81,311.30	1.15									
<b>Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised</b>														
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Management Plan 2024. The document was reviewed/updated on January 2024. Among the Energy Management Plan were:</p> <ul style="list-style-type: none"> <li>• Worker’s housing inspection to ensure no illegal wiring</li> <li>• Preventive maintenance programme for estate vehicles</li> <li>• Training / Educate workers on fuel saving practices</li> <li>• Regular maintenance of transport @ machine as per recommendation</li> </ul> <p>There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p> <p>The mill and estate monitored the diesel usage per ton FFB process/production on monthly basis. Reviewed the data FY 2023 as follows:</p> <table border="1"> <thead> <tr> <th>Estate / Mill</th> <th>Diesel, (MT)</th> <th>FFB, (MT)</th> <th>Diesel / FFB (MT)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>				Estate / Mill	Diesel, (MT)	FFB, (MT)	Diesel / FFB (MT)					Complied
Estate / Mill	Diesel, (MT)	FFB, (MT)	Diesel / FFB (MT)											

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		Lambak Estate	Elaeis	80,614.00	45,890.70	1.76	
		Bukit Benut POM		10,524.00	81,311.30	0.14	
		Bukit Benut Estate		67,765.00	32,159.00	2.11	
<b>Criterion 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.							
7.10.1	<b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -	<p>The GHG emissions are identified and assessed for the unit certification by sustainability team. RSPO GHG Calculator version 4 is used. The consumption of fertilisers and diesel were verified through Estates:</p> <ul style="list-style-type: none"> <li>• FFB record book</li> <li>• Stock book</li> <li>• Monthly stock issue</li> <li>• Stock requisition note Mill</li> <li>• Mill Month End Production Report</li> <li>• Monthly production report</li> <li>• Flowmeter &amp; running hours record book</li> <li>• Bio-gas generation daily monitoring log sheet</li> </ul> <p>Effluent analysis report Based on the verification of records; all the sampled issuance was traceable</p>					Complied
7.10.2	<b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from	Not applicable since no new development by the certification unit.					Not Applicable

	<p>the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>										
<p>7.10.3</p>	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Assessment of all polluting activities was conducted under Environmental Risk Assessment for identifying activities that contributes significant impact to environment including gaseous emission. Among the plan for pollution preventive action Plan FY 2023/2024 were:</p> <p>Lambak Elaeis Estate</p> <table border="1" data-bbox="1137 751 1930 1299"> <thead> <tr> <th data-bbox="1137 751 1532 815">Objective</th> <th data-bbox="1538 751 1930 815">Action Plan</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 820 1532 1043" rowspan="2">To minimize pollution from estate activities</td> <td data-bbox="1538 820 1930 884">To Plant LCC</td> </tr> <tr> <td data-bbox="1538 888 1930 1043">Planting vetiver grass along side drain, water channelling at path, palm debris at lips of the terrace, stop bund</td> </tr> <tr> <td data-bbox="1137 1048 1532 1176" rowspan="2">Management of schedule waste</td> <td data-bbox="1538 1048 1930 1176">To ensure all schedule waste is stored and disposed as per legal requirement</td> </tr> <tr> <td data-bbox="1538 1181 1930 1299">To provide regular inspection for estate vehicle for operation purposes</td> </tr> </tbody> </table>	Objective	Action Plan	To minimize pollution from estate activities	To Plant LCC	Planting vetiver grass along side drain, water channelling at path, palm debris at lips of the terrace, stop bund	Management of schedule waste	To ensure all schedule waste is stored and disposed as per legal requirement	To provide regular inspection for estate vehicle for operation purposes	<p>Complied</p>
Objective	Action Plan										
To minimize pollution from estate activities	To Plant LCC										
	Planting vetiver grass along side drain, water channelling at path, palm debris at lips of the terrace, stop bund										
Management of schedule waste	To ensure all schedule waste is stored and disposed as per legal requirement										
	To provide regular inspection for estate vehicle for operation purposes										

