

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

☐ Initial Assessment

☒ Annual Surveillance Assessment (2_4)

☐ Recertification Assessment (Choose an item.)

☒ Extension of Scope

Client Company Name / Parent Company:

SD Guthrie Berhad

(formerly known as Sime Darby Plantation Berhad)

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:

Strategic Operating Unit (SOU 9) – West Palm Oil Mill

Location of Certification Unit:

Carey Island 42960, Selangor, Malaysia

Date of Final Report:

19/07/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	SD Guthrie Berhad (<i>formerly known as Sime Darby Plantation Berhad</i>)		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	07/09/2004
Address	Level 11, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 9) – West Palm Oil Mill		
Location / Address	Kilang Kelapa Sawit West, Carey Island 42960, Selangor, Malaysia		
Website	www.sdguthrie.com		
Management Representative	Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, GSD) Md Rapit Bin Suman (SOU Chairman)	E-mail	shylaja.vasudevan@sdguthrie.com rapit.suman@sdguthrie.com
Telephone	+60 3-7848 4000	Facsimile	+60 3-7848 4363
Note: A significant change was initiated by the management of Sime Darby Plantation Berhad (also known as "SD Plantation" or "Company"). On 31 May 2024, they sent an email to the RSPO Secretariat, announcing their official name change to SD Guthrie Berhad. This change was further confirmed on 04 June 2024, through an announcement on the company's official website. By 11 June 2024, the RSPO Secretariat acknowledged this change and updated the company name in the membership account to SD Guthrie Berhad, marking the completion of the transition process. Now, the company formerly known as Sime Darby Plantation Berhad operates under the new name, SD Guthrie Berhad.			

2. Certification Information			
Certificate Number	RSPO 543594	Certificate Start Date	19/05/2020
Date of First Certification	19/5/2010	Certificate Expiry Date	18/05/2025
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> The assessment aimed to conduct annual surveillance of the existing certification. Additionally, during this assessment, the audit team also conducted the Extension of Scope Assessment as to adding the Mass Balance Supply Chain Module to the existing Scope of Certification. Determination of the conformity of the client's management system, or parts of it, with audit criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment		

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	<input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_4) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 of the RSPO P&C 2018		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	50 mt/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 682052	MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills	BSI Services Malaysia Sdn Bhd	12/02/2028
MSPO 690774	MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn Bhd	12/02/2028

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
West Palm Oil Mill	KKS West, Carey Island, 42960 Selangor, Malaysia	2° 54' 18.35" N	101° 21' 36.59" E
West Estate	Ladang West, Carey Island 42960, Selangor, Malaysia	2° 53' 22.11" N	101° 21' 38.91" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes	
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
West Estate	5,041.72	101.79	558.00	5,701.51	88.43
Total	5,041.72	101.79	558.00	5,701.51	88.43
Note: Difference by 3.64 ha comparing to previous audit due to PAU area survey in December 2023 which has been classified as infrastructure which is field roads.					

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
West Estate	670.58	1,883.12	2,487.02	1.00	4,371.14	670.58
Total (ha)	670.58	1,883.12	2,487.02	1.00	4,371.14	670.58

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimate (May'23 – Apr'24)	Actual (Feb'23-Jan'24)		Forecast (May'24-Apr'24)
		Previous license period (Feb'23 – Apr'23)	Current license period (May'23 – Jan'24)	
West Estate	123,966.69	18,129.45	64,009.15	90,002.42
Total	123,966.69	82,138.60		IP 90,001.42
				MB 1.00

Notes:

Despite adding the MB Module in the Scope of Certification, West Palm Oil Mill still only processes FFBs from its owned supply base (West Estate) and other SDP owned plantations/estates that are certified against the RSPO P&C.

In line with this operational framework, any RSPO Identity Preserved (IP) Certified Sustainable Palm Oil (CSPO) or RSPO IP Certified Sustainable Palm Kernel (CSPK) products are only downgraded to RSPO Mass Balance (MB) CSPO or RSPO MB CSPK after being loaded into the truck tank or truck trailer for transportation to the refinery or KCP, as determined by the Global Trading Marketing (GTM) Department.

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.

Actual production is 66% decreased from the total estimate which due to long drought season that affect the crop production and high forecast during the previous year

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimate (May'23 – Apr'24)	Actual (Feb'23-Jan'24)		Forecast (May'24-Apr'24)
		Previous license period (Feb'23 – Apr'23)	Current license period (May'23 – Jan'24)	
Bukit Talang Estate		0.00	31.71	
Dusun Durian Estate		1,580.78	0.00	
East Estate		16,430.31	48,811.41	
Sepang Estate		140.11	462.39	

Sg Buloh Estate		0.00	149.15	
Total		67,605.86		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Forecast (May'23 – Apr'24)	Actual (Feb'23-Jan'24)		Forecast (May'24-Apr'24)
		Previous license period (Feb'23 – Apr'23)	Current license period (May'23 – Jan'24)	
N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A		N/A

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Feb-23	14,832.76	0.00	14,832.76
2	Mar-23	11,639.31	0.00	11,639.31
3	Apr-23	9,808.58	0.00	9,808.58
4	May-23	11,462.40	0.00	11,462.40
5	Jun-23	11,079.13	0.00	11,079.13
6	Jul-23	14,475.03	0.00	14,475.03
7	Aug-23	13,659.63	0.00	13,659.63
8	Sep-23	13,931.28	0.00	13,931.28
9	Oct-23	17,063.00	0.00	17,063.00
10	Nov-23	15,405.58	0.00	15,405.58
11	Dec-23	10,477.52	0.00	10,477.52
12	Jan-24	5,910.24	0.00	5,910.24
TOTAL		149,744.46	0.00	149,744.46

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10. Summary of Certified Tonnage (MT) (not applicable for ISS)				
Estimate (May'23 – Apr'24)	Actual (Feb'23-Jan'24)		Forecast (May'24-Apr'24)	
	Previous license period (Feb'23 – Apr'23)	Current license period (May'23 – Jan'24)		
FFB	FFB		FFB	
*152,169.48 mt (123,966.69 mt + 28,202.79 mt)	36,280.65 mt	113,463.81 mt	IP	90,001.42 mt
	TOTAL	149,744.46 mt	MB	1.00 mt
CPO (OER:20.40%)	CPO (OER:19.56%)		CPO (OER:21.00%)	
*31,039.72 mt (24,585.95 mt + 6,453.77 mt)	7,097.11 mt	22,815.33 mt	IP	18,899.51 mt
	TOTAL	29,912.44 mt	MB	1.00 mt
PK (KER: 4.74%)	PK (KER:4.55%)		PK (KER:4.75%)	
*7,219.81 mt (5,968.51 mt + 1,251.30 mt)	1,651.22 mt	5,303.09 mt	IP	4,274.12 mt
	TOTAL	6,954.31 mt	MB	1.00 mt
Notes: Despite adding the MB Module in the Scope of Certification, West Palm Oil Mill still only processes FFBs from its owned supply base (West Estate) and other SDP owned plantations/estates that are certified against the RSPO P&C. In line with this operational framework, any RSPO Identity Preserved (IP) Certified Sustainable Palm Oil (CSPO) or RSPO IP Certified Sustainable Palm Kernel (CSPK) products are only downgraded to RSPO Mass Balance (MB) CSPO or RSPO MB CSPK after being loaded into the truck tank or truck trailer for transportation to the refinery or KCP, as determined by the Global Trading Marketing (GTM) Department. 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. <ul style="list-style-type: none"> * Volume extension has been requested on 22/03/2024, after the audit. Major Non-conformities has been raised under indicator 3.8.7 reference 2463285-202402-M1 				

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Feb-23	2,857.64	664.39
2	Mar-23	2,223.23	550.51
3	Apr-23	2,016.24	436.32
4	May-23	2,415.07	571.82
5	Jun-23	2,136.58	485.74
6	Jul-23	2,921.53	640.96
7	Aug-23	2,749.85	621.42

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8	Sep-23	2,877.09	703.83
9	Oct-23	3,540.90	851.91
10	Nov-23	3,158.26	727.11
11	Dec-23	1,969.05	456.67
12	Jan-24	1,047.00	243.63
TOTAL		29,912.44	6,954.31

11. Summary of Actual Volume sold**Current License period (May'23 – Jan'24)**

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	6,055.05	0.00	0.00	14,913.29	20,968.34
PK (MT)	5,148.71	0.00	0.00	152.34	5,301.05
Credits	0.00	0.00	0.00	0.00	0.00

Previous License period (Feb'23 – Apr'23)

CPO (MT)	4,170.66	0.00	0.00	690.95	4,861.61
PK (MT)	1,651.22	0.00	0.00	0.00	1,651.22
Credits	0.00	0.00	0.00	0.00	0.00

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)

No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1.	AAA	TR-2e595302-7eb8 TR-2390dbcb-51b9 TR-76e88f7a-affd TR-b45570c1-d405 TR-44fab2f-d1c2 TR-bae21a3e-5335 TR-a85f25a9-af33 TR-ff2688d6-2a77 TR-49b12437-46b3 TR-d186865b-5d29 TR-9843a4ef-e370 TR-c3dc62e9-0816 TR-ce05faaf-b3ef TR-e142bb9d-a56b		4,599.86

		TR-da8f7587-c472 TR-da172388-be93 TR-4a1e8d49-9c75 TR-7234cf72-abca TR-4e2e258c-f5d6 TR-16d7892f-b752 TR-9f496a45-64ba TR-496be1c8-6349 TR-d257d140-c1bc		
2.	BBB	TR-2991d3a3-3486 TR-b5154525-3ba3 TR-1c4d5bee-61ed TR-7e5d0113-7ed7 TR-4aab7f85-f4e9 TR-2614a0ec-8834 TR-b0f906cf-0827 TR-ef401411-4216 TR-8c47121e-fdf3 TR-a7233a9e-3653 TR-4a038ff5-10ec TR-d996689e-2aa1 TR-8231e21f-c2bc TR-708ba41e-b835 TR-49961daa-2f5a TR-483fdbb1-0ed8 TR-9e9924af-2e57 TR-c78488f7-673b TR-c0f4bd36-a8a0 TR-76d86e1e-a7e2 TR-c5b04c7f-52a0 TR-72059b27-ceb3 TR-28c428ab-063f TR-f6d9e164-1c8c TR-1b9ec49a-ccb0 TR-4a5dcd14-af13 TR-a795011e-9d15 TR-2d9b3d96-ecca TR-639a5633-b0dd TR-0842510f-e90c TR-5456659e-fb43 TR-59d3df21-11c3	6,055.05	

		TR-ae9cd513-dbb8 TR-b1a6c653-78d9 TR-72ff3a87-42dc TR-76ef8aea-0617 TR-ba286970-20ff TR-23d90a44-feb0 TR-9a9bffb5-28c8 TR-bc91b2e8-c9ef TR-a8001690-73d1 TR-2027de21-25ed TR-fd8af2b5-fc98 TR-9f2c2ccc-a5b8 TR-17a4f0a8-40d3		
3.	CCC	TR-2ff359ff-aa2b TR-6eaef68b-1f13 TR-1ce1c47f-6319 TR-d726634e-efa3 TR-537d194c-a96d TR-f99b0f80-6b64 TR-7b33fbec-36fa TR-2da3d9e9-a461 TR-2cb061b2-b6ce TR-c5d2d713-ad10 TR-270b5986-6407 TR-8893e364-9cb7 TR-25f3e048-34a8 TR-bfe507ec-3f50 TR-77f1d19f-3af2 TR-d3098c2e-86e6		2,200.07
4.	DDD	TR-aeefdd09-a72c TR-144d4975-12a4 TR-3c38f36b-a041 TR-94c39655-cc10 TR-f6ca3e26-b231 TR-5d45cf37-e973 TR-01d42648-731d TR-24915742-a09a TR-2d18d376-b869 TR-528f5a53-82a1 TR-734e14b0-b5aa TR-a30dbe28-a7dd	4,170.66	

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		TR-1c03b38d-e2f6 TR-b2a12232-5a46 TR-699eac7a-4cc8 TR-1e91c826-ddf5 TR-56fc97d9-04e9 TR-de2e694d-94d0 TR-502bb6e3-3aaa TR-331a1944-6469 TR-fc1a9cb3-e399 TR-fd8e1d10-d68e TR-af9cb3dc-dfb2 TR-eeb2e76f-a903 TR-e0b3e9b5-c332 TR-9d439ba2-cf94 TR-4e89ad67-16bc TR-cf1f40b4-d466 TR-6007c3ce-2f8b TR-a217d41d-4b80 TR-9920cc8e-9690		
TOTAL			10,225.71	6,799.93

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

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1.	EEE	0.00	152.34
2.	FFFF	15,604.24	0.00
TOTAL		15,604.24	152.34

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

12. Independent Smallholders Certified Tonnage (MT) / Volume

	Forecast (May'23 – Apr'24)			Actual (Feb'23-Jan'24)			Forecast (May'24-Apr'24)		
Phase	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			0.00			0.00			0.00
IS-CSPO	0.00	0.00		0.00	0.00		0.00	0.00	
IS-CSPKO	0.00	0.00		0.00	0.00		0.00	0.00	
IS-CSPKE	0.00	0.00		0.00	0.00		0.00	0.00	
CSPK	0.00	0.00		0.00	0.00		0.00	0.00	

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
TOTAL						

13. Independent Smallholders Actual Sold Tonnage / Volume

	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (May'23 – Jan'24)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period (Feb'23 – Apr'23)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

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

Section 2: Assessment Process

Certification Body:

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

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

Tel +60 (3) 9212 9638; Fax +60 (3) 9212 9639

Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)

Website: www.bsigroup.com

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **26-29/02/2024**. 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 on-site assessment was conducted on **07/03/2024 and 13/05/2024**. The audit programs are included in Section 2.3.

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

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

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re- Certification)	Year 2 (ASA2-1)	Year 3 (ASA2-2)	Year 4 (ASA2-3)	Year 5 (ASA2-4)
West Palm Oil Mill	✓	✓	✓	✓	✓
West Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: February 24, 2025 – February 27, 2025

Total Number of Man-days: 10 Man-days

2.2 BSI Assessment Team

Name	Role	Competency
Mohd Razaleigh bin Mohamad (MRM)	Team Leader	<p>Education: He graduated Bachelor (Scs.) Plantations Management and Agrotechnology from Universiti Teknologi Mara (UiTM) in 2012.</p> <p>Work Experience: 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&C, MSPO, since 2017 until now.</p> <p>Training attended: He has successfully completed ISO 9001:2015 (2020), ISO 14001:2015 (2017), ISO 45001:2018 (2021), Endorsed RSPO P&C Lead Auditor Course (2018), Endorsed MSPO P&C Lead Auditor Course (2017), Social Accountability SA8000 (2019), Endorsed RSPO Independent Smallholder (IHS), (2022).</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English Language</p> <p>Aspect covered in this audit: <input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements <input checked="" 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>
Amir B Bahari (AB)	Team Member	<p>Education: He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996.</p>

		<p>Work Experience:</p> <p>He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment, he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 718 man-days todate in the auditing profession after ending career in the plantation industry.</p> <p>Training attended:</p> <p>Fundamental and auditing in ISO 9001, ISO 14001, OHSAS 18001, MSPO & also RSPO LA Assessor Course.</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <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>Language proficiency:</p> <p>He is fluent in both verbal/written in Bahasa Malaysia and English.</p>
Nor Halis Abu Zar (NHAZ)	Team Member	<p>He holds Bachelor of Science, Plantation Technology and Management, graduated from Universiti Teknologi Mara</p> <p>Work Experience:</p> <p>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 including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans.</p> <p>Training attended:</p> <p>He is a qualified Lead Auditor for MS2530:2013 and has accumulated more than 300 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia. He has completed ISO IMS 9001, 14001 Lead Auditor Course in January 2019, MSPO 2530:2013 Lead Auditor Course in February 2019 and endorsed RSPO Lead Auditor Course in October 2020</p> <p>Language proficiency:</p> <p>He is fluent in both verbal/written in Bahasa Malaysia and English</p> <p>Aspect covered in this audit:</p> <p><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>
Dr. Suhaili Sahari	Peer Reviewer	<p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in</p>

		<p>Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p> <p>Work Experience: Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1. ISO 9001:2015 Lead Auditor and Internal Auditor 2. ASI reviewer training 3. Safety and Health 4. ISO 14001:2015 Standard 5. RSPO Standards: RSPO P&C 2018 MY-NI 2019 6. MSPO Standards : MS 2530 : 2013 part 1, 2 , 3 and 4 7. Problem Solving Technique : 8 D, ICC, QCC, Systematic PS 8. HACCP MS 1480:2019 9. GAP Standard : Global GAP, Euro GAP
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Accompanying Persons:

Name	Role
Fahmi Bin Othman	Observer

2.3 Assessment Plan

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

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Date	Time	Subjects	MRM	NHAZ	AB
25/02/2024 (Sunday)		Auditor travel to Telok Panglima Garang Overnight at Telok Panglima Garang.	✓	✓	✓
26/02/2024 (Monday)	0830-0900	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). Verification on previous audit findings 	✓	✓	✓
	0900-1100	West POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc	✓	✓	✓
	1300-1400	Lunch			
	1400-1630	West POM 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 <u>Extension of scope.</u> 1) Documentation review related to supply chain e.g., procedures, work instructions, production report, mass balance records, sales contracts, shipping documents, training records, etc. 2) Interview with PalmTrace PIC (from GTM), weighbridge operators, etc. 3) Site visit – receiving, processing and dispatch	✓	✓	✓
	1630-1700	Interim closing meeting	✓	✓	✓
27/02/2024 (Tuesday)		West POM 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) (Continued)	✓	✓	✓
	1000-1200	Stakeholder consultations	✓		
	1230-1300	Interim closing meeting			
	1300-1400	Lunch			

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Date	Time	Subjects	MRM	NHAZ	AB
	1400-1700	West Estate 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)	✓	✓	✓
28/02/2024 (Wednesday)	0900-1300	West Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc	✓	✓	✓
	1300-1400	Lunch			
	1400-1630	West Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc)	✓	✓	✓
	1630-1700	Interim closing meeting	✓	✓	✓
29/02/2024 (Thursday)	0900-1200	RSPO Supply chain requirements for mill	✓	✓	
	1200-1230	Preparation for closing meeting	✓	✓	
	1230-1330	Closing meeting	✓	✓	

Major Non-conformities closure visit

Date	Time	Subjects	MRM
Thursday 07/03/2024	0830-0930	Opening Meeting: • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan	✓
	0930-1300	Verification on Major NC closure evidence. Document review, site observation, workers/stakeholder interview (individual and group session) for NCR # 2463285-202402-M2	✓

Date	Time	Subjects	MRM
	1300-1400	Closing meeting - conclusion and recommendation	✓

Date	Time	Subjects	MRM
Monday 13/05/2024	0830-0930	Opening Meeting: • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan	✓
	0930-1300	Verification on Major NC closure evidence. Document review, site observation, workers/stakeholder interview (individual and group session) for NCR # 2463285-202402-M1 and NCR # 2463285-202402-M3	✓
	1300-1400	Closing meeting - conclusion and recommendation	✓

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	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.	Complied

	<p>On 16/01/2020, 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):</p> <p>https://simedarbyplantation.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/</p>	
<p>Have all the estates and mills certified within five (5) years after obtaining RSPO membership?</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021</p>	<p>Generally, all estates and mills excepted stated below or in the TBP are certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As 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 Sime Darby Plantation Berhad have no control in the management. Refer TBP approval dated 13/07/2023.</p>	Complied
<p>Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.</p>	<p>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.</p> <p>(1) Ladang Panjang Estate: 1,796.19 Ha.</p> <p>(2) Rantau Panjang Estate, Napal Estate / Karang Ringin Estate: 1,843.73 Ha.</p> <p>(3) Mangun Jaya Estate: 1,398.55 Ha.</p> <p>(4) Sungai Jernih Estate: 851.57 Ha.</p> <p>(5) Pelanjau Estate (PT BAL) & Beturus Estate (PT BAL): 4,071.76 Ha.</p> <p>(6) Karya Palma Estate (PT SNP): 476.70 Ha.</p> <p>(7) West and East Estate: 1,452.93 Ha.</p>	Complied
<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>	Complied
<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.</p> <p>Is this consistent with the ACOP reporting?</p>	<p><u>Indonesia</u></p> <ul style="list-style-type: none"> - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. 	Complied

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	<ul style="list-style-type: none"> - PT Mitral Austral Sejahtera: The properties were sold and currently Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019. <p><u>Malaysia</u></p> <ul style="list-style-type: none"> - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate has been transferred to SOU Lavang. - Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction. <p><u>Papua New Guinea</u></p> <ul style="list-style-type: none"> - Markham Farming Company Limited (MFCL)/ Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: www.rspo.org/certification/public-announcement <p><u>Liberia</u></p> <ul style="list-style-type: none"> - As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/. <p>ACOP 2022 has been cross-referenced as below: https://rspo.org/members/1-0008-04-000-00/</p>	
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	Although there are lapses has been identified at those Indonesia management units, but it has been justified that these units are still awaiting to receive land titles.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as these 2 assets were disposed.	Complied
Un-Certified Units or Holdings		

No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units. Refer TBP approval dated 13/07/2023.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification:</p> <p>(1) NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/</p> <p>(2) NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiidary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/</p> <p>(3) NBPOL (Ramu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/</p> <p>(4) NBPOL (Ramu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/</p> <p>(5) NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/</p> <p>(6) NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/</p> <p>(7) NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/</p> <p>(8) NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/</p> <p>(9) NBPOL (J estate) 01/11/2013</p>	Complied

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	<p>– no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/</p> <p>(10) NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/</p> <p>(11) NBPOL (Ramu Agri Industries Ltd) 06/03/2012 – no comments captured in RSPO website: https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/</p> <p>(12) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/</p> <p>(13) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/</p> <p>(14) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/</p> <p>Management units for 12 – 14 above were disposed.</p>	
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as both sites was disposed.</p> <p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancies between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of August 2023, 16 out of 19 management units in Indonesia operations completed LUCA review with 1 Concept note (covering all 19 affected manage units) has been endorsed by RSPO.</p> <p>As per Internal Audit conducted in 16-25 Oct 2023, and 13-17 Nov 2023, all issues of are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C.</p>	Complied

	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.	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	<p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism.</p> <p>As per Internal Audit conducted in 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>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labour, stakeholders and communities are to be dealt using this mechanism</p>	Complied
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	<p>Sime Darby Plantation Berhad maintains corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.</p> <p>Under RSPO DSF, the latest registered complaint for SD was in 2017. No latest complaint case reported in DSF.</p>	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue is mainly waiting for Land Titles. The last audit was conducted in July 2022. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance. HCV Assessment has been conducted for all SDP operations since 2010, there has been no clearance of HCV areas after the HCV Assessment has been conducted and verified during the annual RSPO External and Internal Audit reports. The liability happened as there were no HCV Assessment done at the time of planting for the cases which were entered into the RACP process.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	Complied

Have there been any stakeholder (including NGO) consultation conducted?	Respective sites are maintaining the stakeholder engagements as part of the estates/mills' operations. Especially in Indonesia, socialization of company.	Complied
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3.2 Progress of scheme smallholders and/or outgrowers

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

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Approved Time Bound Plan

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

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

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

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

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

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										East Estate) is still in process.	
	Indonesia	East Estate	2,665.48	Certified	N/A	18-Oct-10					
	Indonesia	East Estate/Sei Mawang	1,452.93	Not Certified	2023	N/A		Yes	2024	Land legalization process for 1452.93 ha (West and East Estate) is still in process.	13-Jul-23
Sungai Dingin	Malaysia	Sungai Dingin Oil Mill	19,517.17	Certified	N/A	12-Aug-10					
	Malaysia	Anak Kulim Estate	1,523.35	Certified	N/A	12-Aug-10					
	Malaysia	Sungai Dingin Estate	4,244.03	Certified	N/A	12-Aug-10					
	Malaysia	Somme Estate	941.56	Certified	N/A	12-Aug-10					
	Malaysia	Bukit Selarong Estate	3,896.17	Certified	N/A	12-Aug-10					
	Malaysia	Padang Buluh Estate	4,008.47	Certified	N/A	12-Aug-10					
	Malaysia	Bukit Hijau Estate	2,725.00	Certified	N/A	12-Aug-10					
	Malaysia	Jentayu Estate	2,178.59	Certified	N/A	12-Aug-10					
Chersonese	Malaysia	Chersonese Oil Mill	11,099.36	Certified	N/A	5-Oct-11					
	Malaysia	Chersonese Estate	3,293.72	Certified	N/A	5-Oct-11					
	Malaysia	Kalumpang Estate	2,716.80	Certified	N/A	5-Oct-11					
	Malaysia	Tali Ayer Estate	3,756.10	Certified	N/A	5-Oct-11					
	Malaysia	Holyrood Estate	1,332.74	Certified	N/A	5-Oct-11					
Elphil	Malaysia	Elphil Oil Mill	6,814.60	Certified	N/A	18-Jun-11					
	Malaysia	Kamuning Estate	3,888.43	Certified	N/A	18-Jun-11					
	Malaysia	Elphil Estate	1,865.43	Certified	N/A	18-Jun-11					
	Malaysia	Kinta Kellas Estate	1,060.74	Certified	N/A	18-Jun-11					
Flemington	Malaysia	Flemington Oil Mill	11,226.23	Certified	N/A	5-Oct-11					
	Malaysia	Flemington Estate	1,906.84	Certified	N/A	5-Oct-11					
	Malaysia	Bagan Datoh Estate	3,781.86	Certified	N/A	5-Oct-11					
	Malaysia	Sabak Bernam Estate	2,511.79	Certified	N/A	5-Oct-11					

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	Malaysia	Sg. Samak Estate	3,025.74	Certified	N/A	5-Oct-11					
Seri Intan/ Selaba	Malaysia	Seri Intan Oil Mill	14,474.29	Certified	N/A	3-Mar-11					
	Malaysia	Selaba Oil Mill	1,549.75	Certified	N/A	3-Mar-11					
	Malaysia	Seri Intan (+ Selaba) Estate	4,013.16	Certified	N/A	3-Mar-11					
	Malaysia	Sabrang Estate	3,945.23	Certified	N/A	3-Mar-11					
	Malaysia	Sogomana Estate	2,214.08	Certified	N/A	3-Mar-11					
	Malaysia	Sg. Wangi Estate	2,226.66	Certified	N/A	3-Mar-11					
	Malaysia	Bikam Estate	2,075.16	Certified	N/A	3-Mar-11					
	Malaysia	Cluny (+ Bedford) Estate	1,549.75	Certified	N/A	3-Mar-11					
Tennamaram	Malaysia	Tennamaram Oil Mill	10,706.26	Certified	N/A	3-Mar-11					
	Malaysia	Tennamaram Estate	1,981.60	Certified	N/A	3-Mar-11					
	Malaysia	Sungai Buluh Estate	5,152.22	Certified	N/A	3-Mar-11					
	Malaysia	Bukit Talang Estate	3,572.44	Certified	N/A	3-Mar-11					
Bukit Kerayong	Malaysia	Bukit Kerayong Oil Mill	6,346.90	Certified	N/A	15-Apr-11					
	Malaysia	Bukit Kerayong Estate	2,699.28	Certified	N/A	15-Apr-11					
	Malaysia	Bukit Cheraka Estate	3,647.62	Certified	N/A	15-Apr-11					
East	Malaysia	East Oil Mill	10,902.94	Certified	N/A	19-May-10					
	Malaysia	East Estate	5,634.45	Certified	N/A	19-May-10					
	Malaysia	Sepang Estate	2,092.28	Certified	N/A	19-May-10					
	Malaysia	Dusun Durian Estate	3,176.21	Certified	N/A	19-May-10					
West	Malaysia	West Oil Mill	5,912.69	Certified	N/A	19-May-10					
	Malaysia	West Estate	5,912.69	Certified	N/A	19-May-10					

Bukit Puteri	Malaysia	Bukit Puteri Oil Mill	3,875.80	Certified	N/A	7-Jul-11					
	Malaysia	Bukit Puteri Estate	3,875.80	Certified	N/A	7-Jul-11					
Kerdau	Malaysia	Kerdau Oil Mill	13,781.50	Certified	N/A	7-Jul-11					
	Malaysia	Kerdau Estate	5,683.04	Certified	N/A	7-Jul-11					
	Malaysia	Mentakab Estate	3,266.49	Certified	N/A	7-Jul-11					
	Malaysia	Chenor Estate	2,834.98	Certified	N/A	7-Jul-11					

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	Malaysia	Sg Mai Estate	1,996.99	Certified	N/A	7-Jul-11					
Jabor	Malaysia	Jabor Oil Mill	2,332.92	Certified	N/A	7-Jul-11					
	Malaysia	Jabor Estate	2,332.92	Certified	N/A	7-Jul-11					
Labu	Malaysia	Labu Oil Mill	4,529.72	Certified	N/A	30-Dec-11					
	Malaysia	Labu Estate	4,529.72	Certified	N/A	30-Dec-11					
Tanah Merah	Malaysia	Tanah Merah Oil Mill	6,203.87	Certified	N/A	19-May-10					
	Malaysia	Tanah Merah Estate	4,341.73	Certified	N/A	19-May-10					
	Malaysia	Bukit Pelandok Estate	1,862.14	Certified	N/A	19-May-10					
Sua Betong	Malaysia	Sua Betong Oil Mill	18,457.27	Certified	N/A	18-Feb-14					
	Malaysia	Sua Betong Estate	2,870.75	Certified	N/A	18-Feb-14					

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

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

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

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	Malaysia	Tun Dr. Ismail Estate	4,271.44	Certified	N/A	11-Apr-11					
	Malaysia	Pekan Estate	3,258.70	Certified	N/A	11-Apr-11					
	Malaysia	Sembrong Estate	1,778.88	Certified	N/A	11-Apr-11					

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

	Malaysia	Sungang Estate	3,407.98	Certified	N/A	16-Jan-09					
	Malaysia	Tingayu Estate	1,881.08	Certified	N/A	16-Jan-09					
	Malaysia	Jeleta Bumi Estate	3,099.44	Certified	N/A	16-Jan-09					
Giram	Malaysia	Giram Oil Mill	8,345.02	Certified	N/A	16-Jan-09					
	Malaysia	Giram Estate	4,166.98	Certified	N/A	16-Jan-09					
	Malaysia	Mostyn Estate	4,178.04	Certified	N/A	16-Jan-09					
Merotai	Malaysia	Merotai Oil Mill	11,545.71	Certified	N/A	16-Jan-09					
	Malaysia	Merotai Estate	3,052.66	Certified	N/A	16-Jan-09					

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	Malaysia	Imam Estate	3,773.56	Certified	N/A	16-Jan-09					
	Malaysia	Tiger Estate	2,497.86	Certified	N/A	16-Jan-09					
	Malaysia	Table Estate	2,221.63	Certified	N/A	16-Jan-09					
Layang	Malaysia	Lavang Oil Mill	24,836.54	Certified	N/A	30-Dec-11					
	Malaysia	Lavang Estate	4,363.83	Certified	N/A	30-Dec-11					
	Malaysia	Rasan Estate	3,454.00	Certified	N/A	30-Dec-11					
	Malaysia	Belian Estate	2,847.00	Certified	N/A	30-Dec-11					
	Malaysia	Kelida Estate	2,460.00	Certified	N/A	30-Dec-11					
	Malaysia	Lavang (Special) Estate	included under Lavang Estate Ha	Certified	N/A	30-Dec-11					
	Malaysia	Pekaka Estate	2,626.14	Certified	N/A	30-Dec-11					
	Malaysia	Ruai Estate	2,460.96	Certified	N/A	30-Dec-11					
	Malaysia	Dulang Estate	2,548.00	Certified	N/A	30-Dec-11					
	Malaysia	Charquest Estate	1,448.71	Certified	N/A	30-Dec-11					
	Malaysia	Paroh Estate	2,627.90	Certified	N/A	30-Dec-11					
	Malaysia	Rajawali Oil Mill	14,104.45	Certified	N/A	30-Dec-11					
Rajawali	Malaysia	Rajawali Estate	6,087.27	Certified	N/A	30-Dec-11					
	Malaysia	Samudera Estate	3,308.60	Certified	N/A	30-Dec-11					
	Malaysia	Semarak Estate	2,248.68	Certified	N/A	30-Dec-11					
	Malaysia	Bayu Estate	2,459.90	Certified	N/A	30-Dec-11					
	Malaysia	Derawan Oil Mill	9,528.83	Certified	N/A	30-Dec-11					
Derawan	Malaysia	Derawan Estate	2,490.79	Certified	N/A	30-Dec-11					
	Malaysia	Sahua Estate	2,644.00	Certified	N/A	30-Dec-11					
	Malaysia	Takau Estate	2,107.00	Certified	N/A	30-Dec-11					
	Malaysia	Damai Estate	2,287.04	Certified	N/A	30-Dec-11					
	Malaysia										

Guadalcanal Plains Palm Oil Limited (GPPOL)	Solomon Islands	Tetere Oil Mill	9,025.69	Certified	N/A	18-Mar-11					
	Solomon Islands	Tetere Estate	2,947.79	Certified	N/A	18-Mar-11					
	Solomon Islands	Ngalimbiu Estate	2,498.65	Certified	N/A	18-Mar-11					

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

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

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	Papua New Guinea	Surinam Estate	2,154.14	Certified	N/A	5-Aug-10					
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	Papua New Guinea	Dumpu Estate	2,254.36	Certified	N/A	5-Aug-10					
	Papua New Guinea	Ngaru Estate	854.33	Certified	N/A	5-Aug-10					
	Papua New Guinea	J Estate (Jephcott) Estate	2,824.01	Certified	N/A	5-Aug-10					
	Papua New Guinea	Smallholders - Madang VOPs (71)	360.00	Certified	N/A	5-Aug-10					
	Papua New Guinea	Smallholders - Morobe VOPs (253)	283.70	Certified	N/A	5-Aug-10					
Higaturu Oil Palm (HOP)	Papua New Guinea	Sangara Oil Mill		Certified	N/A	1-Feb-13					
	Papua New Guinea	Mamba Oil Mill		Certified	N/A	1-Feb-13					
	Papua New Guinea	Embi Estate	1,737.78	Certified	N/A	1-Feb-13					
	Papua New Guinea	Ambogo Estate	2,040.00	Certified	N/A	1-Feb-13					
	Papua New Guinea	Sangara Estate	1,780.00	Certified	N/A	1-Feb-13					
	Papua New Guinea	Sumbiripa Estate	2,545.00	Certified	N/A	1-Feb-13					
	Papua New Guinea	Mamba Estate	4,013.10	Certified	N/A	1-Feb-13					
	Papua New Guinea	Sambogo Estate	2,637.85	Certified	N/A	1-Feb-13					
	Papua New Guinea	Scheme Smallholder Sorovi Division (2019)	3,940.21	Certified	N/A	1-Feb-13					
	Papua New Guinea	Scheme Smallholder Saiho Division (842)	1,493.06	Certified	N/A	1-Feb-13					
	Papua New Guinea	Scheme Smallholder Aeka Division (911)	1,474.23	Certified	N/A	1-Feb-13					

	Papua New Guinea	Scheme Smallholder Igora Division (1367)	2,940.15	Certified	N/A	1-Feb-13					
	Papua New Guinea	Scheme Smallholder Ilimo Division (671)	1,063.66	Certified	N/A	1-Feb-13					
West New Britain (WNB)	Papua New Guinea	Mosa Oil Mill		Certified	N/A	10-Sep-08					
	Papua New Guinea	Kumbango Oil Mill		Certified	N/A	10-Sep-08					
	Papua New Guinea	Kapiura Mill		Certified	N/A	10-Sep-08					
	Papua New Guinea	Numundo Mill		Certified	N/A	10-Sep-08					
	Papua New Guinea	Waraston Mill		Certified	N/A	10-Sep-08					
	Papua New Guinea	Bebere Estate	2,226.71	Certified	N/A	10-Sep-08					
	Papua New Guinea	Kumbango Estate	2,610.80	Certified	N/A	10-Sep-08					
	Papua New Guinea	Togulo Estate	1,509.20	Certified	N/A	10-Sep-08					

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	Papua New Guinea	Dami Estate	1,507.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Waisisi Estate	1,090.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Kautu Estate	4,280.60	Certified	N/A	10-Sep-08					
	Papua New Guinea	Karassu Estate	2,387.64	Certified	N/A	10-Sep-08					
	Papua New Guinea	Moroa Estate	848.16	Certified	N/A	10-Sep-08					
	Papua New Guinea	Bilomi Estate	2,011.70	Certified	N/A	10-Sep-08					

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

	Papua New Guinea	Smallholders VOP West (1279)	2,804.10	Certified	N/A	10-Sep-08					
	Papua New Guinea	Smallholders LSS Kapiura (551)	551.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Smallholders VOP Kapiura (850)	847.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Smallholders Kaulong/Akami/Pushiki/Repamira/Sakapei (20)	700.37	Certified	N/A	10-Sep-08					

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Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Papua New Guinea	Erap Mill	5,399.40	Certified	N/A	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.	
	Papua New Guinea	Munum Estate	1,734.57	Certified	N/A	27-Mar-20					
	Papua New Guinea	Maralumi Estate	2,427.15	Certified	N/A	27-Mar-20					
	Papua New Guinea	Erap Estate	1,237.68	Certified	N/A	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 3 (Three) Critical; 2 (Two) Minor nonconformities and 1 (One) Opportunity For Improvement raised. The *SOU 09- West Palm Oil Mill* Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment (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			
NCR Ref #	2463285-202402-M1	Issued Date	27/02/2024
Due Date	27/05/2024	Closure Date	13/05/2024
Indicator & Category (Critical / Minor)	3.8.7 (Critical)		
Statement of Nonconformity:	The mill did not inform the CB on overproduction of certified FFB		
Requirement Reference:	ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.		
Objective Evidence:	Based on verification of Pre-Audit Info 2024, Palm Trace and Mass Balance Sheet Record of West POM, it was found that there is overproduction of certified tonnage compared to Estimated FFB, CPO and PK based on 12 month running data. Data as below:		
		FFB, MT	CPO, MT
	Estimate (Mar 23-Apr 24)	123,966.69	24,585.95
	Production (Jan 23-Dec 23)	149,636.78	29,914.32
	Variance	-25,670.09	-5,328.37
Based on Palm Trace, there is no additional volume data resulting from CB was not informed on overproduction of certified tonnage.			
Corrections:	<ol style="list-style-type: none"> To brief the PIC on monitoring of the actual production of FFB, CPO and PK volume against forecasted certified volume declared by the mill to CB in the pre-audit information by 18 March 2024. Request for volume extension for over production of FFB, CPO and PK by 18 March 2024. 		

Root Cause Analysis:	There is oversight from the assigned personnel to monitor and take action.
Corrective Actions:	<ol style="list-style-type: none"> 1. Mill PIC to monitor actual production quarterly, and every month during the last quarter, to ensure that the production does not exceed the forecasted volume reported at any time. 2. All internal audits will raise as observation on this matter for mill to follow up closely towards the end of license period. 3. Alert by SCU, Group Sustainability to all mills to remind mills to notify CB in case of overproduction
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Training has been conducted to PIC on 15/03/2024 by Mr Hafiz Aiman Abdul Rahman title "Briefing on monitoring production of FFB, CPO & PK volume against forecast volume" and " Training on procedure of amendment of FFB, CPO & PK volume forecast" attended by 3 PIC. . Training evaluation has been conducted after the training and sighted in the document "Borang Penilaian Sistem Pensijilan Rantaian Bekalan" for all 3 PIC. 2. Request extension has been submitted to CBs on 19/03/2024, FFB total 28,202.79, CSPO, 6,453.77mt, and CSPK 1,251mt 3. Interview with the PIC confirmed that they can demonstrate their understanding on the procedure and volumen extension request. 4. Verification through RSPO palm trace and FFB, CSPO and CSPO production records confirmed that there is no overproduction has been identified. <p>The evidence provided has been verified and sufficient to close the Major- Non-conformities.</p>

Non-conformity			
NCR Ref #	2463285-202402-M2	Issued Date	27/02/2024
Due Date	27/05/2024	Closure Date	07/03/2024
Indicator & Category (Critical / Minor)	2.1.1 (Critical)		
Statement of Nonconformity:	Drainage at the workers housing has not been maintained as per legal requirement		
Requirement Reference:	The Unit of Certification complies with legal requirements		
Objective Evidence:	<ol style="list-style-type: none"> 1. Line site inspection has been done weekly basis by the management for both operating units and there is no issues has been highlighted on housing drains 2. As per internal audit conducted 04/10/2023 highlighted that the drain has been fill up with garden waste/domestic waste and the issues has been closed on 04/11/2023 and evidence has been provided by the management. 3. However, during the site visit to block G, Bangkong Division, West Estate and Block J, West POM found out that the actual condition is 		

	<p>contradicted with statement mentioned in the line site inspection and internal audit closure.</p> <p>4. Further interview has been done with visiting medical officer (VMO), she mentioned that she are not aware with the condition and give full responsibilities for line site inspection to the medical assistant.</p> <p>This is against the requirement in the Section 23 (1)(b) It shall be the duty of the employer of a place of employment where employees and their dependents are provided with housing accommodation to ensure that— the perimeter drains around each dwelling or block of dwellings including all outlet drains are kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water.</p>
Corrections:	<ol style="list-style-type: none"> 1. The OU Manager and the PIOA (HA/MA) will do full inspection within three days to identify the areas that need immediate cleaning and repair. A plan will be developed to address the findings based on criticality. 2. To brief the PIOA (HA/MA), VMO and EWC on the requirement related to weekly inspection as per SOP, requirement under Act 446 and checklist. 3. To immediately revert the form currently used from typed/digital form to physical form (filled in physically/manually). 4. Refresher briefing to workers on utilizing OPP reporting and understanding to ensure complaints related to Housing (drainage condition) is promptly addressed to.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. The implementation as stated in last year <u>RSPO Corrective Action Plan</u> was not conducted effectively because there was no follow up and cross check of the findings in the weekly inspection report by the management. 2. The current way of recording the finding (type in the office after the inspection) is not reflecting the actual condition as the PIC could missed some of the issues that need to be addressed. 3. As per Workers Housing Management Procedure 2021, Page 10, VMO is responsible to conduct inspection and assessment of workers housing complex and amenities together with PIOA (HA/MA) however their roles were not executed effectively.
Corrective Actions:	<ol style="list-style-type: none"> 1. EWC to review if assigning just one MA to inspect the entire estate once a week is practical. 2. Establishing inspection roster /schedule for the identified PIOA (HA/MA) to ensure the task given is manageable. 3. To regularly enforce the condition set in the house rules, OPP reporting and conduct gotong –royong activity to inculcate the awareness among the workers, by updating OUs' Social Management Plans. 4. The findings from the inspection are translated into plan to address and categorize outcome/issue identified based on criticality and urgency, and for discussion in EWC meetings.
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Full inspection has been conducted by both operating units on 04/03/2023 for West POM and on 05/03/2023 and 06/03/2023 for West

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	<p>Estate and the report of inspection sighted in the document " Line site inspection plan for cleaning and repairs for areas identified that needs urgent attention from immediate inspection of all areas any evidence of cleaning."</p> <ol style="list-style-type: none"> Briefing has been conducted to medical assistant, PIOA on 02/03/2024 which has been conducted for both POM and Estate and there is evidence that all PIC attended the training. Additional briefing sighted on 05/03/2024. Briefing to VMO done on 05/03/2023 which is Dr Hartati Suhaimi. Refresher training for submitting complaint related to housing conducted to all workers. For West Estate, training conducted on 05/03/2023 and 02/03/2024. While for West POM, training conducted on 04/03/2023 for shift A workers, general workers, workshop. For shift B planned to be conducted on 11/03/2024. Evidence of line site inspection that has fill in physically instead of type/digital form which latest conducted on 05/03/2024 and 06/03/2024. Estate/POM has reviewed any requirement for additional MA/HA. The management decided to add additional PIOA and has been verified based on organization chart and appointment letter. Inspection roaster/schedule has been established and sighted in the document "Carta Gant Program EWC KKS West FY 2024" for West POM and "Jadual Pemeriksaan Perumahan Pekerja Ladang West" for West Estate. Social management plan has been updated which to include issues related to drainage maintenance, gotong royong, EWC meeting, rubbish collection etc. <p>The evidence provided has been verified and sufficient to close the Major- Non-conformities.</p>
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Non-conformity			
NCR Ref #	2463285-202402-M3	Issued Date	27/02/2024
Due Date	27/05/2024	Closure Date	13/05/2024
Indicator & Category (Critical / Minor)	3.6.1 (Critical)		
Statement of Nonconformity:	Mitigation plans and procedures related chemical handling in CHRA was not fully implemented.		
Requirement Reference:	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<ol style="list-style-type: none"> Site visit at West Estate General Store Div 4, it was found petrol and used lubricant was stored in the containers without any labelled. Site visit at West POM, Guard Post of Workshop, it was found that petrol was stored in the containers without any labelled. 		

	<p>It was not in line with CHRA Report dated 11/11/2020 Section 8.1 Further Actions to control risks, 8.3 Labeling and relabeling "Under USECHH Regulation 2000: When a chemical hazardous to health is transferred into other container, other than that in which it was usually supplied, and the contents of that containers wre used within a normal work shift, the employer shall ensure that the container is relabeled with the chemical name as per the original label"</p> <p>3. Site visit at West Estate General Store Div 4, it was found chemicals Hydrochloric Acid, Glyphosate, Impact 75 and Lubricant 2T were placed there without SDS.</p> <p>It was not in line with CHRA Report dated 11/11/2020 Section 8.0 Recommendation "To ensure hardcopy of SDS available and at conspicuous are for reference at site".</p>
Corrections:	<ol style="list-style-type: none"> 1. To remove all the chemicals and lubricants from the General store at Division 4 and place in the chemical store. 2. To provide SDS for every chemical used and store and proceed to label the found containers without label as per USECHH Regulation 2000 and per Chemical Safety Procedure Management Procedure 2021 and Safe Handling & Storage of Petrol at Employees' Housing Procedure 2023. 3. Conduct thorough workplace inspection by OSH committee and PICs to identify any stores with chemical contained in containers. 4. To remove /separate all the containers containing chemicals without proper labelling and placement of the chemical in chemical store with SDS, then to proceed with labelling of the containers. 5. Refresher briefing to all workers on the prohibition of storing petrol and lubricant without label as per USECHH Regulation, 2000 and SOP. 6. Management to inform workers to get the container and stickers for labelling of the petrol container as per Safe Handling & Storage of Petrol at Employees' Housing Procedure 2023 from Estate & Mill Management Office.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. The management does not provide designated place as stated in the Safe Handling & Storage of Petrol at Employees' Housing Procedure 2023 at Division 4 where worker can safekeep petrol their bought for personal use. 2. PIOA, EWC and OSH Committee did not conduct thorough inspection at the workplace.
Corrective Actions:	<ol style="list-style-type: none"> 1. Briefing to Supervisors and mandores on the requirement to ensure hardcopy of SDS available and at conspicuous are for reference at site as per CHRA. 2. To place notice for prohibition to store chemical and petrol at AP Post, General store, and any area other than the designated chemical storage area. 3. Conduct quarterly training with training evaluation to all workers, supervisors, and mandores by using 10 Golden Rules Toolbox Talk

Assessment Conclusion:	<p>West POM</p> <ol style="list-style-type: none"> 1. Workplace inspection has been conducted in every 3 months which latest inspection has been conducted on 21/04/2024 and updated workplace inspection has been issued on 24/04/2024 in the document "Senarai Semak SDP WPI" 2. Petrol in the unlabeled container has been removed and confirmed through the site visit by the auditor. 3. Training to all workers conducted 11/03/2024 related to 10 golden rules toolbox talk by Mr Hafiz Aiman Abdul Rahman and for AP's conducted on 28/02/2024. Training evaluation has been done for 8 AP's and sighted that they can demonstrate their understanding on the training conducted 4. Discussion on the issues during the OSH committee meeting done on 04/03/2024 attended by management and workers representative. <p>West Estate</p> <ol style="list-style-type: none"> 1. Workplace inspection conducted on 21/03/2024 and included the chemical store and general store. 2. Training has been conducted on 29/02/2024 to all the workers. Training evaluation has been conducted on 11/05/2024 3. OSH meeting has discussed all the issues 22/03/2024 <p>The evidence provided has been verified and sufficient to close the Major- Non-conformities.</p>
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Non-conformity			
NCR Ref #	2463285-202402-N1	Issued Date	27/02/2024
Due Date	Next ASA	Closure Date	Open
Indicator & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	Proper disposal of waste is not demonstrated		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	A site visit to West Estate field no P18C sighted thrash being dumped at a workers' resting area. This includes waste of aged empty plastic bottles, drinks and food packets. In addition, there were also sign of spot burning observed at the site.		
Corrections:	<ol style="list-style-type: none"> 1. To place signage "Dilarang Membuang Sampah" and 'Dilarang Membakar' at every resting area. 2. Clear all the waste dumped at the resting area. 		
Root Cause Analysis:	Current communication and control on monitoring is ineffective and require further and alternate approaches need to be strengthened.		