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			<p>To maintain oil trap as to prevent oil spillage and to provide proper spill kit</p>	
		<p>To ensure the activity do not pollute the environment</p>	<p>To ensure mixing activity at dedicated area</p>	
			<p>No spraying near the water catchment area</p>	
			<p>To erect signages at workers housing complex "Dilarang melakukan pembakaran terbuka".</p>	
			<p>Weekly housing inspection</p>	
		<p>Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.</p> <p>As prescribed under DOE's Compliance Schedule, the mill is obliged to conduct stack sampling minimum once a year. Below are the verified reports (Isokinetic Stack &amp; Air Emission Monitoring Report):</p> <p><u>Year 2023</u></p> <ul style="list-style-type: none"> <li>• Report no.: PAC-AE-230913</li> <li>• Report date: 11/09/2023</li> <li>• Result: Dust: 46.00 mg/m<sup>3</sup> (B5) vs limit 150, CO: 542.00 mg/m<sup>3</sup> vs limit 1000 @ 12% CO<sub>2</sub></li> </ul>		

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		<p>For Air Pollution Control System, management use Electrostatic Precipitator (ESP) for monitoring. Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were monitored.</p> <p>Sighted Online Environmental Reporting (OER) has been submitted to DOE on quarterly basis. The result within parameter as per "Jadual Pematuhan" for DOE Licence No: 004747.</p> <p>Environmental audit by 3<sup>rd</sup> party has been conducted annually by daya Eco Techno Sdn Bhd dated 28/01/2024. Report was available for verification.</p> <p>Latest DOE visit was sighted on 06/03/2024. Refer DOE Visiting Book.</p>	
<b>Criterion 7.11:</b> Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>Visit to the replanting areas in sampled estates confirmed that the land for replanting is not prepared by burning. Interview with the workers and management indicated that they do not prepare land for replating by burning. Verification through document review, interview and site visit confirmed that there is no replanting prepared by burning. Refer Zero open burning policy as per SOP Section B2 - Felling/Land Clearing &amp; Land Preparation dated November 2008. Management complying with the Malaysian environmental law – EQA and Regulations 1974. No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling &amp; chipping, cambering/land forming and path construction.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p>	<p>Fire prevention measure has been established. Refer Emergency Preparedness and Response Procedures. Refer document no. UM/HSE/SP/02. Hotspot monitoring managed by HQ (Fire Hotspot</p>	Complied

	- Minor compliance -	Monitoring Team) – if any fire is detected, inform estate. SD Guthrie Berhad was engaged the Smart Hotspot Alert that monitored by satellite VIIRS for fire prevention. Sime Darby Daily Hotspot Monitoring system has been in place since November 2013 using NASA satellite data. The system monitors any possible occurrence of fire within or nearby the concession areas throughout SD Guthrie Berhad operation globally. At the estates level, there are fire prevention team established. Among the mechanisms to prevent fire are training on firefighting for the ERT, preparing the fire-fighting facilities such as tractor mounted with water bowser and submersible water pump.	
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	There is evidence that management has engaged with stakeholders regarding on fire prevention and control measures. Refer sample of matters stated details on Fire Prevention in the Stakeholder meeting:  Lambak Elaeis Estate: 26/03/2024 Bukit Benut Estate: 26/03/2024	Complied
<b>Criterion 7.12:</b> Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. 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 -	The Certification Unit and supply base have not carried out any new plantings since November 2005. Therefore, this indicator is not applicable during this assessment. The immature areas are replanting areas.	Complied
7.12.2	<b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:	The High Conservation Value (HCV) Re-assessment for Bukit Benut and Ulu Remis was conducted by the Group Sustainability	Complied