Corrective Actions:	<ol style="list-style-type: none"> 1. To conduct briefing to workers including contractor's workers and training to the PIC for on waste management and the implementation. 2. Estate management must discuss on waste management related compliance and issues in the OSH meeting or any other specific meeting to ensure focus is given on this area.
Assessment Conclusion:	CAP has been accepted. Evidence of CAP effectiveness to be verified during next assessment.

Non-conformity			
NCR Ref #	2463285-202402-N2	Issued Date	27/02/2024
Due Date	Next ASA	Closure Date	Open
Indicator & Category (Critical / Minor)	6.7.2(Minor)		
Statement of Nonconformity:	Monitoring of 1 st aid box has not been done effectively.		
Requirement Reference:	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		
Objective Evidence:	<p>Inspection of First Aid Box at West POM (Laboratory) It was found 2 items Non Woven Wound Dressing was expired on 12/11/2023. Monthly inspection has been conducted by MA as per verification records.</p> <p>It was not in line with First Aid in Workplace Procedure 2021 Section 7.3.3 "It is essential that first aid boxes be checked frequently so as to make sure they are fully equipped, no expired product and all items are usable. Material used should be replaced as soon as possible".</p>		
Corrections:	Immediate action taken to replace the First Aid Box and the items which have expired or nearing expiration.		
Root Cause Analysis:	The MA did not check the first aid box as required due to resources constraint and as per First-aid In Workplace Procedure 2021, mill to responsible to appoint own PIC for first aid kit and ensure appropriate training, instruction and information are provided to the personnel.		
Corrective Actions:	<ol style="list-style-type: none"> 1. Mill Management to appoint QA as the person responsible for first aid kit. 2. RSQM to brief the QA and Mill Management on the scope and responsibility as stated in the First aid In Workplace Procedure 2021. 		
Assessment Conclusion:	CAP has been accepted. Evidence of CAP effectiveness to be verified during next assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>4.2.1 Investigation of any complaint/grievance received can be further improved by ensuring independent investigation implement.</p> <ol style="list-style-type: none"> 1. Complaint received through "Suara Kami" channel on 05/07/2023 from one worker that he has been terminated without any proper justification. 2. Workers went back to origin countries on 05/03/2023 and has been approved for extension of leave until June 2023. However, the worker went back to West Estate in July 2023 after the management has reported as abscond cases. 3. Before the worker leave his hometown, he met the VMO for medical checkup and the identified that he suffers for chronic pharyngitis. (Upper respiratory infection). This has been confirmed by auditor base on the outpatient report and interview with VMO. 4. The worker also has provided medical report from Iqra Hospital and Diagnostic Centre date 29/04/2023 which also mentioned that the worker suffers on Chronic Pharyngitis <p>The Regional Human Resources Department investigated the complaint; it can be further improved to consider the health report of the workers.</p>

Positive Findings	
PF #	Description
PF 1	Good commitment and corporation from the management.
PF 1	Generally well implementation of Good Agricultural Practices (GAP).

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2300343-202301-M1	Issued Date	20/01/2023
Due Date	19/04/2023	Closure Date	29/03/2023
Indicator & Category (Critical / Minor)	2.1.1 (Major)		
Statement of Nonconformity:	Compliance with legal requirements was not effectively demonstrated.		
Requirement Reference:	<p>The Unit of Certification complies with legal requirements</p> <p>Regulation reference:</p> <p>i) USECHH Regulation 2000, Regulation 17 - LEV inspection by IHT</p> <p>ii) USECHH Regulation 2000, Regulation 28 - Medical removal protection (MRP)</p>		
Objective Evidence:	i) LEV monitoring was last carried out on 19/11/2021 by registered IHT. No evidence of LEV inspection by registered IHT within the last 12 months from last inspection.		

	<p>ii) Medical surveillance was carried out in September 2022 for laboratory operators and the follow up check and retest done in December 2022. 1 of the operator, ID 701220105050 found to be unfit and OHD recommended MRP for the said worker even after retest in December 2022. MRP has initiated and she still work in the laboratory with different job scope as lab sampler. Interview with the operator has confirmed that she still continue work as laboratory operator and yet to be transferred as of January 2023.</p> <p>Site visit at West Estate – Air Hitam Division workers quarters found that the drainage system is clogged, with water is stagnant due to raining and rubbish is found in the drain. Verification also found that the main drain is full of water spinach which blocking the water from flowing. This is against the requirement in the Section 23 (1)(b) It shall be the duty of the employer of a place of employment where employees and their dependants are provided with housing accommodation to ensure that— the perimeter drains around each dwelling or block of dwellings including all outlet drains are kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water.</p>
Corrections:	<p>i. Mill has already appointed IHT registered contractor to conduct the assessment. PO for LEV inspection was issued and inspection will be held on 1st week of February 2023. The PO no. is 4300612722. The date was reschedule to 14 Feb 2023 due to unavailability of contractor to commit on 1st week of February.</p> <p>ii. Mill management immediately transfer the worker with ID 701220105050 to other department in Mill Office as Cleaner and will not involve in chemical handling.</p> <p>iii. Estate management has already taken immediate action by carrying out de-grassing activity to clean up the clogged drain.</p> <p>To engage and brief the shopkeeper on the requirement on selling of control item inside estate premises. To monitor the status of application and pending license, the operator is not allowed to store or sell LPG.</p>
Root Cause Analysis:	<p>i. The root cause is the change of person in charge (PIC) as previous QA was transferred to CWR as SSSO on 31 December 2021. New QA was appointed on 17 October 2022 and still in the learning process of his job responsibilities, which includes monitoring on LEV.</p> <p>ii. Mill management misinterpreted the findings on actions need to be taken by management.</p> <p>iii. Drainage system was clogged with rubbish & water was stagnant at Air Hitam Division workers' quarters due to rainy season and lack of monitoring by Management and awareness to workers.</p> <p>The requirements were not checked by OU Management during their inspections and not briefed to the shop operator.</p>
Corrective Actions:	<p>i. Mill Management has established annual schedule for equipment calibration and PIC for each equipment and monitoring to prevent overlook on the legal requirement of the operation in the future. Auto email notification has been made to notify the due date for LEV calibration.</p> <p>ii. Mill management will consult Chief Medical Officer in future on the findings and actions guided based on the recommendations by the report and CMO. Additionally all these reports will be discussed in the OSH meeting to ensure the committee is responsible and accountable for the actions required to address the findings.</p>

	<p>iii. West Estate will educate the workers to keep the drain clean from time to time. This action will also be part of Workers Housing Weekly Inspection for monitoring purposes. Management will also enforce the practice of good sanitation at workers quarters and install signage at drain area.</p> <p>Estate will advise the shopkeeper to proceed with their document submission to KPDNHEP as the previous application was halted due to pandemic.</p>
Assessment Conclusion:	<p>Major NC Close Out verification. Sighted and reviewed the evidence as follows:</p> <p>i. LEV Monitoring:</p> <p>a. The mill has appointed Alam Hijau Integrasi (M) Sdn. Bhd. to conduct the annual LEV monitoring. Reviewed the Purchase Order no. 43006122722 dated 07/01/2023. b. The LEV monitoring was conducted on 14/02/2023 by Hygiene Technician with DOSH Reg. no. HQ/20/JHII/00/00032. Reviewed the Executive Summary for the monitoring conducted and the results was the Engineering Control Equipment system is currently in good condition and effective for both system. The full report has yet to be received by the mill.</p> <p>b. The mill has appointed Person In-Charge to monitor the renewal and calibration for equipment in the mill as per appointment letter dated 25/01/2023 signed by the Mill Manager.</p> <p>c. The mill has established annual Schedule of Calibration and Renew of License_KKS West 2023. In the schedule, stated the Equipment/ License, due date for renewal/ calibration, Person In-Charge and proposal date for documentation.</p> <p>d. The mill will notify on the renewal to the Person In-Charge through Microsoft Outlook email Calendar application.</p> <p>ii. Medical Surveillance:</p> <p>a. The mill has changed the effected workers, ID no. 701220105050 from Laboratory Department to Day-gang Department as office helper as per letter dated 20/01/2023 signed by the Mill Manager and acknowledge by the workers on 20/01/2023.</p> <p>b. As per letter by OHD, dated 07/12/2022, the workers were required to be undergo repeat test after 3 months after the changed of jobs. The workers was send for retest on 24/03/2023. Reviewed the letter from the mill sending the workers for retest dated 25/03/2023 and confirmation letter by the OHD with reg. no. HQ/08/DOC/00/709 dated 27/03/2023.</p> <p>c. HSE - Upstream Malaysia Medical Team has visited the mill on 08/03/2023. The issue regarding the workers were discussed during the visit. Reviewed the slide show for closing meeting of the visit.</p> <p>d. The mill has discussed the issue on the medical surveillance report during OSH meeting. Reviewed minutes meeting conducted on 14/03/2023.</p> <p>iii. Clogged drain:</p> <p>a. The estate has conducted de-grassing/ removing of water spinach on 19/01/2023. Sighted during site visit, the drain was clear and the water flow swiftly. No rubbish were found in the drain. The condition were consistent with housing inspection reports dated 21/03/2023</p> <p>b. The estate has conducted training to the workers on housing drain upkeep and prohibition of disposing domestic waste in the drainage system. Reviewed the training records dated 19/01/2023, 03/03/2023 and 07/03/2023.</p>

	<p>c. The estate has erected signage on prohibition of disposing domestic waste in the drainage system as sighted during site visit. d. The estate conducted housing inspection on weekly basis. Reviewed the inspection records dated 14/03/2023 and 21/03/2023. Sighted during site visit, the condition of the were consistent with the reports.</p> <p>iv. LPG Gas Permit:</p> <p>a. The estate has conducted briefing to all the sundry shops and canteen on the compliance to the Laws and Other Regulations on 08/02/2023. reviewed the briefing material and attendance list.</p> <p>b. The estate has issue letter to the sundry shops and canteen operator to cease the selling of LPG operation and stored LPG within the permit approval as per letter dated 08/02/2023 signed by the Estate Manager.</p> <p>c. The estate has established scheduled to conduct inspection to sundry shops and canteen on monthly basis. The Person In-Charge has conducted the inspection as per scheduled. Reviewed the inspection records for the month of January, February and March 2023.</p> <p>d. The sundry shops has made application for Scheduled Control Items permit for LPG through BLESS on 02/02/2023 and approved by KPDNHEP on 10/03/2023. Refer submission no. BL22023004005 and Agency Reference no. SL/SP/005/23/GR.</p> <p>The evidences found adequate to addressed the Major Non-Conformity. Thus, the major NC were effectively closed on 27/03/2023.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>The following was verified during the audit;</p> <p>LEV (Local Exhaust Ventilation) Monitoring:</p> <p>a) The mill has appointed Alam Hijau Integrasi (M) Sdn. Bhd for the annual LEV monitoring. The LEV monitoring was conducted on 14/02/2023 by Hygiene Technician with DOSH Reg. no. HQ/20/JHII/00/00032. The latest being on 29/04/2024 Reviewed the Executive Summary for the monitoring conducted and the results concluded that the Engineering Control Equipment system is currently in good condition and functional for both systems. Both reports were sighted and verified.</p> <p>b) The mill has appointed respective PIC (Person In-Charge) to monitor the renewal and calibration for equipment in the mill as per appointment letter dated 25/01/2023 signed by the Mill Manager. Among others appointee includes Senior Assistant, Assist Managers, AAO and QA.</p> <p>c) The mill has established annual Schedule of Calibration and Renewal of License West POM 2023 and 2024. In the schedule prepared dated 03/01/2024 stated the Equipment/ License, due date for renewal/ calibration, Person In-Charge and proposed date for documentation.</p> <p>d) The mill will notify on the renewal to the Person In-Charge through Microsoft Outlook email Calendar application.</p> <p>Medical Surveillance:</p> <p>a) The mill has changed the effected workers, ID no. 701220105050 from Laboratory Department to Day-gang Department as office helper as per letter dated 20/01/2023 signed by the Mill Manager and acknowledged by the workers on 20/01/2023.</p>

	<p>b) As per letter by OHD, dated 07/12/2023, the workers were required to be undergo repeat test after 3 months after the changed of jobs. The workers were sent for retest on 24/03/2023. Reviewed the letter from the mill sending the workers for retest dated 25/03/2023 and confirmation letter by the OHD with reg. no. HQ/08/DOC/00/709 dated 27/03/2023.</p> <p>c) HSE – Upstream Malaysia Medical Team has visited the mill on 08/03/2023. The issue regarding the workers were discussed during the visit. Reviewed the slide show for closing meeting of the visit.</p> <p>d) The mill has discussed the issue on the medical surveillance report during OSH meeting agenda 3.3 (Medical Removal Protection) during the OSH meeting dated 14/03/2023 as suggested by the Chief Medical Officer of SDP.</p> <p>Perimeter drain</p> <p>a) Line site inspection has been done weekly basis by the management for both operating units and there is no issues has been highlighted on housing drains</p> <p>b) As per internal audit conducted 04/10/2023 highlighted that the drain has been fill up with garden waste/domestic waste and the issues has been closed on 04/11/2023 and evidence has been provided by the management.</p> <p>c) However, during the site visit to block G, Bangkong Division, West Estate and Block J, West POM found out that the actual condition is As per internal audit conducted 04/10/2023 highlighted that the drain has been fill up with garden waste/domestic waste and the issues has been closed on 04/11/2023 and evidence has been provided by the management.</p> <p>d) However, during the site visit to block G, Bangkong Division, West Estate and Block J, West POM found out that the actual condition is</p> <p>Repeated Major Non-conformities has been identified in same indicator. Referred to RSPO certification system 2020 clause 5.9.4 (a) Recurring major NC on the same indicator (including the supply chain indicators) in successive audits shall lead to immediate suspension of the certificate. This suspension shall be lifted when the NC is successfully addressed. Suspension has been done on 06/03/2024 and has been lift up on 07/03/2024</p>
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Previous Audit Minor Non-conformity			
NCR Ref #	2300343-202301-N1	Issued Date	20/01/2023
Due Date	Next audit (ASA2-4)	Closure Date	Open
Indicator & Category (Critical / Minor)	7.3.1 (Minor)		
Statement of Nonconformity:	The waste management plan related to Scheduled Waste was insufficiently documented.		

Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.
Objective Evidence:	West Estate: Based on the waste management plan established, the management of Scheduled Waste as per EQ (SW) 2005 Regulations requirements was insufficiently documented mainly on the documentation of 5th Schedule i.e. Inventory. Other records of disposal through Kubota Malaysia indicated Scheduled Waste being generated and disposed but no inventory maintained.
Corrections:	Estate Management has successfully completed E-SWIS registration on 30/01/2023 and has started to enter details into the system as per requirement.
Root Cause Analysis:	Estate Management has no dedicated person in-charge (PIC) since previous assistant was transferred and is currently having problem with E-SWIS registration system.
Corrective Actions:	i. Estate Management has assigned Store Keeper and an Assistant to update the E-SWIS system on monthly basis Training to PIC on scheduled waste management plan and E-SWIS system is scheduled on 14/2/2023
Assessment Conclusion:	The following was verified during the audit; a) The Estate Management has successfully completed E-SWIS registration on 30/01/2023 and has started to enter details into the system as per requirement. File reference no 11/123/000/055 5 th schedule regulation11 for inventory of Dec 2023 was verified. In addition, there was also manual updating being maintained by the estate. Record titled scheduled waste inventory for 2023 and 2024 was sighted and verified. b) Estate Management has assigned Store Keeper and an Assistant Manager to update the E-SWIS system on monthly basis. Details of appointment as follows; i. Letter dated 30/01/2023 appointing Cik Nurliyana Yatim – Assistant Manager as PIC for scheduled waste management ii. Letter dated 30/01/2023 appointing Cik Nurqiu Amira Abd Hamid – Store Clerk as PIC for scheduled waste management c) Training to PIC on scheduled waste management plan and E-SWIS system is scheduled on 14/2/2023 and 15/01/2024 was verified. As such the NCR raised is closed and concluded.

Previous Audit Minor Non-conformity			
NCR Ref #	2300343-202301-N2	Issued Date	20/01/2023
Due Date	Next audit (ASA2-4)	Closure Date	Open
Indicator & Category (Critical / Minor)	3.3.3 (Minor)		
Statement of Nonconformity:	Monitoring records and action taken was not effectively maintained.		
Requirement Reference:	Records of monitoring and any actions taken are maintained and available.		

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Objective Evidence:	E-Sime + System used as pre-start check and to report unsafe act/condition at workplace. During the mill visit/inspection, OHS non compliances were observed at fruit handling area, clarification, boiler and kernel plant. Further check in E-Sime+System, no pre-start check records for the visited workstation on 19/1/2023.
Corrections:	Immediate refresher briefing to operator on Pre-start checklist reporting before mill operation starts. Supervisors were instructed to follow up the online reporting by each station.
Root Cause Analysis:	e-Sime+ system for Pre-start checklist is a new system that utilises online medium. There are several causes of the issue, which are: i. Due to 2 weeks of mill shutdown previously, there are tendencies of operator to not paying attention to the check list Lack of reminder and follow-ups on the checklist from Supervisor.
Corrective Actions:	i. Briefing on weekly basis to operator on Pre-Start Checklist. Daily update from stations Supervisors on the completed/ filled checklist.
Assessment Conclusion:	Pre-Start Checklist and station checklist briefing has been given on weekly basis. The system was implemented on daily basis and report has been submitted through What App Mill. Refer system Prestart Checklist West Oil Mill dated 26/02/2024 and 27/02/2024. Input will be key in by supervisor and submit to the Mill Executive. The implementation of the corrective action was satisfactory thus Minor NC was effectively closed on 29/02/2024.

Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	OFI Statement: Not applicable Verification / Follow-up actions:

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1895185-202002-M1	Critical	4.2.1	23/6/2020	Closed out on 11/8/2020
1895185-202002-M2	Critical	6.2.3	23/6/2020	Closed out on 11/8/2020
1895185-202002-M3	Critical	7.10.1	23/6/2020	Closed out on 11/8/2020
1895185-202002-M4	Critical	5.3.2	23/6/2020	Closed out on 11/8/2020
1895185-202002-M5	Critical	6.7.3	23/6/2020	Closed out on 11/8/2020
1895185-202002-M6	Critical	3.6.1	23/6/2020	Closed out on 11/8/2020
1895185-202002-N1	Minor	4.2.3	23/6/2020	Closed out on 11/2/2022
1895185-202002-N2	Minor	6.2.4	23/6/2020	Closed out on 11/2/2022

1895185-202002-N3	Minor	4.2.2	23/6/2020	Closed out on 11/2/2022
1895185-202002-N4	Minor	3.3.3	23/6/2020	Closed out on 11/2/2022
2027103-202103-M1	Critical	2.1.1	01/03/2021	Closed out on 05/05/2021
2163206-202202-M1	Critical	3.4.3	11/2/2022	Closed out on 10/05/2022
2163206-202202-M2	Critical	7.8.2	11/2/2022	Closed out on 10/05/2022
2163206-202202-M3	Critical	3.6.2	11/2/2022	Closed out on 10/05/2022
2163206-202202-N1	Minor	7.3.2	11/2/2022	Closed out on 17/01/2023
2163206-202202-N2	Minor	2.2.2	11/2/2022	Closed out on 17/01/2023
2300343-202301-M1	Critical	2.1.1	20/01/2023	Closed out on 29/03/2023
2300343-202301-N1	Minor	7.3.1	20/01/2023	Closed out on 27/02/2024
2300343-202301-N2	Minor	3.3.3	20/01/2023	Closed out on 27/02/2024
2463285-202402-M1	Critical	3.8.7	27/02/2024	Closed out on 13/05/2024
2463285-202402-M2	Critical	2.1.1	27/02/2024	Closed out on 07/03/2024
2463285-202402-M3	Critical	3.6.1	27/02/2024	Closed out on 13/05/2024
2463285-202402-N1	Minor	7.3.2	27/02/2024	Open
2463285-202402-N2	Minor	6.7.2	27/02/2024	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 09- West Palm Mill* Certification Unit's environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Government agencies	Sekolah Menengah Kebangsaan Pulau Carey	Face to face
Local communities	Kampung Sungai Judah	Face to face

Local communities	Kampung Kepau Laut	Face to face
Contractor	Txxxx Yxxxx Exxxxx	Face to face
Contractor	Yxxx Exxxxxxx	Face to face
Contractor	Txx Axxx	Face to face
Internal	Workers representative	Face to face
Contractor	Kxxxxx Hxxxxx	Face to face
Internal	Gender Committee Representative	Face to face

Stakeholders comment	
1	<p>Feedbacks: Txxx xxxxx,Yxxxx Exxxxxxxx, xxxxxx Yxxx Exxxxx, Kxxxxx Hxxxxx (contractor) The contractors has a good relationship with the estate management. The contractor has also informed by the estate of the procedure of complaint and grievance during the stakeholder meeting and during the briefing/training session with the contractor. The contractor also mentions on the payment process which was done according in the stipulated contract agreement and award of contract was delivered in unbiased tendering process.</p> <p>Audit Team verification and response: No further verification required</p>
2	<p>Feedbacks: Sekolah Menengah Kebangsaan Pulau Carey The school have a very good relationship with the estate management. Verify with the school principal, the estate management is very responsive and easy to discuss with if there is any issue raised from his side. The school were also attended the stakeholder meeting and they were made to understand and aware of the complaint and grievance procedure of the estate. However, during the consultation, the school principal has raised concern regarding on the procedure for requesting of donation in terms of monetary or manpower</p> <p>Audit Team verification and response: As per verification, principal of Sekolah Menengah Kebangsaan Pulau Carey has been communicated on the procedure to request any contribution through online system for monetary and through consultation and communication procedure during the stakeholders. The management noted with the respond and refresher briefing will be conducted to ensure that good understanding on the process</p>
3	<p>Feedbacks: Kampung Sungai Judah Good cooperation given by estate management team. Contribution not only monetary but also manpower and machinery were given if there is any assistance required. Relationship and contribution with the estate management were consistent rather than ad-hoc. Estate under Sime Darby Plantation Berhad is known for offering job opportunity to the villager. No land encroachment from Sime Darby Plantation Berhad estates.</p> <p>Audit Team verification and response: No further verification required</p>
4	<p>Feedbacks: Workers representative They informed that there are no outstanding issues with the estate management. Regular meetings between the estate 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 management.</p> <p>Audit Team verification and response: No further verification required</p>

5	<p>Feedbacks: Local and Foreign Workers</p> <p>Regular training on company's SOP, policies, safety and health, environmental and social aspects were conducted by estate management. 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.</p> <p>Audit Team verification and response: No further verification required.</p>
6	<p>Feedback: Gender Committee Representative</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 estate management.</p> <p>Audit Team verification and response: No further verification required.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not applicable					
West POM Certification Unit have already gone through 2nd Cycle of Replanting therefore this is not applicable					

Previous land owner / user comment	
	Feedbacks:
	Audit Team verification and response:
West POM Certification Unit have already gone through 2nd Cycle of Replanting therefore this is not applicable	



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 09- West Palm Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that SOU 09- West Palm Oil Mill is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Mohd Razaleigh bin Mohamad	Name: Shylaja Devi Vasudevan Nair
Company Name: BSI Services Malaysia Sdn. Bhd	Company Name: SD Guthrie Bhd
Title: Client Manager	Title: Head, Sustainability Compliance Unit, Group Sustainability Dept
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 13/05/2024	Date: 11/07/2024

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Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	(C) Documents that are specified in the RSPO P&C are made available to the public. - Critical (Major) compliance -	There is evidence that all documents that has been specified in the RSPO P&C has been made available to public. It has been verified based on the management systems that has been established through procedure which each operating units need to respond of any information request received. Each operating units need to verify and justify each request base on types of concerns. Process of request has been stipulated in the Standard operating manual (SOM) subsection 5.5; Procedure for external communication issuance date 01/04/2008. Other than that, policy of the company has been made available in the Sime Darby Plantation Berhad's website.	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	All the document/information has been established in both Bahasa Malaysia and English. As per conversation with the management, if there is any request from the stakeholder who need explanation, the management of each operating unit is responsible to explain the information to the stakeholders.	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	There is no information request has been received for all operating units and has been verified based on the records and interview with stakeholders where there is only request for assistance recorded. As per interview, any information request will be recorded in the logbook.	Complied

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1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	Documented in the standard operating manual (SOM) subsection 5.5, management responsibility; appendix 5.5.3.2, Procedure for external communication. Communication of the policy has been done through the stakeholders consultations that has been conducted on 23/11/2023 with attendance for various stakeholders for all operating units under SOU9- West POM.	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	List of stakeholders has been maintained and will be updated on annual basis or if there is any amendment of the stakeholders. Sighted information for the stakeholders has been maintained such as address and contact number.	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	SDPB established Code of Business Conduct where the company implemented the attitude of fair, integrity, and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The code established in Bahasa Malaysia and English. SDPB's Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 also includes the clause 'promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC).	Complied
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>	SDPB established Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The code established in Bahasa Malaysia and English. SDPB's Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 also includes the clause 'promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC).	Complied

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		<p>Tendering process has been established where tendering process will be initiated by operating units and will be approved by regional office. Once approve, the document will be forwarded to tendering committee and selection. There are some cases that direct awarded will be done due to certain circumstances such as insufficient supplier submitted quotation and others. Sample has been taken for the tendering process and compliance with the policy that has been established.</p> <p>Sime Darby Plantations also has established whistleblowing policy that has been made available at the website "Report Your Concerns (https://www.sdguthrie.com/who-we-are/corporate-governance/report-your-concerns/) if there is any in compliance of policy identified.</p>									
Principle 2: Operate legally and respect rights											
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.											
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>SOU 9 West POM and supply bases continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and SQM sustainability team. SOU 9 had obtained and renewed license and permits as required by the law. Among others the licenses/permit viewed were;</p> <table><tr><td>West Estate – License and Permits</td><td>Validity</td></tr><tr><td>License Air receiver, SL PMT 37321</td><td>22/04/2025</td></tr><tr><td>MPOB license no: 5229600-2000</td><td>31/08/2024</td></tr><tr><td>VMO Clinic – Perakuan Amalan Tahunan</td><td>31/12/2024</td></tr></table>	West Estate – License and Permits	Validity	License Air receiver, SL PMT 37321	22/04/2025	MPOB license no: 5229600-2000	31/08/2024	VMO Clinic – Perakuan Amalan Tahunan	31/12/2024	Non-compliance
West Estate – License and Permits	Validity										
License Air receiver, SL PMT 37321	22/04/2025										
MPOB license no: 5229600-2000	31/08/2024										
VMO Clinic – Perakuan Amalan Tahunan	31/12/2024										

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		KPDNKK Permit diesel storage – 20000 L B0058	23/01/2027	
		KPDNKK Permit petrol storage – 10000 L B0058	23/01/2027	
		JTK – Lesen Potongan Upah JTK JLD 32/53	Eff 06/07/2017	
		West Palm Oil Mill – License and Permits	Validity	
		MPOB license 533667-104000	30/06/2024	
		Majlis Perbandaran Kuala Langat no LKH017	Eff 21/12/2023	
		LUAS – Abstraction of water ref SWAL(P2) 01278	15/05/2024	
		DOE – License no 003180	30/06/2024	
		Boiler 1 PMD 17422	10/08/2024	
		Boiler 2 SL PMD 2293	09/11/2024	
		Sterilizer No 1 PMT 97113	09/11/2024	
		Sterilizer No 2 PMT 97112	28/08/2024	
		Sterilizer No 3 PMT 32700	09/11/2024	
		Sterilizer No 4 PMT 32699	09/11/2024	
		Sterilizer No 5 PMT 86560	09/11/2024	
		Sterilizer No 6 PMT 84676	09/11/2024	
		Crane A - SL PMA 18716	07/04/2025	

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		Crane B - PMA 5143	09/11/2024													
		Crane C - SL PMA 22952	09/11/2024													
		Air Receiver PMT148757 / PMT46411 / PMT9541	09/11/2024													
		Back Pressure Receiver PMT 31264	09/11/2024													
		Lesen Pemasangan Bekalan Elektrik 04452	Eff 20/06/2023													
		Meterology Corporation D230248 – 60 mt	Eff 01/02/2024													
		Meterology Corporation D230249 – 70 mt	Eff 01/02/2024													
		.														
		Factory and Machinery Act 1967 –														
		The following competency requirements were verified:														
		<table><tr><th>Competent person</th><th>Details</th></tr><tr><td>Steam engineer</td><td>2 Person - 2nd grade</td></tr><tr><td>Engine Driver (BHC)</td><td>4 - 2nd grade</td></tr><tr><td>Boilermen</td><td>4 Persons 2nd grade</td></tr><tr><td>Scheduled waste (CePSWaM)</td><td>1 Person</td></tr><tr><td>Effluent Pond (CePPOME)</td><td>2 Person</td></tr></table>		Competent person	Details	Steam engineer	2 Person - 2 nd grade	Engine Driver (BHC)	4 - 2 nd grade	Boilermen	4 Persons 2 nd grade	Scheduled waste (CePSWaM)	1 Person	Effluent Pond (CePPOME)	2 Person	
Competent person	Details															
Steam engineer	2 Person - 2 nd grade															
Engine Driver (BHC)	4 - 2 nd grade															
Boilermen	4 Persons 2 nd grade															
Scheduled waste (CePSWaM)	1 Person															
Effluent Pond (CePPOME)	2 Person															

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		AESP (Authorised Entrant and Standby Person for Confined Space)	8 competent persons	
		AGT (Authorised Gas Tester and Entry Supervisor for Confined Space)	1 competent person	
		Electrical Chargemen	1 A4 Chargemen	
		First Aider	7 Persons - July 2025	
		FFB allowable max processed by the mill in 2023 under MPOB license no 53323800-4000 is 240000 mt. The total actual processed from Jan - Dec 2023 is 149323 mt concluding compliance to the license requirement.		
Major Non-conformities				
<div>a) Line site inspection has been done weekly basis by the management for both operating units and there is no issues has been highlighted on housing drains</div> <div>b) As per internal audit conducted 04/10/2023 highlighted that the drain has been fill up with garden waste/domestic waste and the issues has been closed on 04/11/2023 and evidence has been provided by the management.</div> <div>c) However, during the site visit to block G, Bangkong Division, West Estate and Block J, West POM found out that the actual condition is contradicted with statement mentioned in the line site inspection and internal audit closure.</div>				

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		<p>d) As per internal audit conducted 04/10/2023 highlighted that the drain has been fill up with garden waste/domestic waste and the issues has been closed on 04/11/2023 and evidence has been provided by the management.</p> <p>Repeated Major Non-conformities has been identified in same indicator. Referred to RSPO certification system 2020 clause 5.9.4 (a) Recurring major NC on the same indicator (including the supply chain indicators) in successive audits shall lead to immediate suspension of the certificate. This suspension shall be lifted when the NC is successfully addressed. Suspension has been done on 06/03/2024 and has been lift up on 07/03/2024</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>The CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them. Each estate and mill had its own Legal and Other Requirements Register (LORR) and were being evaluated individually annually for compliance. The legal registers were updated by the PIC and approved by the respective Managers.</p> <p>The Group sustainability department (GSD) is responsible to track changes and the information was disseminated to all its plantations and Mill department. Among the applicable legal and included in the legal register are Pesticides Act 1974 and Regulations, Environmental Quality Act 1974 and Regulations, Factories and Machinery Act 1967 and Regulations, Occupational Safety and Health 01/7/2019. Act 1994, Employment Act 1955, Aboriginal Peoples Act 1954, Industrial Relations Act 1967, Children and Young</p>	Complied

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		<p>Persons (Employment) Act 1966, MPOB Regulations (Licensing) 2005.</p> <p>The documented procedures have been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10/12/2008.</p> <p>All legal requirement was documented in Legal and Other Requirement Register. Compliance to each applicable law and regulation is monitored by the operating unit. The legal register at the estate were reviewed/updated on a yearly basis / as and when needed for new updates/licenses. Sighted the document 'Summary of Compliance' available at the estate undersigned by the higher Management. The document lists the latest applicable laws and amendments, revision dates and acknowledgement by the management.</p> <p>The latest updated of LORR for the estate and mill was dated 23/07/2023 to include the "Garis Panduan Pelan Pengurusan Tandan Kosong Kelapa Sawit Feb 2021". The LORR had also being review thereafter annually latest on 10/01/2024 with no changes made.</p> <p>All the legal and other requirements were registered accordingly and documented in the legal requirement register including new updates for Employment Insurance System (EIS) Amendment Act 2023, Employees Social Security (Amendment) Act 2023 and Anti-Sexual Harassment updated in prior.</p>	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	The estate has installed boundary markers as sighted during the field visit. This confirmed that they have maintained boundary	Complied

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	- Minor compliance -	markers by installing the red/white pole and signage. There were also points whereby boundary stones are marked and identified. <table><tr><td>Estate</td><td>Field</td><td>Neighbouring Property</td></tr><tr><td>West Estate</td><td>P09G</td><td>Kg Judah</td></tr><tr><td>West Estate</td><td>P09G</td><td>East Estate</td></tr><tr><td>West Estate</td><td>P09G</td><td>Smallholder</td></tr><tr><td>West Estate</td><td>P09G</td><td>Kg Sg Kurau</td></tr></table>	Estate	Field	Neighbouring Property	West Estate	P09G	Kg Judah	West Estate	P09G	East Estate	West Estate	P09G	Smallholder	West Estate	P09G	Kg Sg Kurau	
Estate	Field	Neighbouring Property																
West Estate	P09G	Kg Judah																
West Estate	P09G	East Estate																
West Estate	P09G	Smallholder																
West Estate	P09G	Kg Sg Kurau																
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.																		
2.2.1	A list of contracted parties is maintained. - Minor compliance -	The list of contracted parties available as per stakeholder list 2024. Both the estates and the mill continued to maintain the stakeholder’s information (address, contact number, nominated representatives) which included the contractors, vendors/suppliers, foreign recruitment agencies, embassy, government agencies, schools, local communities, CPO/PK customers, etc. The list was updated respectively comprises of various parties, neighboring communities and Government Agencies.	Complied															
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	The agreements (selectively sampled) have included clauses in relation to requirement to meeting legal among others: It stated that the agreement is governed among others by the following responsibilities and compliance: Clause 5 - Labour & Human Rights Clause 6 - Environment Occupational Safety Health Clause 7 - Ethic & Management Practices Compliance with applicable laws and guidelines	Complied															

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		<ol style="list-style-type: none"> 1. To comply with all applicable laws, by-laws, rules, regulations 2. Not limited to laws in relation to employment, environment, OSH, anti-bribery, anti-slavery, human traffic <p>Company's Guidelines, Policies and Principles</p> <ol style="list-style-type: none"> 1. Obligations towards the Representative 2. All contractors are subject to KPI monthly evaluation. 3. General Commitment towards RSPO MSPO certification standards <p>Failure to provide the services and/or comply with laws and guidelines.</p> <ol style="list-style-type: none"> 1. Special obligations, covenants and undertaking of the transporter. 2. Applicable Laws 3. All contractors have signed (IIV - Ikrar Integriti Vendor) of respective dates and region. 	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>The contract signed with contractors as sighted in for all operating units with contractors, therein have included under clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC and Human Rights Charter protecting the rights of children.</p>	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins 	<p>The mill only received oil palm fruit bunches (FFB) from the SDP estates, primarily within SOU 9. Any additional FFB came from diversions due to breakdowns or annual maintenance at the sister</p>	Complied

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	<ul style="list-style-type: none">Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholderOne or more supporting documents for claimsValid MPOB license <p>- Critical (Major) compliance -</p>	<p>mill. During the audit, it was confirmed that all estates within SOU 9 met the following criteria:</p> <ul style="list-style-type: none">All FFB from the SDP estates were supported by delivery documents.Possession of valid land titles with ownership status (referencing indicator 4.4.1).Possession of valid MPOB licenses (referencing criteria indicator 2.1.1). <p>Delivery documents were cross-checked with the volumes of FFB received by the mill.</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 Indicator2.3.1.</p> <p>- Minor compliance -</p>	<p>There is no smallholders crop received or processed in West Palm Oil Mill.</p>	Complied						
Principle 3: Optimise productivity, efficiency, positive impacts and resilience									
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.									
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>West Estate continued to commit to long term economic and financial viability. The annual budgets for 2024 to 2028 were sighted. The budget covers activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance etc. The budget also included projections on yield/ha, and total cost of production per mt & per ha and CAPEX - capital expenditure mainly for buildings, furniture and others asset related expenses. The estate adopted the following format for the annual budget.</p> <table><tr><td>Year</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr></table>	Year	2024	2025	2026	2027	2028	Complied
Year	2024	2025	2026	2027	2028				

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		<table><tr><td>CPK Produced</td><td>8765</td><td>9337</td><td>9997</td><td>10049</td><td>10771</td></tr><tr><td>OER %</td><td>21.05</td><td>21.22</td><td>21.40</td><td>21.40</td><td>21.39</td></tr><tr><td>KER %</td><td>5.00</td><td>5.10</td><td>5.15</td><td>5.25</td><td>5.40</td></tr><tr><td>Administration</td><td>x</td><td>x</td><td>x</td><td>x</td><td>x</td></tr><tr><td>Processing cost</td><td>x</td><td>x</td><td>x</td><td>x</td><td>x</td></tr><tr><td>Depreciation</td><td>x</td><td>x</td><td>x</td><td>x</td><td>x</td></tr><tr><td>HQ charges</td><td>x</td><td>x</td><td>x</td><td>x</td><td>x</td></tr><tr><td>RM/mt FFB</td><td>x</td><td>x</td><td>x</td><td>x</td><td>x</td></tr><tr><td>RM/mt CPO</td><td>x</td><td>x</td><td>x</td><td>x</td><td>x</td></tr></table>	CPK Produced	8765	9337	9997	10049	10771	OER %	21.05	21.22	21.40	21.40	21.39	KER %	5.00	5.10	5.15	5.25	5.40	Administration	x	x	x	x	x	Processing cost	x	x	x	x	x	Depreciation	x	x	x	x	x	HQ charges	x	x	x	x	x	RM/mt FFB	x	x	x	x	x	RM/mt CPO	x	x	x	x	x	
CPK Produced	8765	9337	9997	10049	10771																																																				
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HQ charges	x	x	x	x	x																																																				
RM/mt FFB	x	x	x	x	x																																																				
RM/mt CPO	x	x	x	x	x																																																				
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	<p>The long-range replanting programs (LRRP) until 2028 were sighted. The program was reviewed yearly and incorporated into the annual financial budget. The program sighted for the next 5 years in ha is as follows:</p> <table><tr><td>Year</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>Ha</td><td>183.93</td><td>239.76</td><td>251.40</td><td>290.53</td><td>0.00</td></tr></table>	Year	2024	2025	2026	2027	2028	Ha	183.93	239.76	251.40	290.53	0.00	Complied																																										
Year	2024	2025	2026	2027	2028																																																				
Ha	183.93	239.76	251.40	290.53	0.00																																																				
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	<p>The Management Review was held as follows chaired by the respective Managers:</p> <table><tr><td></td><td>Date</td><td>Attendee</td><td>Date</td><td>Attendee</td></tr><tr><td>West Estate</td><td>03/01/2024</td><td>22</td><td>03/11/2023</td><td>26</td></tr><tr><td>West POM</td><td>18/01/2024</td><td>24</td><td>24/02/2023</td><td>24</td></tr></table>		Date	Attendee	Date	Attendee	West Estate	03/01/2024	22	03/11/2023	26	West POM	18/01/2024	24	24/02/2023	24	Complied																																							
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		<p>The agenda discussed among others includes the following;</p> <ul style="list-style-type: none"> a) Results of internal audits b) Customer feedback c) Process performance and product conformity d) Status of preventive & corrective actions e) Follow up action from management review f) Changes that could affect the management system g) Recommendation for improvement <p>Minutes of meeting for the estate and the mill were sighted and verified. No major issues were highlighted during the meeting. Main focus is on the forthcoming external RSPO audit in Feb 2024.</p>	
Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.			
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>This has been established in the Continuous Improvement Plan 2024 updated in Jan 2024 respectively for both the Mill and Estate. This compilation was made with subject to the consideration of the main social and environmental impacts. These include to continue engagement with relevant stakeholders (workers, surrounding communities, government agencies, agencies, suppliers and contractors. Management documents related to environmental plans and impact assessments maintained available. Among the documents were:</p> <ul style="list-style-type: none"> (a) Environmental Aspect Identification (EAI) and Environmental Impact Evaluation (EIE) registers. (b) Environmental Improvement Plan 2024 (c) Pollution Prevention Plan 2024 (d) Water Management Plan. 2024 (e) Waste Management Plan 2024 	Complied

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	<p>In SOU 9 the yield performance, extraction ratios and production costs have always been in utmost priority in ensuring long-term economic and financial viability. In general, various efforts had been made to optimize the yield of the plantation among others;</p> <ul style="list-style-type: none">a) maximizing crop recovery, optimum ripenessb) standard (harvest ripe bunches only and 100% loose fruit collection),c) the soil fertility was maintained and planting only high yielding planting material.d) To mechanize operation where feasible to reduce reliance of labour. <p>The Continuous Management Plan 2024 for the estate/mill operations among others include the following projects;</p> <table><tr><th>Section</th><th>West Estate - Details</th></tr><tr><td>Environmental</td><td>New Pipeline 6 km to Div 4& 6 – RM620K</td></tr><tr><td>Social</td><td>Replacement o/h electric cable - RM162K</td></tr><tr><td>Social</td><td>Upgrading roofing/ceiling workers Q - RM132K</td></tr><tr><td>Environmental</td><td>Rock revetment at P07G3 tide gates – RM330K</td></tr><tr><td>Social</td><td>Concrete road Air Hitam Division RM1.5M</td></tr><tr><td>Environmental</td><td>Bund rehabilitation works – RM223K</td></tr><tr><td>Environmental</td><td>Install flood lift pump West Division – RM600K</td></tr><tr><td>Environmental</td><td>Bund heightening West Div 2500m– RM448K</td></tr></table>	Section	West Estate - Details	Environmental	New Pipeline 6 km to Div 4& 6 – RM620K	Social	Replacement o/h electric cable - RM162K	Social	Upgrading roofing/ceiling workers Q - RM132K	Environmental	Rock revetment at P07G3 tide gates – RM330K	Social	Concrete road Air Hitam Division RM1.5M	Environmental	Bund rehabilitation works – RM223K	Environmental	Install flood lift pump West Division – RM600K	Environmental	Bund heightening West Div 2500m– RM448K	
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3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE:</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>Production data including the FFB processed and CPO, CPK produced has been checked and verified against the Jan - Dec 2023 report. Inclusive is OER/KER. This data has also being compared and tally with the GHG report declaration.</p>	Complied																										

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	- Minor Compliance -		
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Standard Operating Procedures (SOPs) for the estate and mill has been established. Sime Darby SOP issued dated 02/01/2008 and Agricultural Reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units as a guidance document to conduct estate operation. The estate also holds the Safety Work Procedure. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc.</p> <p>Palm Mill holds two SOPs: Sustainable Plantation Management System (SPMS) version 1 dated 1/11/2008 and Mill Quality Management System version 1 dated 1/11/2008 as a guidance document to operate the mill.</p> <p>For Health, Safety and Environment, both mill and estates, Sime Darby has issued Health, Safety and Environment (HSE) Management System and Standard Operating Procedures. Sime Darby continuously updated the SOP established. Among the updated SOP FY 2022 and 2024 as follows:</p> <ol style="list-style-type: none"> 1. UM HSE Management System Manual, UM/HSE/MS/01 2. First Aid in Workplace Procedure, UM/HSE/OCP/01 3. Safety Harvesting Procedure, UM/HSE/OCP/02 4. Personal Protective Equipment Procedure, UM/HSE/OCP/03 5. Chemical Safety Management Procedure, UM/HSE/OCP/04 6. Permit to Work (PTW) Procedure, UM/HSE/OCP/05 7. OSH Risk Management Procedure, UM/HSE/SE/01 	Complied

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		<p>8. Guidelines on Establishment on Gender Committee 2024 V2 January 2024</p> <p>9. Sustainable Supply Chain And Traceability Procedure for Upstream Malaysia, SDP/GSD/202401/SCCS dated January 2024</p> <p>10. e-Sime+ System Procedure, UM/HSE/OCP/12 dated 01/04/2023</p>	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	A system for verifying the consistency of estate and mill implementation procedures was established. This system includes various mechanisms such as Performance Monitoring Visits, SORA/SCRA visits, Agronomist visits, and Internal Audits.	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>West POM</u></p> <ol style="list-style-type: none"> 1. Internal Audit Report: 03/10/2023 2. Structured Oil Recovery Assessment (SORA): 23-27/10/2023 <p><u>West Estate</u></p> <ol style="list-style-type: none"> 1. Performance Monitoring Visit Report dated 12/10/2023 2. Internal Audit Report dated 04/10/2023. 3. Structured Crop Recovery Assessment Report (SCRA), Mature Upkeep Assessment (MUA) report dated 23-27/10/2023. 	Complied
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			