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	<p>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.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b> Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance -</p>	<p>Department (GSD) is available for verification. The HCVs identified in Bukit Benut are as follows:</p> <table border="1" data-bbox="1137 432 1926 730"> <thead> <tr> <th>Operating unit</th> <th>HCV area</th> <th>Ha</th> <th>HCV type</th> </tr> </thead> <tbody> <tr> <td>Lambak Elaeis Estate</td> <td>Pond, Natural Pond, Water catchment</td> <td>2.65</td> <td>HCV 4</td> </tr> <tr> <td>Bukit Benut Estate</td> <td>River Reserve (Sungai Melantai), pond, water catchment</td> <td>24.18</td> <td>HCV 4</td> </tr> <tr> <td colspan="2">Total</td> <td>26.83</td> <td></td> </tr> </tbody> </table> <p>As per site verification with land statement and interview with stakeholder no new planting was available in sample estate.</p>	Operating unit	HCV area	Ha	HCV type	Lambak Elaeis Estate	Pond, Natural Pond, Water catchment	2.65	HCV 4	Bukit Benut Estate	River Reserve (Sungai Melantai), pond, water catchment	24.18	HCV 4	Total		26.83		
Operating unit	HCV area	Ha	HCV type																
Lambak Elaeis Estate	Pond, Natural Pond, Water catchment	2.65	HCV 4																
Bukit Benut Estate	River Reserve (Sungai Melantai), pond, water catchment	24.18	HCV 4																
Total		26.83																	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not Applicable	Not Applicable																
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -</p>	<p>HCV management Plan has been done FY2024. Among the plan tabulated in the table below:</p> <table border="1" data-bbox="1137 959 1926 1311"> <thead> <tr> <th>Objective</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Protection of erosion prone area</td> <td>Roadside pit</td> </tr> <tr> <td>Road patching by crusher run</td> </tr> <tr> <td>Natural vegetation</td> </tr> <tr> <td>Management of human wildlife conflict</td> <td>To train / brief workers on ERT species</td> </tr> </tbody> </table>	Objective	Action Plan	Protection of erosion prone area	Roadside pit	Road patching by crusher run	Natural vegetation	Management of human wildlife conflict	To train / brief workers on ERT species	Complied								
Objective	Action Plan																		
Protection of erosion prone area	Roadside pit																		
	Road patching by crusher run																		
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Management of human wildlife conflict	To train / brief workers on ERT species																		

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		<table border="1"> <tr> <td data-bbox="1126 362 1529 459"></td> <td data-bbox="1529 362 1933 459">Recording of wildlife sighted in HCV monitoring report</td> </tr> <tr> <td data-bbox="1126 459 1529 788" rowspan="4">Enhancement of HCV areas / biodiversity in the estates</td> <td data-bbox="1529 459 1933 523">To erect signage of HCV</td> </tr> <tr> <td data-bbox="1529 523 1933 587">To erect warning signage</td> </tr> <tr> <td data-bbox="1529 587 1933 684">To observe no sign of soil erosion</td> </tr> <tr> <td data-bbox="1529 684 1933 788">No encroachment near water stream</td> </tr> </table>		Recording of wildlife sighted in HCV monitoring report	Enhancement of HCV areas / biodiversity in the estates	To erect signage of HCV	To erect warning signage	To observe no sign of soil erosion	No encroachment near water stream	
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Enhancement of HCV areas / biodiversity in the estates	To erect signage of HCV									
	To erect warning signage									
	To observe no sign of soil erosion									
	No encroachment near water stream									
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>Training on HCV has been conducted as below:          Bukit Benut Estate: 03/05/2024          Lambak Elaeis Estate: 15/01/2024          Sighted evidence of training material, attendance and photos. Based on interview with management and workers, they have good understanding on HCV matters.</p>	Not Applicable							
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in</p>	<p>Based on the biodiversity report, there was no RTE species found in all the estates. Nonetheless, the monitoring plan of wildlife was established and implemented. Education about the status of RTE</p>	Complied							

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	<p>place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>has been given to workforce through a muster briefing from time to time. Signage to restrict hunting and intrusion have been put up at many places at the estates especially at the points of entry to create awareness among the workers and surrounding communities.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>Educational activities on RTE species were done through a few means such as briefings/training and no hunting signage. Interview with workers showed that they have a good understanding in the restriction of hunting or endangering the RTE species. Sighted the management also conducted the RTE monitoring, sample in Bukit Benut Estate and Lambak Elaeis Estate. Refer HCV monitoring latest record for the month of May and June 2024.</p>	Complied
7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 22 estates. There is no land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018. Hence, the requirement under this indicator does not apply.</p>	Not Applicable

**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2023** for **SOU 22- Bukit Benut Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2023** for **SOU 22- Bukit Benut Oil Mill** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.62
PKO	0.62

Extraction	%
OER	20.32
KER	4.98

Production	t/yr
FFB Process	81,807.64
CPO Produced	16,622.77
PKO Produced	4,071.05

Land Use	Ha
OP Planted Area	5,881.42
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	26.83
<b>Total</b>	<b>5,908.25</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	52,909.91	0.73	6,155.77	0.64	0.00	0.00	59,065.68	0.73
CO <sub>2</sub> Emission from fertilizer	5,815.73	0.08	380.75	0.04	0.00	0.00	6,196.48	0.08
NO <sub>2</sub> Emission	2,898.07	0.04	196.51	0.02	0.00	0.00	0.00	0.04
Fuel Consumption	428.13	0.01	32.08	0.00	0.00	0.00	3,094.58	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	460.21	0.00
<b>Sink</b>								
Crop Sequestration	-50,151.61	-8.49	-5,780.69	-0.60	0.00	0.00	-55,932.30	-8.49
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>11,900.24</b>	<b>2.02</b>	<b>984.41</b>	<b>0.10</b>	0.00	0.00	<b>12,884.65</b>	<b>2.02</b>

*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	0.00	0.00
Fuel Consumption	1.82	0.00
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>1.82</b>	<b>0.00</b>

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

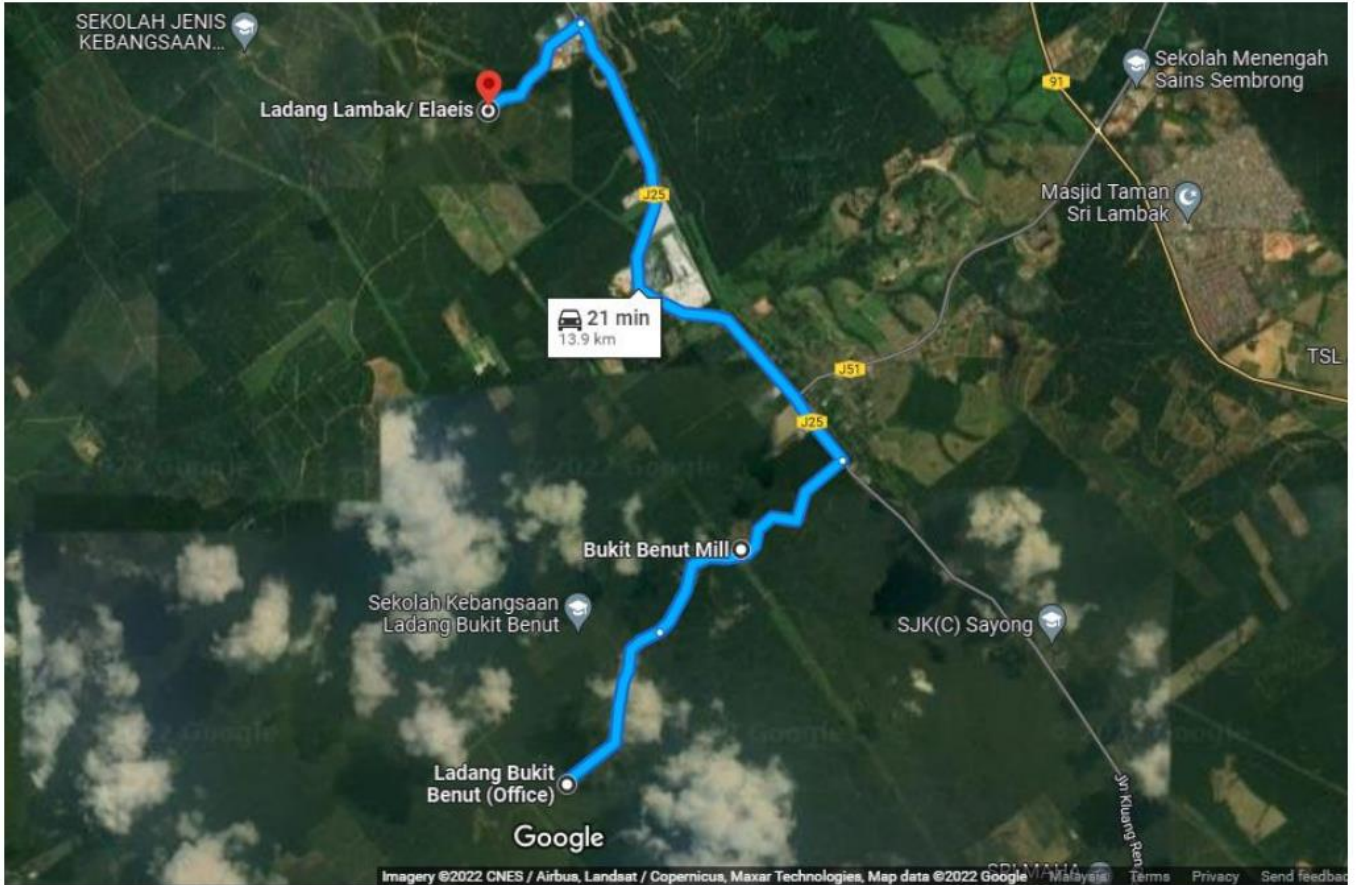
Emissions	tCO <sub>2</sub> e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

\*This mill has no kernel crusher operation.