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3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting or new operations for both West POM and West Estate. SOU 9 West POM and supply bases has a separate Social Impact Assessment (SIA) and Environmental Impact Assessment reports. It mentioned the objectives, category, action, frequency, person in charge and monitoring period. The aspect and impact analysis for all the mill/estate operations are documented and revised annually on respective dates in 2024. In the comprehensive report, the study of aspect and impact are aimed to;</p> <ul style="list-style-type: none"> a) Plan to avoid negative impact and to promote positive impacts. b) Reduction disposal of waste taking into consideration of social responsibilities. c) Plan to reduce pollution and release of GHG d) Development and implementations. <p>The plans and impact assessments relating to environmental impacts based on documents for the estate and mill are elaborated in the following records: The plans and impact assessments relating to environmental impacts based on documents for the estate and mill are elaborated in the following records:</p> <ul style="list-style-type: none"> a) Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, (Version 1; year 2008 Issue no. 1; dated 1 April 2009 Register) b) Appendix 5.4.1c - Environmental Aspect and Impact Identification form (Version 1; year 2008 Issue no. 1; dated 1 April 2009; MR-01/EIA) c) Appendix 5.4.1d – Environmental Impacts Evaluation form 	Complied
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		<p>(Version 1; year 2008 issue no. 1; dated 1 April 2009; MR-02/EIE)</p> <p>The EIA as detailed in the estate register covers all estate activities/operations. The latest register being reviewed dated 23/02/2024. There were no changes since the last review. The significant environmental aspects related to the estate operation among others include the following;</p> <ul style="list-style-type: none"> a) FFB transportation to the mill. b) Movement of vehicles/transportation of estates machines and tractors. c) Herbicide/pesticides spraying d) Anti-malaria fogging e) Road resurfacing & grading f) Grass cutting g) construction activities h) harvesting, pest and disease, i) upkeep programme j) nursery / replanting <p>Similarly, the environmental aspects for the mill are tabulated in the EIA master list (EIA/MOM/2013/001—1ME to EIA/2015/MOM/020) updated on respective dates in 2024 Among others the EIAs are divided into the all stations in the mill processing as listed below.</p> <ul style="list-style-type: none"> a) the boiler stack emission, black smoke b) palm oil mill effluent (POME) discharge and water contamination, c) Activities related to managing of scheduled wastes and general waste. 	
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		<p>d) Activities of all operations beginning from the mill entrance ending to the effluent, EFB operations</p> <p>The methodology of the assessment was through field interview with stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, schools' representatives, officers from government authorities and internal workers. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community, education, safety and health, living condition, infrastructure and amenities and stakeholder engagement were assessed accordingly.</p> <p>The documents are maintained, sighted and verified</p> <p>New social impact assessment has been conducted for both operating units under SOU 9 West and has been documented in Social Impact Assessment (SIA) report conducted from 22-24/01/2024 conducted by sustainability compliance unit, group sustainability department. The assessment has been done through site visit, verification through documentation and interview with both internal and external stakeholders. Positive and negative impact has been identified as outcome from the assessment.</p> <p>West Estate</p> <ol style="list-style-type: none">1. Workers for FFB loading responded that he has not been provided with glove and need to purchase by their self.2. Workers at Block G complaint on unrepaired ceiling has complaint has been done through OPP few months back	
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		<ol style="list-style-type: none"> 3. Ceiling leakage at Tadika was last reported to assistant 3 months ago. 4. Workers requested management to improve road condition along Dusun 6 and Dusun 7 which connected the estate to the nearby local communities. <p>West POM</p> <ol style="list-style-type: none"> 1. No separation of toilet between man and woman in the POM 2. Workers claimed that they have not received their passport after 5 months of working. 3. Workers requested for management to improve road condition at the line site. 4. Workers requested for management to improve road condition at Jalan Air Hitam. 	
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>SOU 9 West has a separate Social Impact Assessment (SIA) and Environmental Impact Assessment reports. It mentioned the objectives, category, action, frequency, person in charge and monitoring period.</p> <p>Among others as summarized below:</p> <ol style="list-style-type: none"> a) To ensure compliance to SOP and legal requirement regarding social (appointment of person in charge/committee to handle social matters, communication on policies/SOP on social to relevant stakeholders, monitoring of pay and agreement of workers and contractor's workers and to maintain housing and facilities provided to workers). based on inputs received from external stakeholders during stakeholder meetings, union meetings, JCC meetings, and Gender Committee 	Complied

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	<div><div>b) To contribute to local communities’ development based on inputs received from external stakeholders during stakeholder meetings, union meetings, JCC meetings, and Gender Committee meetings.</div><div>The aspect and impact analysis for all the mill/estate operations are documented and revised annually recent being Jan 2024. In the comprehensive report, the study of aspect and impact are aimed to;</div><div><div>a) Plan to avoid negative impact and to promote positive impacts.</div><div>b) Reduction disposal of waste taking into consideration of social responsibilities.</div><div>c) Plan to reduce pollution and release of GHG</div><div>d) Development and implementations.</div></div><div>The aspect and impact covered the following activities/operations among others;</div><div><table><tr><td>West Estate Activities</td><td>West Estate Activities</td></tr><tr><td>Poisoning of VOP/ woodies</td><td>Fertilizer storage /application</td></tr><tr><td>Circle spraying</td><td>EFB application</td></tr><tr><td>Management of empty containers</td><td>Vehicle maintenance by contractor</td></tr><tr><td>Rat baiting</td><td>Grass slashing</td></tr><tr><td>Diesel Reception</td><td>Chemical’s storage</td></tr><tr><td>Triple rinsing</td><td>Grading of FFB</td></tr></table></div><div><table><tr><td>West POM - Operations</td><td>West POM - Operations</td></tr></table></div></div>	West Estate Activities	West Estate Activities	Poisoning of VOP/ woodies	Fertilizer storage /application	Circle spraying	EFB application	Management of empty containers	Vehicle maintenance by contractor	Rat baiting	Grass slashing	Diesel Reception	Chemical’s storage	Triple rinsing	Grading of FFB	West POM - Operations	West POM - Operations	
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		<table><tr><td>Effluent treatment</td><td>EFB storage</td></tr><tr><td>Engine room operations</td><td>Laboratory</td></tr><tr><td>Boiler operations</td><td>Workshop operations</td></tr><tr><td>CPO storage</td><td>Sterilization</td></tr><tr><td>Diesel Reception/storage</td><td>Chemical's storage</td></tr><tr><td>Triple rinsing</td><td>Scheduled wastes storage</td></tr></table> <p>While for social aspect, Management plan sighted for both operating units and has been documented in the social management plan For West POM, it has been updated on 02/01/2024. Stated in the management plan that gender committee will be conducted every 3 months, social dialogue on monthly basis and additional water tanker for domestic water supply.</p>	Effluent treatment	EFB storage	Engine room operations	Laboratory	Boiler operations	Workshop operations	CPO storage	Sterilization	Diesel Reception/storage	Chemical's storage	Triple rinsing	Scheduled wastes storage	
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Triple rinsing	Scheduled wastes storage														
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The Social/Environmental Action Plan 2024 are available for each unit were available having information i.e issues, management plan, PIC and time frame. The inputs are gathered from the meeting minutes among others;</p> <p>a) Gender Committee, NUPW, b) ESH Meeting, c) Complaint & Request from internal & external stakeholders and muster briefing).</p> <p>The EIA management were reviewed respectively as shown below;</p> <table><tr><td>OU</td><td>Review date</td><td>Updates</td></tr><tr><td>West Estate</td><td>23/02/2024</td><td>No changes</td></tr></table>	OU	Review date	Updates	West Estate	23/02/2024	No changes	Complied						
OU	Review date	Updates													
West Estate	23/02/2024	No changes													

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			West POM	02/01/2024	No changes		
Criterion 3.5: A system for managing human resources is in place.							
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -	Guideline for recruitment of local workers year 2020 which has outlined the process of recruitment which has been divided into 2 which are pre recruitment and post recruitment. For pre recruitment, the management shall identify vacant positions in the operating units. Interested parties can fill up the applications and will be screened and short listed by the management. During the interview, the assistant manager needs to brief about the jobs, tasks and expectations and list for successful application need to be approved by the manager and proceeds with the medical. While for migrant workers, documented in the migrant worker responsible recruitment procedure year 2021.				Complied	
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Sample of 12 newly recruited workers in year 2023 has been taken by auditor for verification which include workers from different origin countries, gender and races. It has been verified that the recruitment procedure has been implemented and all records has been maintained. For local workers, verified job application form, records for interview, medical check up records and offer letter. While for foreign workers, records verified is medical check up (FOMEMA), and offer letter. As per interview with workers, it has been confirmed that the recruitment process is inline with the procedure. There is no promotion and termination has take place in year 2023 and has been confirmed through interview, document review.				Complied	
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.							

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3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad have established Standard Operating Procedure for Risk Assessment and documented in EQMS/SOM sub-section 5.4, Appendix 5.4.1a. Risk were identified and assessed in accordance with the established HIRARC an also in compliance to legal requirements as stated below.</p> <p><u>West Palm Oil Mill</u></p> <ol style="list-style-type: none"> 1. HIRARC was available to address all the risks and hazards associated to the operations in the estate. The HIRARC was reviewed on 05/01/2024. HIRARC review for Maintenance of building, Reception, Clarification and Digester and Screw Press. 2. Chemical Health Risk Assessment was conducted in the mill in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000. CHRA Report Reference Number: HQ/09/ASS/XX/XXX – 2020/XXXX; by CHRA Assessor with DOSH Reg Number: HQ/09/ASS/00/124; Date of Assessment: 15/07/2022. 3. Medical Surveillance Programme has been performed successfully for the year 2023 for the mill workers exposed to hazardous chemicals and fumes. A total of 21 workers have been examined on 15/12/2023 at Klinik XXXXXX. The results indicated that all workers were declared fit to work. 4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. Noise Risk Assessment (NRA) has been conducted by AXXX HXXXX IXXXXXXXXX on 26/02/2021. NRA Report (Report Number: HQ/LPROYKPEB/21/00303) available for verification. Review on NRA has been made on 18/03/2021 with report 	Non-compliance
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		<p>reference number ALM/NOISE/WOM/XXXX/XXXX. The recommendation stated by the assessor have been affectively addressed as verified.</p> <ol style="list-style-type: none"> 5. An audiometric testing was done on 06/06/2023 for 3 mill employees deemed to be exposed to excessive noise in the mill. The test was conducted by PXXXXXXX EXXXXXXXXX (M) Sdn Bhd. The report indicated that no workers had Standard threshold shift. 3 workers has been categorized on Non Work Related. Recommendation by assessor was continue annual audiometry test with PHP Training. 6. Chemical Exposure Monitoring has been conducted on 20/11/2023 by Klinik HXXXXXXXXX. Parameter monitored were n-Hexane. The sampling and laboratory analysis were based on NIOSH Manual Analytical Methods (NMAM) and Occupational Safety and health Administration Methods (OSHA). 7. Annual Local Exhaust Ventilation (LEV) System Examination has been conducted on 14/02/2023 by AXXX HXXXX IXXXXXXXXX. The LEV systems being examined and tested was laboratory fume hood. Result were complied with the parameter by DOE specification. 8. Workplace Inspection has been conducted on monthly basis. Refer Record "Pemeriksaan Tempat Kerja" for the month of December 2023 and January 2024. <p><u>West Estates</u></p> <ol style="list-style-type: none"> 1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Harvesting, Spraying, Manuring and General Store. Verification done on the documentations and operations 	
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		<p>indicated that all the risk controls were adhered to. Last updates sighted on 07/02/2024.</p> <p>2. Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The Chemical Health Risk Assessment Report (Ref. Number: HQ/09/XXX/XX/XXX – 2020/0032 conducted by XXXXXX Consultancy (DOSH Registration: HQ/09/XXX/XX/XXX) on 11/11/2020 was available for verification.</p> <p>3. Medical Surveillance were conducted in the estate based on the recommendation of the CHRA for workers exposed to hazardous chemicals. Results of annual medical surveillance were available in the estates for verification as follows.</p> <p>The medical surveillance programme for the year 2023 has been performed on 30/03/2023 at Klinik XXXXXX for 18 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work.</p> <p>4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA Report were available for verification at all the sampled sites. The recommendation stated by the assessor have been affectively addressed as verified.</p> <p>Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the estates. The assessment was conducted on 26/10/2021 by RXXXXX SXXXXXXX (M) Sdn Bhd</p>	
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		<p>The assessment report (Ref. No: HQ/10/PEB/XX/XXX – XXX/2021) was available for verification.</p> <p>5. Audiometric Testing was done in the estate dated 24/05/2023 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 48 workers deemed to be exposed to excessive noise in the estate. The results indicated that 10 workers had abnormal audiometric results. The retest has been conducted on 07/08/2023 and summarized its non work related.</p> <p>6. Workplace inspection has been conducted. Latest record verified dated 06/11/2023, 16/11/2023, 17/11/2023, and 15/12/2023.</p> <p>Major Non-conformities</p> <p>Mitigation plans and procedures related chemical handling in CHRA was not fully implemented.</p> <ul style="list-style-type: none"> • Site visit at West Estate General Store Div 4, it was found petrol and used lubricant was stored in the containers without any labelled. • Site visit at West POM, Guard Post of Workshop, it was found that petrol was stored in the containers without any labelled. <p>It was not in line with CHRA Report dated 11/11/2020 Section 8.1 Further Actions to control risks, 8.3 Labeling and relabeling "Under USECHH Regulation 2000: When a chemical hazardous to health is transferred into other container, other than that in which it was usually supplied, and the contents of that containers wre used within a normal work shift, the employer shall ensure that the</p>	
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		<p>container is relabeled with the chemical name as per the original label".</p> <ul style="list-style-type: none"> Site visit at West Estate General Store Div 4, it was found chemicals Hydrochloric Acid, Glyphosate, Impact 75 and Lubricant 2T were placed there without SDS. <p>It was not in line with CHRA Report dated 11/11/2020 Section 8.0 Recommendation "To ensure hardcopy of SDS available and at conspicuous are for reference at site".</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The Annual Health and Safety Plan for both the estate and mill is largely implemented through the Annual Training Program 2023. This implementation is monitored through inspections aimed at addressing identified health and safety risks. The focus is on ensuring safe work practices by:</p> <ul style="list-style-type: none"> Providing employees with the knowledge and skills necessary to perform their work safely and prevent hazards that could endanger themselves or others. Increasing awareness and understanding of workplace hazards, and teaching employees how to identify, report, and control them. Offering specialized training for tasks involving unique hazards. <p>In addition to formal classroom training, other methods such as on-the-job training and worksite demonstrations are utilized to effectively communicate safety concepts, ensure comprehension of hazards and their controls, and promote good work practices.</p> <p>The safety performance of each Operating Unit is monitored through various channels, including:</p>	Complied

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		<ul style="list-style-type: none"> • Internal Audits conducted by the Group Sustainability Department. • Work Site Inspections (WSI) by the site Occupational Safety and Health (OSH) Committee. • Direct involvement of supervisors and rounds conducted by Assistant Managers. • Reporting of safety incidents via Rapid4. • Health/medical surveillance. • Chemical exposure monitoring. • Audiometric Monitoring. • Daily Monitoring Checklist such as the Personal Protective Equipment (PPE) Checklist. <p>The results of monitoring activities are discussed at meetings and communicated to employees. When necessary, appropriate corrective actions are taken to address identified issues.</p>	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units visited have conducted a training needs analysis for all employees, management, and contractors. This analysis was based on job designations and the specific training requirements associated with each job type. Trainings were identified for management, employees, and contractors, and these were scheduled throughout the fiscal year 2023. The identified training programs cover aspects related to safety and health, environmental concerns, and social responsibilities.</p> <p>The certification units of SOU 9 implemented measures to assess the participants' understanding, including:</p>	Complied

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		<ul style="list-style-type: none"> • Completion of post-training evaluation/feedback forms by participants, allowing them to provide suggestions. • Assessment of knowledge acquisition and behavioral application by immediate supervisors in the workplace following the training sessions. <p>Random interviews with workers indicated a clear understanding of various aspects, including:</p> <ul style="list-style-type: none"> • Knowledge about the Roundtable on Sustainable Palm Oil (RSPO) and the company's or SDP policies. • Familiarity with their work/job Standard Operating Procedures (SOPs) and awareness of the consequences of deviation from these procedures. • Understanding of the importance of wearing Personal Protective Equipment (PPE), ability to demonstrate proper donning of PPE, and awareness of when PPE should be changed. • Knowledge of fire extinguisher usage. • Understanding of workplace hazards, associated risks, and necessary control measures. • Adherence to safe work practices. <p>These findings suggest a comprehensive understanding and application of essential safety, health, and operational procedures among the workforce</p>	
3.7.2	Records of training are maintained. - Minor Compliance -	<p>The operating units maintained the training records conducted. Reviewed the training records as follows:</p> <p><u>West POM</u></p>	Complied

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		Training	Date
		E Sime+ System, OPP and CA Training	06/02/2024
		PPE Training	06/02/2024
		Boiler Emergency Shutdown Training	26/12/2023
		Maintenance Equipment Training	08/12/2023
		MSDS and CSDS Training	06/12/2023
		Working at height Training	25/08/2023
		Chemical Handling Training	07/04/2023
		Fire Drill and ERP Training	31/03/2023
		First Aid Training	13/01/2023
		Accident Investigation Training	19/04/2023
		Hearing Conservation Training	03/07/2023
		<u>West Estate</u>	
		Training	Date
		Fire Drill Training	21/07/2023
		First Aid Training	13/01/2023
		PPE, Tools, Safety and health Training	16/08/2023
		PTW Training to PIC	09/11/2023

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		<table><tr><td>Briefing on E Sime +</td><td>25/03/2023</td></tr><tr><td>HIRARC, Safety & E Sime +</td><td>21/09/2023</td></tr><tr><td>Workshop Training</td><td>01/11/2023</td></tr><tr><td>Company Policy Training</td><td>01/03/2023</td></tr><tr><td>PPE for Upkeep and Harvesting</td><td>16/01/2023</td></tr><tr><td>Hearing Conservation Programme</td><td>18/10/2023</td></tr></table>	Briefing on E Sime +	25/03/2023	HIRARC, Safety & E Sime +	21/09/2023	Workshop Training	01/11/2023	Company Policy Training	01/03/2023	PPE for Upkeep and Harvesting	16/01/2023	Hearing Conservation Programme	18/10/2023	
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Hearing Conservation Programme	18/10/2023														
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor Compliance -	Training conducted from time to time to all personnel critical in SCCS effective implementation. Latest training was conducted by Regional Sustainability & Quality Management (RSQM) personnel, attended West Mill Manager, Assistant Mill Manager, Lab Supervisor, Lab Despatch Operator, Weighbridge Clerk and Auxiliary Police. Refer Training record dated 31/07/2023. Training for transporter has been conducted on 08/11/2023.	Complied												
Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C) . However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)															
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB	Refer Sustainable Supply chain and Traceability Procedure dated January 2024 with reference number SD/GSD/202401/SCCS 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. FFB were obtained from all Sime Darby certified estates only. There was no third party's crop nor non-certified FFB received by the mill. This was verified during the stakeholders meeting and site visit at mill.	Complied												

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	without physically separating them, then only Mass Balance Module is applicable.	A per Section 9.2 stated RSPO IP Mills to include RSPO MB Supply Chain is mainly to enable the sales of products through the RSPO MB Option.	
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>West Palm Oil Mill processed the FFBs from its owned supply base (West Estate) and other SDP owned plantations/estates that are certified against the RSPO P&C. However, the management of SDP decided to include Mass Balance Module into the Scope of Certification.</p> <p>As per Section 9.2 of the revised procedure, it stated that RSPO IP Mills to include RSPO MB Supply Chain is mainly to enable the sales of products through the RSPO MB Option.</p> <p>Despite adding the Mass Balance Module in the Scope of Certification, West Palm Oil Mill still only processes FFBs from its owned supply base (West Estate) and other SDP owned plantations/estates that are certified against the RSPO P&C. Furthermore, the mill strictly refrains from accepting and processing FFBs from Outside Crop Producers (OCPs), including independent smallholders, collection centers, or other third parties.</p> <p>In line with this operational framework, any RSPO Identity Preserved (IP) Certified Sustainable Palm Oil (CSPO) or RSPO IP Certified Sustainable Palm Kernel (CSPK) products are only downgraded to RSPO Mass Balance (MB) CSPO or RSPO MB CSPK after being loaded into the truck tank or truck trailer for transportation to the refinery, as determined by the Global Trading Marketing (GTM) Department.</p>	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. The actual tonnage produced from last audit date is reported in the summary in Table 7 and Table 10.	Complied

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	the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>The mill meets all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform as following:</p> <ul style="list-style-type: none"> • License ID: CB147109 (Active) • Member Name: Strategic Operating Unit (SOU 9) – West Palm Oil Mill • Member ID: RSPO_PO1000000103 • RSPO Membership Number: 1-0008-04-000-00 (Sime Darby Plantation Berhad) • Type of Business: Oil mill • Start Date: 19-06-2023 • End Date: 18-07-2024 	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 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 	<p>Documented Procedures were made available for verification and the requirements have been adhered to as follows:</p> <ol style="list-style-type: none"> The Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024) has been revised at Section 9.2, 10.8, Appendix 2 for the inclusion of new clauses under Process Monitoring, Product Despatch, and Rules for FFB Diversion as to reflect the inclusion of RSPO IP Mills with RSPO MB Supply Chain as Scope Extension. The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 in Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024). 	Complied

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	<p>to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>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.</p> <p>c) Section 4.1 of Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024) stated "The Head of Operating Unit shall have the overall responsibility for the implementation of this SOP".</p> <p>Section 4.2 of Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024) stated "The Head of Operating Unit may assign roles to relevant personnel or invite personnel from various departments where necessary to assist in the implementation of this SOP". Therefore, the Mill management have identified and appointed the Assistant Mill Manager as the PIC for RSPO Supply Chain Certification Standard requirements as stated in Sustainable Supply chain and Traceability Procedure dated January 2024 Section 4.0 Responsibilities. Sighted the appointment letter dated 28/09/2023.</p> <p>d) Procedures for receiving and processing certified and non-certified FFBs were addressed in the Sustainable Supply chain and Traceability Procedure dated January 2024 Section 7.0 Receiving FFB at the Mill.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	<p>i) The procedure to conduct annual internal audit is addressed in the Sustainable Supply chain and Traceability Procedure dated January 2024. Refer section 18.0 Internal Audit. Refer latest SCCS Internal Audit dated 08/10/2023. Based on the internal audit report and checklist, the elements of RSPO supply chain were adequately covered including the RSPO Market Communications and Claims elements.</p>	Complied

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	<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>ii) There was one non-conformity raised from the internal audit. For non-conformity, corrective action has been established to rectify the lapse found. The status of the non-conformity also be discussed in the management review meeting. Verified that all internal audits records and report was properly retained by the Mill.</p>	
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>West POM maintain the daily records of all certified and uncertified FFB received and documented in daily processing records. The records include the FFB suppliers, weight, and vehicle transportation details. The mill has maintained records of FFB received such as Delivery Notes and Weighbridge operator. Sample of FFB delivery records:</p> <p>Incoming FFB Certified Supply Base West Estate Ticket number 346602 Date 04/01/2024 Supplier: E152_ West Estate Total tonnage: 9.47mt</p> <p>Ticket number 346547 Date 04/01/2024 Supplier: E152_ West Estate Total tonnage: 9.47mt Ticket number: 345368 Date: 05/12/2023</p>	Non-compliance

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		<p>Supplier: E016_ Sungai Buloh</p> <p>Ticket number: 345337</p> <p>Date: 05/12/2023</p> <p>Supplier: E153_ East</p> <p>Mechanism to handle non-conforming FFB and documents has been detailed up in the Procedure Sustainable Supply chain and Traceability Procedure dated January 2024 Section 11.0.</p> <p>Major Non-conformities</p> <p>CB was not informed on the projected overproduction of certified tonnage.</p> <p>Based on verification of Pre-Audit Info 2024, Palm Trace and Mass Balance Sheet Record of West POM, it was found that there is overproduction of certified tonnage compared to Estimated FFB, CPO and PK based on 12 month running data. Data as below:</p> <table> <tr> <th></th><th>FFB, MT</th><th>CPO, MT</th><th>PK, MT</th></tr> <tr> <td>Estimate (Mar 23-Apr 24)</td><td>123,966.69</td><td>24,585.95</td><td>5,968.51</td></tr> <tr> <td>Production (Jan 23–Dec 2023)</td><td>149,636.78</td><td>29,914.32</td><td>6,971.14</td></tr> <tr> <td>Variance</td><td>-25,670.09</td><td>-5,328.37</td><td>-1,002.63</td></tr> </table>		FFB, MT	CPO, MT	PK, MT	Estimate (Mar 23-Apr 24)	123,966.69	24,585.95	5,968.51	Production (Jan 23–Dec 2023)	149,636.78	29,914.32	6,971.14	Variance	-25,670.09	-5,328.37	-1,002.63	
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		Based on Palm Trace, there is no additional volume data resulting from CB was not informed on overproduction of certified tonnage.	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>West POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</p> <p>CPO – IP</p> <p>Sample 1</p> <ul style="list-style-type: none"> a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; West POM c) The loading or shipment / delivery date; 08/12/2023 d) The date on which the documents were issued; 08/12/2023 e) RSPO Certificate Number: RSPO 543594 f) A description of the product: CPO IP g) The quantity of the products delivered; 40.15 Mt h) Any related transport documentation; NDBXXXX i) A unique identification number: 024XXX, Contract: S/PSD/XXXX/CPOXXXXX <p>Sample 2</p> <ul style="list-style-type: none"> a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; West POM c) The loading or shipment / delivery date; 28/11/2023 d) The date on which the documents were issued; 28/11/2023 e) RSPO Certificate Number: RSPO 543594 f) A description of the product: CPO IP g) The quantity of the products delivered; 40.11 Mt 	Complied

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		<p>h) Any related transport documentation; BLHXXXX</p> <p>i) A unique identification number: 024XXX, Contract: S/PSD/XXXX/CPOXXXXX</p> <p>PK – IP</p> <p>Sample 1</p> <p>a) The name and address of the buyer; BUYERXXXXXX</p> <p>b) The name and address of the seller; West POM</p> <p>c) The loading or shipment / delivery date; 20/10/2023</p> <p>d) The date on which the documents were issued; 20/10/2023</p> <p>e) RSPO Certificate Number: RSPO 543594</p> <p>f) A description of the product: PK IP</p> <p>g) The quantity of the products delivered; 17.76 Mt</p> <p>h) Any related transport documentation; BKRXXXX</p> <p>i) A Unique identification number: 024XXX, Contract: S/PSD/XXXX/PKXXXXX</p> <p>Sample 2</p> <p>a) The name and address of the buyer; BUYERXXXXXX</p> <p>b) The name and address of the seller; West POM</p> <p>c) The loading or shipment / delivery date; 20/10/2023</p> <p>d) The date on which the documents were issued; 20/10/2023</p> <p>e) RSPO Certificate Number: RSPO 543594</p> <p>f) A description of the product: PK IP</p> <p>g) The quantity of the products delivered; 19.79 Mt</p> <p>h) Any related transport documentation; BLRXXXX</p>	
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		<p>i) A Unique identification number: 024XXX, Contract: S/PSD/XXXX/PKXXXXXX</p> <p>Based on the review of MB Sheet and RSPO PalmTrace, it is confirmed that there is no CSPO/MB and CSPK/MB was sold or registered for period of Feb 2023 – Jan 2024.</p> <p>The implementation of the Supply Chain Requirements for Mills outlined in the RSPO Principles and Criteria 2018 remains unchanged for the West Palm Oil Mill. This is related to the incoming FFBs, outgoing CPO and PK, maintenance of RSPO PalmTrace records, and documentation upkeep, among others. is remained same as the oil mill is awaiting approval for the extension of scope to include the MB Module in its certification. Once the extension of scope is approved, the management will conduct the Sales and Goods Out accordingly. This will be follow-up during the next assessment.</p>	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure</p>	<p>West POM has established Standard Operating Procedure related Outsourcing Activities. Refer Sustainable Supply chain and Traceability Procedure dated January 2024 with reference number SDP/GSD/202401/SCCS Section 13.0.</p> <p>i. Stated in the SOP, CPO mill cannot outsource processing activities like refining or crushing. Outsourcing activities for West POM was for CPO and PK transportation.</p> <p>ii. Sighted the contract agreement between Sime Darby Plantation Berhad and contractor:</p> <p>a) West POM has legal ownership of all input material to be included in the outsourced process. Refer listing of FFB Supplier Certified and Non-Certified. The contract</p>	Complied

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	<p>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>agreement and details like MPOB licence were kept in the file.</p> <p>b) Refer Contract Agreement between Sime Darby Plantation Berhad and CPO Transportation (MX BXXXXXXX JXXX Sdn Bhd: Validity 22/12/2023 – 21/03/2024 and PXXXXXXXXXXX SXX TXXXXXX SXXXX: 07/11/2023 – 06/02/2024) as per email dated 21/12/2023. Refer Ad Hoc Contract for CPO Transportation Services for West POM</p> <p>c) The mill trades CSPO and CSPK with its buyers among refineries and/or oleo-chemical plants. Based on agreements, transporter has no ownership of transported products and owned by buyer.</p> <p>The contract agreements specified that all transporters are required to fulfil and comply with applicable legal requirements. Refer Section 8.0 Obligation, Undertakings and Covenants Of The Transporter.</p>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Names and contact details of transporters used for the physical handling of RSPO certified oil palm products were recorded and registered in the mill supplier database system. The independent third parties involve in Mill operation is only transportation services for CPO and PK.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	There are new contractors used for the handling of certified PK. As per stated in the procedure Section 13.5 "The Mill shall inform in advance the outsourced contractors if audit is deemed necessary by Certification Bodies (CB) and ensure that the contractors engaged provide relevant access for the CBs to their respective operations, system, and any and all information, when this is announced in advance."	Complied

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		Appointment of 2 new contractors has been informed to CB on 23/02/2024 through email which is for CPO transporter.	
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 	<p>Addressed in the Sustainable Supply chain and Traceability Procedure dated January 2024 Section 5.0 Control Of Documents & Records.</p> <p>West 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"> i. All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible. ii. The retention period for maintaining the the traceability records is 3 years as stated in the January 2024 with reference number SDP/GSD/202401/SCCS, Section 5.4. 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 Sheet Calculation Report. 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). 	Complied

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		<p><u>Extension of Scope Assessment</u></p> <p>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. This extension of scope assessment is conducted so that the mill 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. This has been addressed in the latest SDPB's supply chain procedure mentioned in Indicator 3.8.5, Section 9.2 (ii), which reads:</p> <p>"The scope extension of RSPO IP Mills to include RSPO MB Supply Chain is mainly to enable the sales of products through the RSPO MB option.</p> <p>For RSPO IP Mills with RSPO MB scope extension, the mills to refer to the requirements of RSPO IP in this procedure.",</p> <p>in Section 10.8, which reads:</p> <p>"For contract allocation, declassification/downgrading shall only be in the following order:</p> <ul style="list-style-type: none"> i. RSPO: Identity Preserved → Segregation → Mass Balance → Non-certified <p>Sales of products by GT (Global Trading) will be in accordance to the certified modules of supply chain as stated in the RSPO and/or MSPO certificates.",</p> <p>and in Appendix 2, which reads:</p> <p><u>"For RSPO-certified Mills</u></p> <ul style="list-style-type: none"> i. If a mill is Identity Preserved, it shall only receive FFB from RSPO certified sources. 	
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		<p>ii. For Mills that are MB certified, they can receive FFB from both certified and non-certified estates. No separation required provided records of FFB volume processed, CPO produced and dispatched are maintained.</p> <p>*For Mills with RSPO IP and MB Supply Chains (as scope extension), refer to requirements for RSPO IP Mills."</p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Verified OER and KER as per Table 10.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>West 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>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>West Palm Oil Mill processed the FFBs from its owned supply base (West Estate) and other SDP owned plantations/estates that are certified against the RSPO P&C. However, the management of SDP decided to include Mass Balance Module into the Scope of Certification.</p> <p>As per Section 9.2 of the Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024), it stated that RSPO IP Mills to include RSPO MB Supply Chain is mainly to enable the sales of products through the RSPO MB Option.</p> <p>Despite adding the Mass Balance Module in the Scope of Certification, West Palm Oil Mill still only processes FFBs from its owned supply bases (West Estate) and other SDP owned plantations/estates that are certified against the RSPO P&C.</p>	Complied

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		<p>Furthermore, the mill strictly refrains from accepting and processing FFBs from Outside Crop Producers (OCPs), including independent smallholders, collection centers, or other third parties.</p> <p>In line with this operational framework, any RSPO Identity Preserved (IP) Certified Sustainable Palm Oil (CSPO) or RSPO IP Certified Sustainable Palm Kernel (CSPK) products are only downgraded to RSPO Mass Balance (MB) CSPO or RSPO MB CSPK after being loaded into the truck tank or truck trailer for transportation to the refinery, as determined by the Global Trading Marketing (GTM) Department.</p>	
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Registration of transactions</p> <p>i) The registration of PalmTrace is carried out by the Sime Darby's Global Trading Department, HQ. All transaction will be registered in the PalmTrace. Verified the registration of CPO Sale (Contract Number: S/CCE/2206/CPO0016; For the period of Jan 2023 to Jan 2024, there were 36 announcements for CPO and 24 announcements for PK made. All dispatches announcement was made within 3 months after shipment.</p> <p>ii) RSPO Certified Volumes Sold under as different scheme or conventional was not able to be confirmed its shipping announcement by the buyer. However, they have a system in place to remove the stocks at their respective time interval which was not at this particular audit. Refer correspondence email between Representative HQ with Global Trading Department. For West POM, there is no removal of CPO and PK has been made at Palm Trace. Issue has been raised in the internal audit dated 03/10/2023. Corrective actions have been addressed and accepted by Lead Auditor. Estate has been communicated to Global Trade Marketing dated 01/11/2023</p>	Complied

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		"We are seeking for kind assistance to remove expired contract balance of CPO and PK in palm trace".	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>In accordance with the Section 12.1 of Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia (Version 02, effective since Jan-2024) stated "Any claims regarding the use of or support of certified oil palm products shall comply with the rules of respective certification scheme (e.g., RSPO, MSPO). For RSPO, refer to the latest RSPO Rules on Market Communication and Claims"., it is confirmed that no evidence has been found to date of any incorrect or inappropriate claims made at this specific unit.</p> <p>It has been verified that the relevant outgoing paperwork correctly indicates the necessary information on product claims, including the applicable Supply Chain model and certificate number. Additionally, during the audit, it was confirmed that the mill does not utilize the RSPO corporate logo or trademark logo, ensuring compliance with the guidelines regarding their use.</p>	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.	The Sime Darby Plantation Berhad has highlighted its RSPO membership and its commitment to the objectives and principles of RSPO via Sime Darby Plantation's (SDP) 2021 Sustainability Report, which stated "SDP was a founding member of the Roundtable on Sustainable Palm Oil (RSPO) in 2004. We started working towards 100% RSPO certification across our operations in 2008, making sustainable, ethically-sourced palm oil our rallying cry."	Complied
4.2	<p>In corporate communications, a member is allowed to:</p> <p>A. display its RSPO membership status</p> <p>B. display the RSPO web address (www.rspo.org)</p>	In the Sime Darby Plantation's (SDP) 2021 Sustainability Report (https://sime-darbyplantation.com/wp-content/uploads/2022/04/SDP-SR-2021_20220429.pdf), SDP has stated their targets and progress, i.e., 100% RSPO certified estates and mills, Support	Complied

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	<p>C. state that the member supports the work of RSPO</p> <p>D. state the member's history with regard to RSPO</p> <p>E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership</p>	<p>100% scheme smallholders in Indonesia to obtain RSPO certification and Maintain RSPO certification for 100% of smallholders in PNG and Solomon Islands.</p> <p>Details of RSPO Trademark License of Sime Darby Plantation as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <p>However, in the corporate communications, no usage of RSPO Trademark License.</p>	
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	Based on the desktop studies, site visit and documentation review, it is confirmed that there is no usage of the RSPO corporate logo.	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.	Based on the desktop studies and documentation review, it is confirmed that there is no statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	Complied
4.5	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> • "We have been sourcing RSPO certified palm oil since (YEAR)." • "We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year." • "We have been RSPO certified since (YEAR)." • "We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil." • "In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified." 	Evident from the Sime Darby Plantation's (SDP) 2021 Sustainability Report (https://sime-darbyplantation.com/wp-content/uploads/2022/04/SDP-SR-2021_20220429.pdf) that the management has made statements that highlight their RSPO certification status and product-related claims in their corporate communication tools which complied with the requirement of RSPO Market Communication and Claims 2020.	Complied

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	<ul style="list-style-type: none"> “Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits.” “We are RSPO certified. Ask us for our RSPO certified products.” 		
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"> “The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR).” X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim. <p>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>	As indicated on the RSPO website (https://rspo.org/members/1-0008-04-000-00/), Sime Darby Plantation Berhad has been an RSPO member since 07 September 2004, holding RSPO Membership No. 1-0008-04-000-00. Therefore, this specific indicator is deemed Not Applicable for this UoC.	Not Applicable
Product-specific communications			
5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters,	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	Complied

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	displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	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 (https://www.sdquthrie.com/wp-content/uploads/2022/04/SDP-SR-2021_20220429.pdf).	
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.	<p>Details of RSPO Trademark License of Sime Darby Plantation as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <p>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.</p>	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 Trademark licence number, the following conditions shall be met as shown below	As West 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

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	<ul style="list-style-type: none"> RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. Both parties shall inform their certification body in writing about the agreement. The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 		
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	As West 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
5.2 Off pack claims			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	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 (https://www.sdguthrie.com/wp-content/uploads/2022/04/SDP-SR-2021_20220429.pdf).	Complied

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5.2.2	<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>West POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</p> <p>CPO – IP</p> <p>Sample 1</p> <ul style="list-style-type: none"> a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; West POM c) The loading or shipment / delivery date; 08/12/2023 d) The date on which the documents were issued; 08/12/2023 e) RSPO Certificate Number: RSPO 543594 f) A description of the product: CPO IP g) The quantity of the products delivered; 40.15 Mt h) Any related transport documentation; NDBXXXX i) A unique identification number: 024XXX, Contract: S/PSD/XXXX/CPOXXXXX <p>Sample 2</p> <ul style="list-style-type: none"> a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; West POM c) The loading or shipment / delivery date; 28/11/2023 d) The date on which the documents were issued; 28/11/2023 e) RSPO Certificate Number: RSPO 543594 f) A description of the product: CPO IP g) The quantity of the products delivered; 40.11 Mt h) Any related transport documentation; BLHXXXX 	Complied
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		<p>i) A unique identification number: 024XXX, Contract: S/PSD/XXXX/CPOXXXXX</p> <p>PK – IP</p> <p>Sample 1</p> <p>a) The name and address of the buyer; BUYERXXXXXX</p> <p>b) The name and address of the seller; West POM</p> <p>c) The loading or shipment / delivery date; 20/10/2023</p> <p>d) The date on which the documents were issued; 20/10/2023</p> <p>e) RSPO Certificate Number: RSPO 543594</p> <p>f) A description of the product: PK IP</p> <p>g) The quantity of the products delivered; 17.76 Mt</p> <p>h) Any related transport documentation; BKRXXXX</p> <p>i) A Unique identification number: 024XXX, Contract: S/PSD/XXXX/PKXXXXX</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"> 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 	<p>As West POM is an Oil Mill, which only processes FFBs and produces CPO and PK, this particular indicator is deemed not applicable to this UoC.</p>	Not Applicable

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	<p>the distributor or wholesaler, with specific evidence either through on pack claims or documentation.</p> <ul style="list-style-type: none"> If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 		
5.3 On pack claims			
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 Sime Darby Plantation Berhad as below:</p> <ul style="list-style-type: none"> License No.: RSPO-1106024 License Start Date: 23/06/2023 License Expiration: 22/06/2025 <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
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> RSPO IP/SG CERTIFIED* Contains RSPO IP/SG palm oil* Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>Details of RSPO Trademark License of Sime Darby Plantation Berhad as below:</p> <ul style="list-style-type: none"> License No.: RSPO-1106024 License Start Date: 23/06/2023 License Expiration: 22/06/2025 <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"> RSPO MIXED* 	<p>Details of RSPO Trademark License of Sime Darby Plantation Berhad as below:</p>	Complied

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	<ul style="list-style-type: none"> • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <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>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>Details of RSPO Trademark License of Sime Darby Plantation Berhad as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <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>D) For Products covered with Book and Claim (B&C):</p> <ul style="list-style-type: none"> • RSPO CREDITS* • Supports the production of RSPO certified palm oil* • Contains palm oil covered by the purchase of RSPO Credits* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>Details of RSPO Trademark License of Sime Darby Plantation Berhad as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <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	On pack claims shall not include information about the claimant's RSPO membership status.	Details of RSPO Trademark License of Sime Darby Plantation Berhad as below:	Complied

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		<ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <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>	
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	<p>Details of RSPO Trademark License of Sime Darby Plantation Berhad as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <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
5.3.5	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 Sime Darby Plantation Berhad as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <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

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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 Sime Darby Plantation Berhad as below:</p> <ul style="list-style-type: none"> • License No.: RSPO-1106024 • License Start Date: 23/06/2023 • License Expiration: 22/06/2025 <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
MODULE A – IDENTITY PRESERVED			
	95% of the palm oil content must be RSPO IP certified.	CPO produce for IP certified containing 100% oil palm content.	Complied
	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.	CPO produce for IP certified containing 100% oil palm content.	Complied
Messaging			
	<p>Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements:</p> <ul style="list-style-type: none"> • The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org • RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain. www.rspo.org • Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. www.rspo.org 	As at to date, no RSPO trademark used by the mill.	Complied

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	<ul style="list-style-type: none"> The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. www.rspo.org 		
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> RSPO Trademark that includes the tag "CERTIFIED"; or RSPO Trademark that includes the tag "This product contains certified sustainable palm oil". 	As at to date, no RSPO trademark used by the mill.	Complied
MODULE B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			
	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
Messaging			
	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. The volume of [palm oil products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. 	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

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Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag "MIXED" on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". 	<p>Details of RSPO Trademark License of Sime Darby Plantation as below:</p> <ul style="list-style-type: none"> License No.: RSPO-1106024 License Start Date: 23/06/2023 License Expiration: 22/06/2025 <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
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has established human right charter as commitment to respect human right updated on June 2023. Commitment of Sime Darby Plantations has been outline in clause 3.2 which included but not limited to equal opportunities, respecting freedom of association, combating modern slavery, enhancing health and safety, protecting the right of children, and eliminating violence and harassment. Other than that, Sime Darby Plantation Berhad has been established other policy regards to human right defender in the document "Policy on the Protection of Human Rights Defenders (HRDs)" updated 2020 which clearly stated in clause 3.2 that in the course of their engagement with SDP shall be protected from violence, threats and all forms of retaliation.</p> <p>Communication of the policy has been done through the stakeholders consultations that has been conducted on 23/11/2023 with attendance for various stakeholders for all operating units</p>	Complied

		under SOU9- West POM. While for workers, it has been communicated during the morning muster call. During the interview, all the workers able to demonstrate their understanding on the policy.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	As per verification through interview and documentation, there is evidence that all operating units under SOU 09 West POM did instigate violence or use any form or harassment There is no cases of harassment included sexual harassment, bullying and abuse has been reported and identified by auditor during the audit.	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Grievance procedure has been established Grievance Response Standard Operating Procedure updated on 18/07/2022 where the management of has established several methods to make any complaint such as workers representative meeting (social dialogue on monthly basis), gender committee meeting every 2 months, online platform (suara kami, whistleblowing) and also through email that will be handle by Grievance units. The procedure also classified the cases for complainer that required to maintain anonymous or not. The awareness on surrounding communities for complaints or suggestion have been given during "Mesyuarat Bersama Pihak Berkepentingan" dated 23/11/2023 included village head, school representative, OCP supplier, contractor and others. The estate management has also conducted the training for employees and stakeholders respectively. While for workers, it has been conducted during the morning muster call.	OFI

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		<p>OFI</p> <p>Investigation of any complaint/grievance received can be further improved by ensuring independent investigation implement.</p> <ol style="list-style-type: none"> 1. Complaint received through "Suara Kami" channel on 05/07/2023 from one worker that he has been terminated without any proper justification. 2. Workers went back to origin countries on 05/03/2023 and has been approved for extension of leave until June 2023. However, the worker went back to West Estate in July 2023 after the management has reported as abscond cases. 3. Before the worker leave his hometown, he met the VMO for medical checkup and the identified that he suffers for chronic pharyngitis. (Upper respiratory infection). This has been confirmed by auditor base on the outpatient report and interview with VMO. 4. The worker also has provided medical report from Iqcra Hospital and Diagnostic Centre date 29/04/2023 which also mentioned that the worker suffers on Chronic Pharyngitis <p>The Regional Human Resources Department investigated the complaint; however, the inquiry failed to consider the health report of the workers.</p>	
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>There is evidence that the procedure has been made available and in place where their procedure has been communicated to all workers during morning mustercall on weekly basis. Other than that, it has been posted at the housing quarters, muster round and office. QR for suara kami has been pasted at the safety helmet for</p>	Complied

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		each worker. As per interview, workers and stakeholders can demonstrate their understanding on procedures. There is no illiterate parties has been identified for each operating units.	
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 -	There is evidence that any grievance that has been raised by workers/stakeholders has been responded in timely manner. As per interview with the workers, the management of each operating units is responsive for all complaint/grievance receive. Total 8 grievances have been received for SOU 09- West POM Operating Units which has been responded within 3 months which some of the cases where anonymous and required investigation.	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 -	Sime Darby Plantation Berhad has implemented Grievances Response Standard Operating Procedure dated 18/07/2022 documented the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	Sime Darby Plantation Berhad is deeply committed to promoting sustainable development in local communities through extensive consultation and addressing social and environmental issues. The company's contributions are diverse and aimed at fostering social and environmental benefits.	Complied

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		<p>The company's sustainable development initiatives, including consultations with local communities, are prominently showcased on its website. For example, projects highlighted on the Yayasan Sime Darby's website, such as those detailed at https://www.yayasansimedarby.com/our-projects/community-health, exemplify efforts to address community health needs and enhance well-being.</p> <p>Specific contributions to community development initiatives by the uoC, derived from consultations with local communities, include:</p> <ol style="list-style-type: none"> (1) Facilitating Hindu Worship Practices: Supporting the affairs of Hindu workers to worship at the temple by providing clean water. (2) Support for School Activities: Contributing cash or equipment for various school events, enriching educational opportunities for local students. (3) Community Water Provision: Contributing to providing water access to local communities, addressing essential needs for clean water. (4) Support for Research Initiatives: Assisting final year students at UiTM with research matters and thesis preparation, nurturing academic excellence and knowledge dissemination. <p>These contributions underscore Sime Darby Plantation Berhad's dedication to community development and reflect tangible outcomes resulting from consultations with local communities. By actively engaging with stakeholders and addressing identified needs, the company continues to make meaningful contributions to local sustainable development.</p>	
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		As per verification, principal of Sekolah Menengah Kebangsaan Pulau Carey has been communicated on the procedure to request any contribution through online system for monetary and through consultation and communication procedure during the stakeholders. The management noted with the respond and refresher briefing will be conducted to ensure that good understanding on the process															
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.																	
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>There is no changes compare to last year where SOU 09 West POM and West Estate able to demonstrate the evidence of legal ownership if its lands through possession of land titles.</p> <p>The estate has a list summary of 20 land titles with 11,473.8939 ha which have the information about names of lease, hectare, terms & conditions, lease period and grant numbers.</p> <p>Copies of the land titles were available at the estate's offices while the original were kept at headquarter.</p> <table border="1"> <thead> <tr> <th>Estate</th><th>Land title</th><th>Land use type</th><th>Tenure</th></tr> </thead> <tbody> <tr> <td rowspan="3">West Estate</td><td>Land title No: 3xxx Lot No: 9xx Area: 5,366 ha Issued: 27/09/2017</td><td>Agriculture</td><td>Freehold Perpetuity Ownership</td></tr> <tr> <td>Land title No: 3xxx Lot No: 1xxx Area: 99.55 ha Issued: 17/10/2017</td><td>Agriculture</td><td>Freehold Perpetuity Ownership</td></tr> <tr> <td>Land title No: 3xxx</td><td>Agriculture</td><td>Freehold</td></tr> </tbody> </table>	Estate	Land title	Land use type	Tenure	West Estate	Land title No: 3xxx Lot No: 9xx Area: 5,366 ha Issued: 27/09/2017	Agriculture	Freehold Perpetuity Ownership	Land title No: 3xxx Lot No: 1xxx Area: 99.55 ha Issued: 17/10/2017	Agriculture	Freehold Perpetuity Ownership	Land title No: 3xxx	Agriculture	Freehold	Complied
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			Lot No: 1xxx Area: 371.9 ha Issued: 17/10/2017		Perpetuity Ownership	
			Land title No: 3xxx Lot No:1xxx Area: 244.4 ha Issued: 17/10/2017	Agriculture	Freehold Perpetuity Ownership	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	Sime Darby Plantation Berhad (SDPB) developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new development. No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Onsite visit to boundary area, sighted boundary stone and trenches were available to demarcate the boundary of land. Onsite interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.				Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. The management conduct an annual face to face session with external stakeholder – Stakeholder meeting was conducted on 23/11/2023 and the minutes of the "Minit Mesyuarat Bersama Pihak Berkepentingan" are available for consultation and discussed issues related to the affected group includes land.It was				Complied

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		verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. The management conduct an annual face to face session with external stakeholder – Stakeholder meeting was conducted on 23/11/2023 and the minutes of the "Minit Mesyuarat Bersama Pihak Berkepentingan" are available for consultation and discussed issues related to the affected group includes land.It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. The management conduct an annual face to face session with external stakeholder – Stakeholder meeting was conducted on 23/11/2023 and the minutes of the "Minit Mesyuarat Bersama Pihak Berkepentingan" are available for consultation and discussed issues related to the affected group includes land.It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. The management conduct an annual face to face session with external stakeholder – Stakeholder meeting was conducted on 23/11/2023 and the minutes of the "Minit Mesyuarat Bersama Pihak Berkepentingan" are available for consultation and discussed issues related to the affected group includes land.It was	Complied