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

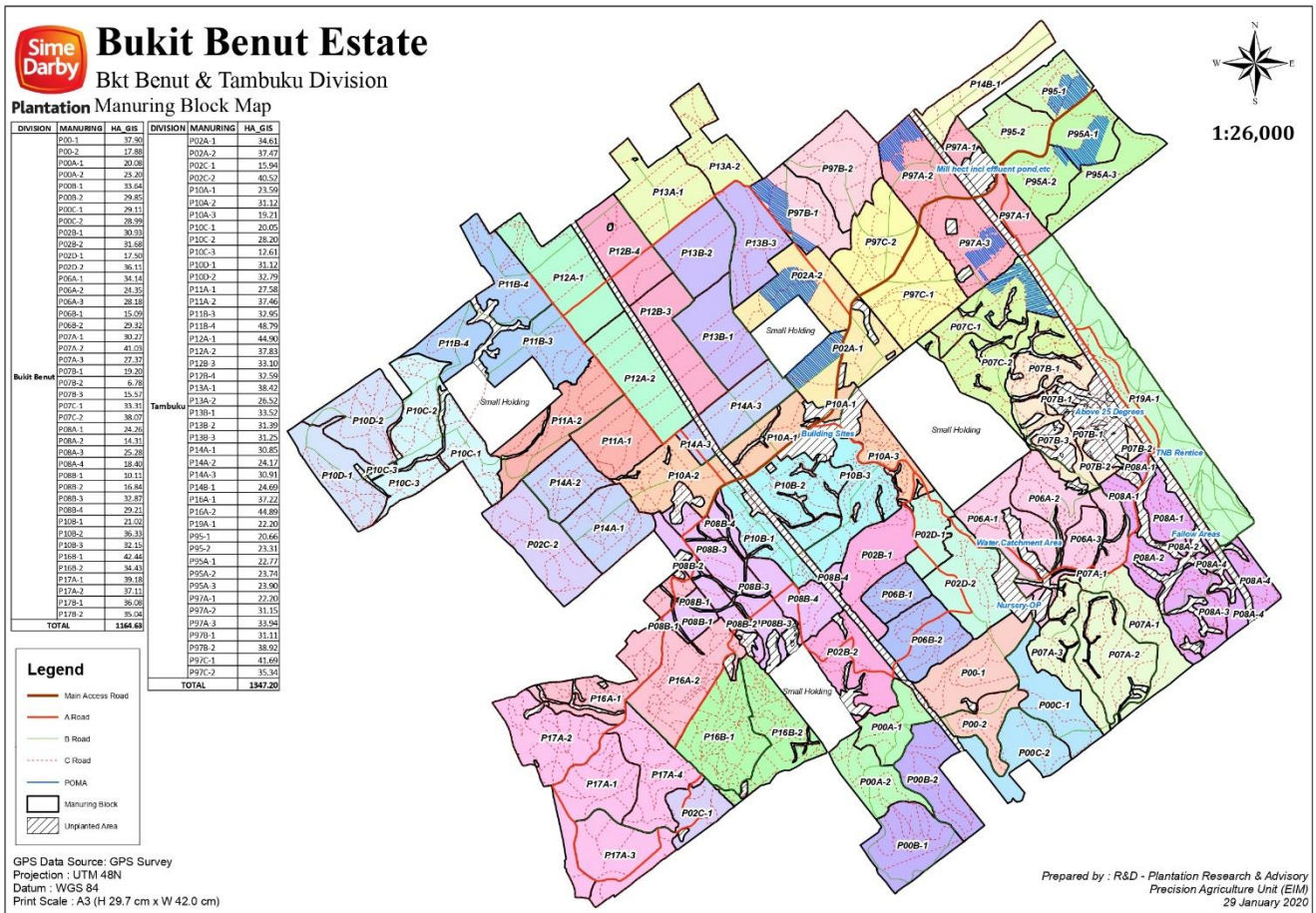
<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

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

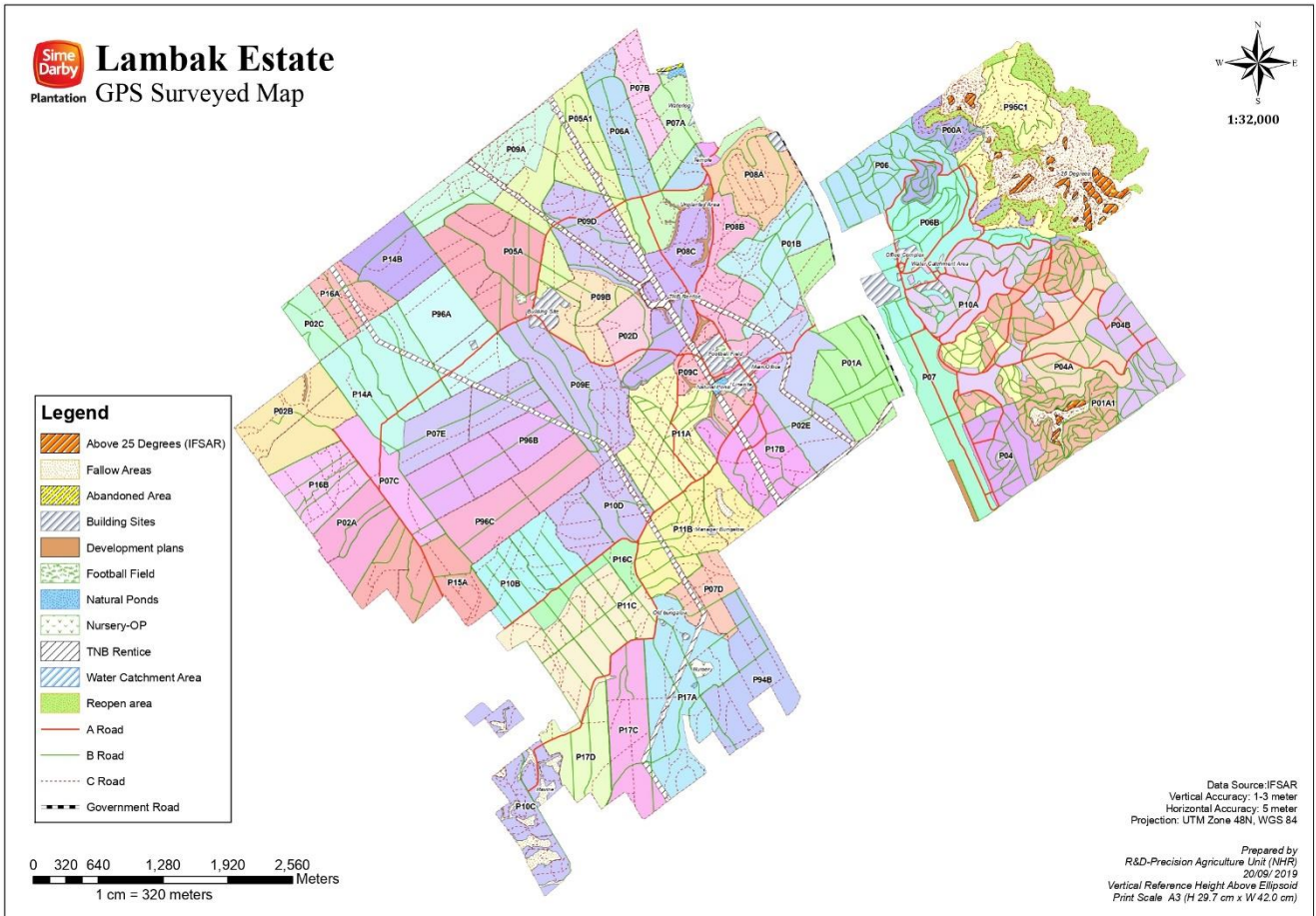




**Appendix D: Estate Field Map**



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**Appendix E: List of Smallholder Registered and/or sampled**

Sampling Group	Current Certification	Scope Extension	Other: <i>Please specify</i>
Risk Factor Applied	N/A	N/A	N/A
Justification of Risk Factor Applied			
Number of samples			
Remarks			
Note Not applicable since there is no smallholders			

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
	Nil								
<b>Total</b>									
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