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		verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. The management conduct an annual face to face session with external stakeholder – Stakeholder meeting was conducted on 23/11/2023 and the minutes of the "Minit Mesyuarat Bersama Pihak Berkepentingan" are available for consultation and discussed issues related to the affected group includes land. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. The management conduct an annual face to face session with external stakeholder – Stakeholder meeting was conducted on 23/11/2023 and the minutes of the "Minit Mesyuarat Bersama Pihak Berkepentingan" are available for consultation and discussed issues related to the affected group includes land. It was verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. The management conduct an annual face to face session with external stakeholder – Stakeholder meeting was conducted on 23/11/2023 and the minutes of the "Minit Mesyuarat Bersama Pihak Berkepentingan" are available for consultation and discussed issues related to the affected group includes land. It was	Complied

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		verified through the land titles and interviewed with stakeholder confirmed that there is no any land dispute reported.															
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.																	
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	<p>There is no changes compare to last year where SOU 09 West POM and West Estate able to demonstrate the evidence of legal ownership if its lands through possession of land titles.</p> <p>The estate has a list summary of 20 land titles with 11,473.8939 ha which have the information about names of lease, hectare, terms & conditions, lease period and grant numbers.</p> <p>Copies of the land titles were available at the estate's offices while the original were kept at headquarter.</p> <table border="1"> <thead> <tr> <th>Estate</th><th>Land title</th><th>Land use type</th><th>Tenure</th></tr> </thead> <tbody> <tr> <td rowspan="3">West Estate</td><td>Land title No: 3xxx Lot No: 9xx Area: 5,366 ha Issued: 27/09/2017</td><td>Agriculture</td><td>Freehold Perpetuity Ownership</td></tr> <tr> <td>Land title No: 3xxx Lot No: 1xxx Area: 99.55 ha Issued: 17/10/2017</td><td>Agriculture</td><td>Freehold Perpetuity Ownership</td></tr> <tr> <td>Land title No: 3xxx Lot No: 1xxx Area: 371.9 ha Issued: 17/10/2017</td><td>Agriculture</td><td>Freehold Perpetuity Ownership</td></tr> </tbody> </table>	Estate	Land title	Land use type	Tenure	West Estate	Land title No: 3xxx Lot No: 9xx Area: 5,366 ha Issued: 27/09/2017	Agriculture	Freehold Perpetuity Ownership	Land title No: 3xxx Lot No: 1xxx Area: 99.55 ha Issued: 17/10/2017	Agriculture	Freehold Perpetuity Ownership	Land title No: 3xxx Lot No: 1xxx Area: 371.9 ha Issued: 17/10/2017	Agriculture	Freehold Perpetuity Ownership	Complied
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			Land title No: 3xxx Lot No:1xxx Area: 244.4 ha Issued: 17/10/2017	Agriculture	Freehold Perpetuity Ownership	
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting and issues of customary land occurred in all estate under SOU 09-West POM that requires FPIC process since the last audit.</p> <p>It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images, that there was no new development all estate under SOU 09-West POM in the past recent years.</p> <p>The estate's land statement was verified to have no additional changes to the planted area. This was cross checked against the previous year's land statements and MPOB License</p>				Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurred in all estate under SOU 09-West POM that requires FPIC process since the last audit.</p> <p>It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images, that there was no new development all estate under SOU 09-West POM in the past recent years.</p> <p>The estate's land statement was verified to have no additional changes to the planted area. This was cross checked against the previous year's land statements and MPOB License</p>				Complied

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4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurred in all estate under SOU 09-West POM that requires FPIC process since the last audit.</p> <p>It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images, that there was no new development all estate under SOU 09-West POM in the past recent years.</p> <p>The estate's land statement was verified to have no additional changes to the planted area. This was cross checked against the previous year's land statements and MPOB License</p>	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurred in all estate under SOU 09-West POM that requires FPIC process since the last audit.</p> <p>It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images, that there was no new development all estate under SOU 09-West POM in the past recent years.</p> <p>The estate's land statement was verified to have no additional changes to the planted area. This was cross checked against the previous year's land statements and MPOB License</p>	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>No new planting and issues of customary land occurred in all estate under SOU 09-West POM that requires FPIC process since the last audit.</p> <p>It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images, that there was no new</p>	Complied

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		<p>development all estate under SOU 09-West POM in the past recent years.</p> <p>The estate's land statement was verified to have no additional changes to the planted area. This was cross checked against the previous year's land statements and MPOB License</p>	
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>No new planting and issues of customary land occurred in all estate under SOU 09-West POM that requires FPIC process since the last audit.</p> <p>It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images, that there was no new development all estate under SOU 09-West POM in the past recent years.</p> <p>The estate's land statement was verified to have no additional changes to the planted area. This was cross checked against the previous year's land statements and MPOB License</p>	Complied
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting and issues of customary land occurred in all estate under SOU 09-West POM that requires FPIC process since the last audit.</p> <p>It was verified via Global Risk Assessment Services System (GRASS), a system that monitors new development and changes on changes of landscape via satellite images, that there was no new development all estate under SOU 09-West POM in the past recent years.</p> <p>The estate's land statement was verified to have no additional changes to the planted area. This was cross checked against the previous year's land statements and MPOB License</p>	Complied

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Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	SDPB developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new development. In case of any dispute, Flowchart and Procedures on Handling Land Disputes dated 1/11/2008 will be used to handle the process. Compensation procedure has been clearly stated in the same procedure as well.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	SDPB developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new development. In case of any dispute, Flowchart and Procedures on Handling Land Disputes dated 1/11/2008 will be used to handle the process. Compensation procedure has been clearly stated in the same procedure as well.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	SOU-09 West POM does not have scheme smallholders within its certification unit. Since then the indicator is not applicable.	Not Applicable
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	There is no customary right in SOU-09 West POM as the land is belong to Sime Darby Plantations Berhad.	Not Applicable
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			

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4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	SDPB developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new development. In case of any dispute, Flowchart and Procedures on Handling Land Disputes dated 1/11/2008 will be used to handle the process. Compensation procedure has been clearly stated in the same procedure as well.	Complied
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	SDPB developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new development. In case of any dispute, Flowchart and Procedures on Handling Land Disputes dated 1/11/2008 will be used to handle the process. Compensation procedure has been clearly stated in the same procedure as well.	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	There is no customary right in SOU-09 West POM as the land is belong to Sime Darby Plantations Berhad.	Not Applicable
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
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>	There is no customary right in SOU-09 West POM as the land is belong to Sime Darby Plantations Berhad. It has been confirmed through interview with local communities. Therefore, this is not applicable.	Not Applicable

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4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	There is no customary right in SOU-09 West POM as the land is belong to Sime Darby Plantations Berhad. It has been confirmed through interview with local communities. Therefore, this is not applicable.	Not Applicable
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	There is no customary right in SOU-09 West POM as the land is belong to Sime Darby Plantations Berhad. It has been confirmed through interview with local communities. Therefore, this is not applicable	Not Applicable
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p>	There is no customary right in SOU-09 West POM as the land is belong to Sime Darby Plantations Berhad. It has been confirmed through interview with local communities. Therefore, this is not applicable.	Not Applicable
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	West POM operate under IP model and only received FFB from certified operating units which is West Estate and estates under East POM, Bukit Kerayong POM and Tennamaram POM	Not Applicable
5.1.2	<p>(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p>	West POM operate under IP model and only received FFB from certified operating units which is West Estate and estates under East POM, Bukit Kerayong POM and Tennamaram POM	Not Applicable

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5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	West POM operate under IP model and only received FFB from certified operating units which is West Estate and estates under East POM, Bukit Kerayong POM and Tennamaram POM	Not Applicable
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	West POM operate under IP model and only received FFB from certified operating units which is West Estate and estates under East POM, Bukit Kerayong POM and Tennamaram POM	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	West POM operate under IP model and only received FFB from certified operating units which is West Estate and estates under East POM, Bukit Kerayong POM and Tennamaram POM	Not Applicable
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	West POM operate under IP model and only received FFB from certified operating units which is West Estate and estates under East POM, Bukit Kerayong POM and Tennamaram POM	Not Applicable
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 -	The management has conducted the regular inspection for the weighbridge. Details of the inspection is as following Calibration Date: 31/10/2023	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	West POM operate under IP model and only received FFB from certified operating units which is West Estate and estates under East POM, Bukit Kerayong POM and Tennamaram POM	Complied

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5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	A grievance mechanism has been established, as outlined in the Grievance Response Standard Operating Procedure dated 18/07/2022.	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	<p>The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	West POM did not received any FFB from the schemed and independent smallholders. However consultation are made normally through meeting where smallholders were invited to attend the stakeholder meeting for briefing on matters related to MSPO and RSPO certifications particularly on crop quality and field standards. Latest stakeholders consultations has been on 23/11/2023 with attendance of local communities which also planted oil palm.	Complied
5.2.2	<p>The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).</p> <p>- Minor compliance -</p>	West POM did not received any FFB from the schemed and independent smallholders. However consultation are made normally through meeting where smallholders were invited to attend the stakeholder meeting for briefing on matters related to MSPO and RSPO certifications particularly on crop quality and field standards. Latest stakeholders consultations has been on 23/11/2023 with attendance of local communities which also planted oil palm.	Complied
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	West POM did not received any FFB from the schemed and independent smallholders. However consultation are made normally through meeting where smallholders were invited to attend the stakeholder meeting for briefing on matters related to MSPO and RSPO certifications particularly on crop quality and field standards. Latest stakeholders consultations has been on 23/11/2023 with attendance of local communities which also planted oil palm.	Complied
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p>	West POM did not received any FFB from the schemed and independent smallholders. However consultation are made normally	Complied

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	- Critical (Major) compliance -	through meeting where smallholders were invited to attend the stakeholder meeting for briefing on matters related to MSPO and RSPO certifications particularly on crop quality and field standards. Latest stakeholders consultations has been on 23/11/2023 with attendance of local communities which also planted oil palm.	
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	West POM did not received any FFB from the schemed and independent smallholders. However consultation are made normally through meeting where smallholders were invited to attend the stakeholder meeting for briefing on matters related to MSPO and RSPO certifications particularly on crop quality and field standards. Latest stakeholders consultations has been on 23/11/2023 with attendance of local communities which also planted oil palm.	Complied
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	Documented in the Human Right Charter revised in year 2020 which clearly stated that Sime Darby Plantation Berhad (SDPB) will not tolerate any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. As per verification for each operating units, there is evidence that there is no discrimination has been practices. Foreign workers from different origin, different gender has been treated equally and has been given same opportunities. This has been verified by the auditor through interview with the workers from different origin, races, gender.	Complied
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. - Critical (Major) compliance -	There is evidence that there are no parties has been discriminated by the management where it has been confirmed through interview, site visit and records review. Sample has been taken for women workers where they have been treated equally as other workers	Complied

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		where there has been paid equally with other workers which work as same job scope and entitle with the same benefits. All foreign workers have been allocated at the same housing compound and received same benefits regardless of the origin. There are no recruitment fees has been charged to all foreign workers that has been recruited in year 2023. It has been confirmed through interview with the new recruited workers.	
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	There is evidence that operating units has demonstrate that recruitment base on capabilities and qualities which has been verified during the interview by the operating units and for foreign workers at the origin countries. Sample of 12 workers has been taken from different origin countries, races and gender and has been verified based on interview, and documentation such as medical checkup and interview records. All workers has right for training and has been verified based on the training records that has been conducted either to all workers or based on job scope. There is no promotion is both operating units.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	There is no pregnancy test has been done in all operating units. It has been confirmed through interview with Hospital Assistant and female workers. If there is any cases of delaying on menstrual, hospital assistant will advised the female workers to conducted test to nearest government health clinic.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	The management established Term of Reference for Gender Representatives and Gender Committees on March 2021. The meeting was conducted every 3 months.. Verify from the interview with the gender committee representative, no issues of sexual harassment have been and confirmed. Verify from the interview with the gender committee representative, no issues of sexual harassment have been and confirmed.	Complied

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6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	There is evidence that all workers has been paid according to minimum wages order 2022 and as per collective agreement with MAPA NUPW. It has been confirmed with through interview with sample workers and pays documentation such as pay slips, punch card for Month March'23, June'23 and September'23. Sample has been taken for piece rate work where all workers has been paid equally according to hectarage, tonnage, or bags.	Complied
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	Collective agreement between Sime Darby Plantations Berhad and national union of plantation workers (NUPW) for Palm Oil Mill Employees, 2020 registered 09/03/2020 valid until December 2022 reference number COG. NO: 057/2020. Other than all operating units complies with Minimum Wage Order 2022 at rate RM1500/months, RM57.69/day or RM7.21/hour. New collective agreement is still pending for approval and still under negotiation process in the industrial. Since then, current collective agreement is applicable.	Complied
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members. - Critical (Major) compliance -	Payment details and employment terms are clearly outlined and formally recorded in employment contracts provided to all employees. These contracts encompass various aspects, such as the employment duration, working hours, overtime policies, annual and medical leave entitlements, public holiday arrangements, mutual termination provisions, maternity benefits, and more. Importantly, these terms are in strict adherence to the Employment Act of 1955, the Minimum Wages Order of 2020, the SOCSO Act of 1969, the EPF Act of 1991, the EIS Act of 2017, and the MAPA/NUPW agreement.	Complied

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		<p>Additionally, payroll documents, specifically payslips, provide accurate and comprehensive information regarding compensation for all labor performed. This encompasses individuals receiving daily-rated wages, piece-rated wages, payments for any overtime work, and remuneration for public holidays. Furthermore, our examination of sampled payslips confirms that all wages were disbursed in full compliance with the applicable national legal requirements. Salary deductions and overtime payments align with the stipulations of the relevant laws, including SOCSO, EPF, EIS, and are also in accordance with Labor Office permits.</p> <p>Stated in the employment contract working hours, deduction, overtime and leave entitlement. Mentioned in the employment contract that entitlement of leave is depending on the length of service. For workers less than 2 years services, they are entitled for 14 days of sick leave and 8 days of annual leave. Highlighted in the contract reasons for dismissal, period of notice and other legal labour requirements.</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Sample of workers has been taken by the auditor for each operating units to verify the compliance of legal requirement and as per employment contract. Verification has been done through pay slips, employment contract, punch cards, check roll book and confirmation through interview with sample workers where there is evidence that the management for each operating units complies with collective agreement requirement and employment contract requirement as per stipulated in the indicator 6.2.2</p>	Complied
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on</p>	<p>The essential services and amenities available to workers in the company-provided housing include electricity, water, and domestic waste disposal. The government supplies electricity, and the cost is deducted from the employees' salaries. Regarding water, the</p>	Complied

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	<p>Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>company offers up to 35 gallons per employee per day at no cost, and any additional usage is subject to charges based on prevailing domestic rates. The budget for housing repairs, sanitation, garden maintenance, as well as CAPEX and OPEX across all operating units has been reviewed.</p> <p>The records for weekly on-site inspections by the Medical Assistant (estate) and QA (mill) are examined on a fortnightly basis in accordance with the Workers Minimum Housing and Amenities Regulation 2020.</p> <p>Workers Housing Management Procedure and 'OilPalmPal' Digital Housing Complaint System (OPP DHCS). Inter-office mail (Ref. No: UM/HSE/013/11/2021), dated 26/11/2021 from CEO Upstream Malaysia. General house rule is written under "Peraturan Umum Kompleks Perumahan Pekerja"</p> <p>For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2 people per room. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utensils).</p>	
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 are sundry shops located in the estates compound and the estates are nearby to the nearest town. The workers can easily access to adequate, sufficient and affordable foods and goods. Price of goods were displayed at the sundry shops. Workers' interview confirmed that they can easily purchase foods at the nearest shop or choose to go nearest town away from the estate by using their transport until the main guard post and public transport to the nearest town.</p>	Complied

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6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</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><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>Sime Darby Plantation Berhad – SOU 09 West POM has provided the decent living wage for both local and foreign workers based on PREVAILING WAGES assessment. It includes wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc. It has been verified by auditor base on the sample payslips for each operating units showed that the salary received complied with the minimum wage order 2020 and 2022</p> <p>The management conducted Prevailing Wage Assessment based on check-roll worker for period 2023 and published in January 2024</p>	Complied
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	<p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>As per verification, for West Estate, there are 4 contractors has been appointed which mainly for FFB and EFB transport. While for West POM, there is only 1 contractors which is for RO water project. All other core works has performed by permanent workers that has been recruited by SDPB.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>There is no changes compare to last year where SDPB adopt the same Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 with no changes on the policy which is includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ol style="list-style-type: none"> 1. Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. 2. Respecting Freedom of Association: We respect the rights of 	Complied

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		<p>employees to join and form organisations of their own choice and to bargain collectively.</p> <p>3. Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively.</p> <p>During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union. Sighted list of workers that already registered as NUPW member and records memberships payments.</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Minutes meeting has been conduction monthly basis which under social dialogue which the workers representative has been elected by the workers. Evidence of minute meeting for West POM sighted for meeting 16/02/2024, 18/01/2024 and 27/12/2023. The minutes has been documented in Bahasa Malaysia and has been classified as publicly available.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Election of workers has been done through Whatapps which has been handle by Regional support services and will be calculate and summarized. The outcome will be submitted social welfare services and appointment letter will be provided. There is evidence representative from different origin countries, gender has been elected for both operating units.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>There is no changes compare to last year where SDPB adopted Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 with no changes on the policy which is includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p>	Complied

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		<p>1. Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</p> <p>2. Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</p> <p>3. Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations.</p> <p>4. Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the wellbeing of our communities.</p> <p>5. Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognize that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use.</p> <p>6. Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalized groups, persons of different abilities and refugees.</p> <p>7. Protecting the Rights of Children: We seek to promote the wellbeing of children, and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labor and child pornography.</p> <p>8. Review of workers master list, interview and site visit confirmed that there is no workers below than 18 years old</p>	
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above	As per verification through sample of workers from different categories which are origin countries, gender, types of workers found that there is no workers below than minimum ages has been	Complied

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	company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance -	recruited. It has been verify base on master list, personal file and interview by the workers itself. Procedure for age screening has been established for both migrant and local workers in the recruitment procedure.	
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	There is compliance to Human Right Charter which clearly stated the management commitment in clause 3.3 Respect and Uphold Children's Rights 3.3.1 Eradicating child labour in our supply chain. SDPB will not employ anyone under the age of 18 years. Review of workers master list, interview and site visit confirmed that there is no workers below than 18 years old	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	Communication of the policy has been done through the stakeholders consultations that that has been conducted on 23/11/2023 with attendance fo various stakeholders for all operating units under SOU 09-West POM.It has been further confirmed through interview with the stakeholders	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	There are no changes compare to last year where Sime Darby Plantations Berhad adopt the Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below: Stated in the policy that the management committed to respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to: 1. Eliminating Violence and Sexual Harassment: 2. Eradicating any form of Exploitation There are no cases of any harassment that has been identified and	Complied

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		<p>happen in all operating units which has been confirmed based on interview with the workers.</p> <p>Communication of the policy sighted based on briefing records for each operating units and further verified based on interview with the stakeholders and workers which can demonstrate their understanding on the policy that has been established.</p>	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Stated in the human right charter year 2020, commitment of Sime Darby Plantation Berhad in protecting reproductive right and has been clearly outline in clause 3.2.5. There is evidence that the policy has been implemented where there is no restriction by the management for pregnancy and there is no pregnant/breastfeeding women handling with chemical. It has been further confirmed through interview with the female workers.</p> <p>Communication of the policy sighted based on briefing records for each operating units and further verified base on interview with the stakeholders and workers which can demonstrate their understanding on the policy that has been established.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>As per verification, there is evidence that all the new mother has been assessed and consulted and there is no special request has been raised by the new mother, expect time break for breast feeding and hospital appointment. It has been confirmed through interview with sample of new mother.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has implemented Grievances Response Standard Operating Procedure dated 18/07/2022. The complaints and grievances are open to effected parties including internal and external stakeholders. The time frame to deal with internal and external communications has been detailed in the</p>	Complied

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		<p>Section 2.2. Flow chart procedure and 3.3 The time scale of investigation.</p> <p>Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in https://www.simedarby.com/operating-responsibly/whistleblowing</p> <p>Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p> <p>Interview conducted on-site with sampled internal stakeholders among all workforce confirmed that the information on grievance mechanism, which respects anonymity and protects complainants where requested, is established, and communicated to them.</p> <p>No grievance issues that require the implementation of the mechanism occurs in all operating units within SOU 09-West POM and West Estate since the last audit.</p>	
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign 	<p>Based on interviews with the workers, and observations made, the following were verified:</p> <p>a. Retention of documents: All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. Some Indonesian workers has been interviewed and confirmed that passport has been kept by the workers itself. It has been confirmed during site visit to line site where verification passport has been kept at their house.</p>	Complied

	<ul style="list-style-type: none"> • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>b. Charging of recruitment fee: Workers are not charged any recruitment fees. Interviews conducted with workers also confirmed that they have not been charged any recruitment fees.</p> <p>c. Involuntary overtime: Based on interviews conducted with the workers, all overtime work was carried out on a voluntary basis. Workers are free to decline any offers for overtime work. Sighted written consent from workers to work overtime for West POM and estates.</p> <p>d. Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. This was confirmed during interviews with workers. There is no term and condition for any resignation and the flight tickets will bear by the operating units.</p> <p>e. Debt bondage: There is no evidence of any incidence of debt bondage. It has been verified based on sample of pay slips where there is no deduction of salary for debt. Further verification has been done through interview where there is no loan/borrowing money has been given by the management to the workers. There is also no recruitment fee has been charged to the workers hence confirmed that there is debt bondage implement.</p> <p>f. 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.</p>	
6.6.2	(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	There are migrant workers has been recruited from India, Indonesia and Bangladesh to work in SOU 09-West POM. As a commitment to	Complied

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	- Critical (Major) compliance -	<p>manage migrant workers in a good manner and compliance to the requirement Sime Darby Plantations Berhad has adopted Sime Darby's Human Rights Charter, wherein they have made the following commitments:</p> <ul style="list-style-type: none"> a. Ensuring equal opportunities for all. b. Respecting the freedom of association. c. Eradicating any manifestations of exploitation. d. Ensuring the provision of favorable working conditions. e. Enhancing safety and health measures. <p>As per verification, there is evidence that the policy has been implemented where each process of recruitment has been done such as signing employment contract, interview and consultation with migrant workers at origin countries and One Stop Centre. As per interview, it has been confirmed that all facilities and benefits has been provided equally for all foreign workers. Passport has been kept by the workers itself. There is no evidence of contract substitution where all migrant workers have been explained the content of the employment contract at the origin countries. It has been confirmed through interview with the workers itself.</p>	
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate/Mill Manager. The mill and estates manager has been appointed as person responsible for safety and health cum chairman for safety and health as per Appointment letter dated 01/11/2021 by Regional Chief Executive Officer. All correspondence were sighted and verified. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the</p>	Complied

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		<p>OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report, workplace inspection, and training. Concerns on issue related health, safety and welfare were discussed at these meetings and recorded. The OSH Committee meeting for Estate was conducted on quarterly basis. Reviewed the latest minutes meeting FY 2023 as follows:</p> <table><tr><td>OSH Meeting 2023</td><td>West Estate</td><td>West POM</td></tr><tr><td>1st Quarter</td><td>28/03/2023</td><td>14/03/2023</td></tr><tr><td>2nd Quarter</td><td>26/06/2023</td><td>21/06/2023</td></tr><tr><td>3rd Quarter</td><td>26/09/2023</td><td>20/09/2023</td></tr><tr><td>4th Quarter</td><td>22/12/2023</td><td>14/12/2023</td></tr></table> <p>Workplace inspections are made prior to the ESH meeting. Latest workplace inspection was conducted on the month of Dec 2023 and January 2024.</p>	OSH Meeting 2023	West Estate	West POM	1 st Quarter	28/03/2023	14/03/2023	2 nd Quarter	26/06/2023	21/06/2023	3 rd Quarter	26/09/2023	20/09/2023	4 th Quarter	22/12/2023	14/12/2023	
OSH Meeting 2023	West Estate	West POM																
1 st Quarter	28/03/2023	14/03/2023																
2 nd Quarter	26/06/2023	21/06/2023																
3 rd Quarter	26/09/2023	20/09/2023																
4 th Quarter	22/12/2023	14/12/2023																
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 & Response Procedures dated 17/11/2021 with reference number UM/HSE/SP/02. Procedures were available in the estates and mills to address potential emergencies such as Flood, Fire, Chemical Spillage, Poisoning, Earthquake/landslide, Accidents, Storm, and Wild/ Poisonous Animal Attacks. The plans have been posted at notice boards in the mills and estates and communicated to the workers. Emergency contact numbers have been posted at the notice boards and provided to the workers as well. Interview with the workers such as mandores and store attendants indicated that the workers are</p>	<p>Non-compliance</p>															

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		<p>aware on the available emergency response plans. Trainings were conducted in the mill and estates to provide awareness to the workers on emergency responses. The trainings were sighted as below.</p> <table><tr><td>Estate/ Mill</td><td>ERP Training date</td></tr><tr><td>West POM</td><td>31/03/2023</td></tr><tr><td>West Estate</td><td>21/07/2023</td></tr></table> <p>First aiders were present in the operating units. They have been trained and obtained certificates as the PIC to address first aid in the operating units. Visit to the mill and estates indicated each station and gangs were equipped with first aid kits. Interview with the respective first aid holders indicated that they were well aware on the methods to use the items in the first aid boxes. The boxes are regularly monitored by the mill and estate Hospital Assistants to replenish the used items and replace expired items. Records of items used were also maintained and available in the boxes. Latest inspection as follows:</p> <table><tr><td>Estate/ Mill</td><td>First Aid Training date</td><td>Latest First Aid Monitoring Record</td></tr><tr><td>West POM</td><td>13/01/2023</td><td>23/02/2024</td></tr><tr><td>West Estate</td><td>13/01/2023</td><td>23/02/2024</td></tr></table> <p><u>West Estate</u></p>	Estate/ Mill	ERP Training date	West POM	31/03/2023	West Estate	21/07/2023	Estate/ Mill	First Aid Training date	Latest First Aid Monitoring Record	West POM	13/01/2023	23/02/2024	West Estate	13/01/2023	23/02/2024	
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		<p>Accident records were maintained and updated monthly at the estate. The JKKP 8 form have been submitted for the year ending 2023 on 02/01/2024 with reference number JKKP8/151210/2024. There were 8 accidents recorded with 14 days TLA.</p> <p><u>West POM</u></p> <p>Accident records were maintained and updated monthly at the mill. The JKKP 8 form have been submitted for the year ending 2023 on 23/01/2024 with reference number JKKP8/170985/2023. There is amended report has been submitted on 09/02/2024 with reference number JKKP8/152404/2023. There were 1 accident recorded with 17 days TLA.</p> <p>Minor Non-conformities</p> <p>First aid box contents was expired.</p> <p>Inspection of First Aid Box at West POM (Laboratory) It was found 2 items Non Woven Wound Dressing was expired on 12/11/2023. Monthly inspection has been conducted by MA as per verification records. It was not in line with First Aid in Workplace Procedure 2021 Section 7.3.3 "It is essential that first aid boxes be checked frequently so as to make sure they are fully equipped, no expired product and all items are usable. Material used should be replaced as soon as possible".</p>			
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>Refer PPE Issuance record for the year 2023. Based on the HIRARC carried out at the estates/mill the PPE types for the various activities has been identified and implemented.</p> <table><tr><td>Category</td><td>PPE provided</td></tr></table>	Category	PPE provided	Complied
Category	PPE provided				

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		Tractor Driver	Safety Helmet, Safety Shoes, Ear Plug, Safety Vest.		
		Sprayers	Respirator, nitrile glove, goggles, wellington boots, apron.		
		Manuring	Apron, wellington boots, dust mask, nitrile glove.		
		Harvester	Safety helmet, Goggle, sickle cover, hand glove, wellington boots		
		Similarly, the mill issued PPE to its employees for their protection at workplace. Records of PPE issued are maintained individually to all employees. PPE issued to the workers is safety helmets, safety shoes. Special PPE for workers assigned to height, confined space. Safety shoes issued on a 6 monthly basis and recorded.			
		Category	PPE provided		
		Mill operator	Safety boots, earmuff, safety vest, helmet, cotton glove		
		Water treatment Plant Operator	Safety boots, earmuff, safety vest, helmet, cotton glove, dust mask.		
		Workshop	Safety Helmets, Goggles, Leather Gloves, safety Shoes.		

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		<p>The mill and estates visited provided appropriate PPE to all workers according to the job type. The PPE given as per HIRARC and Personal Protective Equipment (PPE) Procedure, UM/HSE/OCP/03 dated 09/03/2021.</p> <p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition.</p>									
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>All workers are provided with medical care which is borne by the operating units management. Each operating unit has its own dispensary managed by a certified Hospital Assistant. There are no restrictions for workers to obtain medical aid from the dispensary. In case of major injuries or health issues, workers are referred to private clinics or hospitals which is totally borne by the management as well.</p> <p>All workers are protected via insurance in accordance with Malaysian Law via SOCSO contribution. The monthly contribution was evident via the PERKESO Monthly Salary Contribution (Form 8A) for the workers as following.</p> <table border="1"> <thead> <tr> <th>Operating Units</th><th>Month</th><th>Total Workers</th><th>Amount</th></tr> </thead> <tbody> <tr> <td>West POM</td><td>Dec 2023</td><td>551</td><td>RM XX,XXX.XX</td></tr> </tbody> </table>	Operating Units	Month	Total Workers	Amount	West POM	Dec 2023	551	RM XX,XXX.XX	Complied
Operating Units	Month	Total Workers	Amount								
West POM	Dec 2023	551	RM XX,XXX.XX								

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			Jan 2024	547	RM XX,XXX.XX	
		West Estate	Dec 2023	132	RM X,XXX.XX	
			Jan 2024	134	RM X,XXX.XX	
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	Average Days Worked
			Cases	TLA		
		West POM	1	17	295,816	103
		West Estate	8	104	115,000	575
Principle 7: Protect, conserve and enhance ecosystems and the environment						
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.						
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	The estates continued to monitor the Implementation of Integrated Pest Management (IPM) plans. a) The estates had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. The plan was guided by SOP dated Dec 2016 index no 17.10 beneficial plant				Complied

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		<p>protocol.</p> <p>b) In order to minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as <i>Turnera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i>, along the roadsides and designated points in the fields and also within the nursery perimeter.</p> <p>c) The plan also advocated single layer EFB mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and diseases had been continued. These monthly detection and observations were carried by staff.</p> <p>All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year where recommended by the PA /Agronomist. Baiting are continued until bait acceptance threshold level.</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM. The estates have declared this compliance in the status of IPM species invasiveness.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There was no land preparation in SOU 9 Mill and Estates by burning ever since Sime darby Plantation Berhad practiced zero burning as per the policy in:</p> <p>a) EQMS-SOP-SectionB2 - Under felling/clearing & land preparation</p> <p>b) Carbon Policy</p> <p>SDP has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded,</p>	Complied

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		windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.																
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																		
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	The written justification in Standard Operating Procedure (SOP) of all agrochemicals are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Berhad. Refer to Sime Darby 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	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. - Critical (Major) compliance -	Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate. Sighted the sampled records of pesticides usage (A.I.) per ha at estate visited FY 2023 (to date) as follows: <u>West Estate</u> <table><tr><th>Month</th><th>Quantity (a.i/Ha)</th><th>Quantity (a.i/FFB)</th></tr><tr><td>Dec 2023</td><td>0.36</td><td>0.24</td></tr><tr><td>Nov 2023</td><td>0.77</td><td>0.48</td></tr><tr><td>Oct 2023</td><td>0.21</td><td>0.11</td></tr><tr><td>Sept 2023</td><td>0.29</td><td>0.16</td></tr></table>	Month	Quantity (a.i/Ha)	Quantity (a.i/FFB)	Dec 2023	0.36	0.24	Nov 2023	0.77	0.48	Oct 2023	0.21	0.11	Sept 2023	0.29	0.16	Complied
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Sept 2023	0.29	0.16																

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		Aug 2023	1.16	0.74	
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5. The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan. Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas. Paraquat was eliminated. In replace, alternatives such as Glyphosate is used instead.</p>			Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There is no prophylactic use of pesticides in all estates visited.</p>			Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ol style="list-style-type: none"> Judgment of the threat and verify why this is a major threat Why there is no other alternative which can be used Which process was applied to verify why there is no other less hazardous alternative What is the process to limit the negative impacts of the application 	<p>The Chemical Registers for the mill and sampled estates were available for verification and reviewed yearly and as and when there are introductions of new chemicals in the operations.</p> <p>The register showed that only class III & IV pesticides were used at the mill and estates. Paraquat and Monocrotophos was eliminated. In its place, less hazardous alternatives such as Glyphosate and Acephate was used instead.</p>			Complied

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	<p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>																
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>The pesticides operators have been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly health surveillance done by the Medical Assistant. Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators based on the PPE issuance forms. Reviewed the training records as per criteria 3.7.2. Sampled the training conducted for pesticide handlers as below:</p> <p><u>West Estate</u></p> <table><tr><td>Training</td><td>Date</td></tr><tr><td>Chemical Sprayer Training</td><td>14/07/2023</td></tr><tr><td>Chemical Handling & Safety Training</td><td>28/09/2023</td></tr><tr><td>PPE Sprayer and Calibration Training</td><td>16/01/2023</td></tr></table> <p><u>West POM</u></p> <table><tr><td>Training</td><td>Date</td></tr><tr><td>MSDS and CSDS Training</td><td>06/12/2023</td></tr><tr><td>Chemical Handling Training</td><td>07/04/2023</td></tr></table>	Training	Date	Chemical Sprayer Training	14/07/2023	Chemical Handling & Safety Training	28/09/2023	PPE Sprayer and Calibration Training	16/01/2023	Training	Date	MSDS and CSDS Training	06/12/2023	Chemical Handling Training	07/04/2023	Complied
Training	Date																
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7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p>	<p>Pesticides were found stored in the mill and all estate's Chemical Store in accordance with the Occupational Safety and Health Act</p>	Complied														

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	- Critical (Major) compliance -	1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the storekeeper was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety Data Sheet were available.													
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	<p>The procedure SD/SDP/PSQM (ESH)/203-EN1-Scheduled Wastes (Hazardous Waste) Management has been established.</p> <p>a) Collection of SW is made by Kxxxxa Sxx Bxx and Sime Darby Industrial, licensed vendors registered with DOE.</p> <p>b) The clinical waste SW 404 is disposed to Kxxxxxi Axxx Sxx Bxx</p> <p>c) Empty containers were tripled rinsed, pierced and delivered to a registered recycler company M/s XX Sxxxa Exxxxxxxxx by DOE (Letter dated 24/10/2018).</p> <table border="1"> <thead> <tr> <th>Date</th><th>Empty container</th><th>Ally bottle</th><th>Kenlon Container</th></tr> </thead> <tbody> <tr> <td>30/09/2023</td><td>429 pcs</td><td>210 kg</td><td>72 pcs</td></tr> <tr> <td>06/01/2023</td><td>1269 pcs</td><td>107 kg</td><td>80 pcs</td></tr> </tbody> </table>	Date	Empty container	Ally bottle	Kenlon Container	30/09/2023	429 pcs	210 kg	72 pcs	06/01/2023	1269 pcs	107 kg	80 pcs	Complied
Date	Empty container	Ally bottle	Kenlon Container												
30/09/2023	429 pcs	210 kg	72 pcs												
06/01/2023	1269 pcs	107 kg	80 pcs												
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	Verified during interview and site visit confirmed that there is no aerial spraying and drone spraying conducted in West Estate.	Complied												

7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>The CHRA of each operating units have recommended the necessity of annual medical surveillance for pesticide applicators exposed to pesticides that are classified as organophosphates. Medical Surveillance were conducted in the mill and estates based on the recommendation of the CHRA for workers exposed to hazardous chemicals. Results of annual medical surveillance were available in the estates for verification as follows.</p> <p>West POM - Medical Surveillance Programme has been performed successfully for the year 2023 for the mill workers exposed to hazardous chemicals and fumes. A total of 21 workers have been examined on 15/12/2023 at Klinik XXXXXX. The results indicated that all workers were declared fit to work.</p> <p>West Estate - The medical surveillance programme for the year 2023 has been performed on 30/03/2023 at Klinik XXXXXX for 18 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work.</p>	Complied
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>All estates have prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Gender Policy and Occupational Safety and Health Policy signed by the Managing Director on 05/05/2022. It was sighted during the visit to the stores there were signage stating that pregnant and breast-feeding women are not allowed to enter the chemical stores.</p> <p>As per verification with master list of workers, medical surveillance report, interview with management and site visit, it was confirmed that there is no under age of 18, pregnant or breastfeeding women and other people that have medical restrictions was assigned for chemical related works in the two estates visited. If there is any workers having medical restrictions as per examination during</p>	Complied

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		medical surveillance, they will be offered alternative equivalent work in the estates.	
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>All waste and pollution are identified and documented in the Waste Management Action Plan. The compilation for 2024 was made by the Sustainability Department applicable to the estate and mill. The common significant environmental receptors for the estate/mill operations among others as summarized below;</p> <ul style="list-style-type: none"> a) Air - sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG b) Water - cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down c) Land - Scheduled waste, domestic waste and industrial/field operations. <p>The waste generated from the estate and mill operations as shown below:</p> <ul style="list-style-type: none"> a) Scheduled Waste - Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries b) Domestic Waste - rubbish from the estate complex and employees' quarters rubbish from the mill complex and employees' quarters c) Industrial Waste - scrap iron Fibre, palm kernel shell, boiler ash, d) Sewage - Sewage from housing/office complex <p>The pollution identified from the estate/mill activities as described below:</p>	Complied

		<ul style="list-style-type: none"> a) Black Smoke - Emission from vehicles/engines, Boilers b) Odor & Gases - Activities from the effluent treatment c) Leakage of lubricant - Storage & vehicle maintenance <p>The pollution prevention plan as practiced in the estates as summarized in 7.10.3 below. The estates also maintained records of quantity generated and disposal made for the scheduled waste. Based on the samples taken, the documentation and practices made in relation to the waste and pollution management were concluded effective to address concerns on the environmental quality. West Estate reviewed the waste management plan 2024 dated 23/02/2024. Similarly West Palm Oil Mill reviewed on 02/01/2024.</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>In West POM and the estate in SOU 9 procedure SD/SDP/PSQM (ESH)/203- EN1 – Scheduled Wastes (Hazardous Waste) Management has been established.</p> <ul style="list-style-type: none"> a) Management and disposal of wastewater 2024 has been established compiled by Assistant Engineer. b) Waste Management Plan 2024 has been established prepared by QA and verified by the Assistant Engineer in Jan 2024. The management Plan for 2024 has yet to be finalised the source and disposal method of scheduled waste, domestic waste and industrial waste. c) Based on Environmental Impact Evaluation (file no: SM/5.2/EIE) and Environment Aspect and Impact Identification (file no: SM/5.2/EAI) improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination. d) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the 	Non-compliance

- hazards involved and how the chemicals should be used and disposed in a safe manner.
- e) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The CU scheduled waste is disposed to the following vendors registered with DOE, Kubota and SDI. SW404 clinical waste are disposed to Kxxxxxx Axxx Sxx Bxx via transporter Fxxxx Sxxxxxx Sxxxxxxs. Records as shown below

	Date	SW 409	SW 322	SW 410	SW 305	SW 306
West POM	21/02/2024	0.243	0.300	0.493	0.200	0.200
West POM	13/09/2023	0.111	0.300	0.090	0.200	0.400
	Date	SW 404	SW 409	SW 410	SW 305	SW 306
West Estate	21/02/2024	-	0.005	0.035	-	-
West Estate	20/11/2023	-	0.002	0.023	0.060	-
West Estate	01/11/2023	-	0.015	0.042	0.387	-
West Estate	04/01/2023	-	-	0.045	0.170	-

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		West Estate	15/02/2024	0.0062	-	-	-	-	
		Records of domestic waste disposal to Majlis Perbandaran Kuala Langat were sighted and verified. Collections are made 2x/week. Minor Non-conformities. A site visit to West Estate field no P18C sighted thrash being dumped at a workers' resting area. This includes waste of aged empty plastic bottles, drinks and food packets. In addition, there were also sign of spot burning observed at the site.							
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	There was no land preparation in SOU 9 Mill and Estates by burning ever since SDPB practiced zero burning as per the policy and guidelines in: a) EQMS-SOP-Section B2 - Under felling/clearing & land preparation b) Responsible Agriculture Charter Rev 2020 c) Land Preparation for Terracing in ARM Manual. As advocated, the estate practiced zero burning. In the replants visited during the audit in the Estate, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.							Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.									
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	SOU 9 continued to use and implement SOPs for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOPs were presented to the							Complied

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	<p>- Minor compliance -</p>	<p>audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOPs.</p> <ul style="list-style-type: none"> a) Sime Darby Plantation Agriculture Reference Manual (ARM), Issue No: 2 dated June 2021 b) Estate Quality Management System (EQMS) Manual dated 01/11/2008, c) Safety Standard Operating Procedures (SSOP) dated 25/02/2015, d) Sustainable Plantation Management System Manual (SPMS), e) "Guidelines On River Management" Manual, ESH Management System Manual dated 01/07/2012, f) Occupational Safety and Health Manual dated 03/03/2008, g) Pictorial Safety Standards and Security Guidelines (PSS). h) Plantations/Mill Quality Management System (PQMS/MQMS) std operating manual <p>All the estates and mill operations were guided through the manuals and SOPs. The procedures as documented in the Agriculture Reference Manual were disseminated to the staff/workers through morning briefings and training. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The ARM included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Site inspection and interview with workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs, the bottom-line of which is Responsible Agricultural Charter the care for their safety and health and the environment.</p>	
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7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Periodic tissue and soil sampling were carried out in the Estate to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. For the estate Agronomic assessment and fertiliser recommendation was conducted by Sime Darby Research Plant Nutrition & Protection Unit PNP Central Region to formulate the 2024 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement.</p> <p>Annual foliar sampling for Ash, N, P, K, Mg, Ca & B had been were carried out in the estate. Soil analysis for PH, Org C, Total N, Total P, Avail P, Exch K, Exch Ca & Exch Mg was carried out on a 5-year cycle basis. All foliar and soil sampling & analysis was conducted by Sime Darby Research Plant Nutrition & Protection Unit PNP Central Region. Soil analysis is made on a 5-year cycle. The latest analysis being:</p> <table><tr><td>Estate</td><td>Report Date</td><td>Report No</td></tr><tr><td>Foliar Analysis</td><td>03/08/2023</td><td>E1521696</td></tr><tr><td>Soil Analysis</td><td>07/04/2023</td><td>S82/2023</td></tr></table>	Estate	Report Date	Report No	Foliar Analysis	03/08/2023	E1521696	Soil Analysis	07/04/2023	S82/2023	Complied
Estate	Report Date	Report No										
Foliar Analysis	03/08/2023	E1521696										
Soil Analysis	07/04/2023	S82/2023										
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>West Estate had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of compost. In addition, during replanting, palms were felled, chipped, windowed and left to decompose. Records showed that the estates had applied EFB at 20-40 tons/ha and records showed that EFB metric ton in 2023/24 was as follows:</p>	Complied									

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		<table><tr><td>Field no</td><td>Ha</td><td>Mt</td><td>Month</td></tr><tr><td>P02A1</td><td>79.98</td><td>34.04</td><td>Oct</td></tr><tr><td>P09A</td><td>50.94</td><td>1875</td><td>Jan–Mac</td></tr><tr><td>P011A</td><td>77.19</td><td>479.79</td><td>Feb</td></tr></table>	Field no	Ha	Mt	Month	P02A1	79.98	34.04	Oct	P09A	50.94	1875	Jan–Mac	P011A	77.19	479.79	Feb						
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P09A	50.94	1875	Jan–Mac																					
P011A	77.19	479.79	Feb																					
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	<p>Fertilizer application program was monitored using records like program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc. Review of the records revealed that the actual fertilizers applied in 2023/24 was in line with the program. The following fertilizers were applied in West Estate subject to the recommendation by the Agronomist.</p> <table><tr><td>Fertilizer</td><td>Kg/palm</td><td>Application Month</td></tr><tr><td>Borate</td><td>0.10</td><td>July</td></tr><tr><td>NK C1/C2</td><td>3.00-4.00</td><td>Jan/July</td></tr><tr><td>Rock Phosphate</td><td>1.50</td><td>May /June</td></tr><tr><td>GML</td><td>2.50</td><td>April</td></tr><tr><td>Kieserite</td><td>1.25</td><td>April</td></tr><tr><td>CCM 65</td><td>1.50</td><td>Jan/April</td></tr></table>	Fertilizer	Kg/palm	Application Month	Borate	0.10	July	NK C1/C2	3.00-4.00	Jan/July	Rock Phosphate	1.50	May /June	GML	2.50	April	Kieserite	1.25	April	CCM 65	1.50	Jan/April	Complied
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Criterion 7.5: Practices minimise and control erosion and degradation of soils.																								
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	<p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available. The soil series in West Estate were classified as follows</p> <table><tr><td>Soil series</td><td>Carey</td><td>Jawa</td><td>Merbok</td><td>Linau</td><td>P Botak</td></tr><tr><td>%</td><td>1.86</td><td>53.38</td><td>3.64</td><td>9.05</td><td>4.34</td></tr></table>	Soil series	Carey	Jawa	Merbok	Linau	P Botak	%	1.86	53.38	3.64	9.05	4.34	Complied									
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		<table><tr><td>Soil series</td><td>Sedu</td><td>Selangor</td><td>Tongkang</td><td>Bernam</td><td>-</td></tr><tr><td>%</td><td>6.41</td><td>8.40</td><td>10.50</td><td>2.42</td><td>-</td></tr></table> <p>There were no other problem soils (e.g. podzols and acid sulphate soils) on SOU 9.</p>	Soil series	Sedu	Selangor	Tongkang	Bernam	-	%	6.41	8.40	10.50	2.42	-	
Soil series	Sedu	Selangor	Tongkang	Bernam	-										
%	6.41	8.40	10.50	2.42	-										
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>The commitment to protect and conserve biodiversity and ecosystems is articulated in the Sime Darby Plantation Group Sustainability and Quality Policy Statement, signed by the Group Managing Director on 2/12/2019, as well as the Responsible Agriculture Charter Revised 2020. 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> <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in some mature areas. The cover crop <i>Mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>Neprolepis biserrata</i> in the inter rows were sighted during the visit. The slope maps were provided by the R&D Precision Agriculture Unit with details as follows;</p>	Complied												

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		<table> <tr> <th>Topography</th><th>%</th><th>Topography</th><th>%</th></tr> <tr> <td>0-2</td><td>100</td><td>12-20</td><td>0</td></tr> <tr> <td>2-6</td><td>0</td><td>20-25</td><td>0</td></tr> <tr> <td>6-12</td><td>0</td><td>>25</td><td>0</td></tr> <tr> <td></td><td></td><td>Total</td><td>100</td></tr> </table>	Topography	%	Topography	%	0-2	100	12-20	0	2-6	0	20-25	0	6-12	0	>25	0			Total	100	
Topography	%	Topography	%																				
0-2	100	12-20	0																				
2-6	0	20-25	0																				
6-12	0	>25	0																				
		Total	100																				
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	This compliance being addressed in Responsible Agriculture Charter Rev 2020 stating the following among others; "Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly".	Complied																				
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.																							
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.	Complied																				
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	There is no peat soil or soil categorized as marginal or fragile soil at West Estate. As addressed in the Sime Darby Plantation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2: a) Protect and enhance forest: "We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through: i. No new development of peat areas, regardless of depth or location. ii. We will seek to rehabilitate existing plantings on peats where possible.	Complied																				

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7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys are done and available in a soil map at the estate. Topographic contour map is also available which are both used to manage the drainage and road works in the estate.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil at West Estate. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	There is no peat soil or soil categorized as marginal or fragile soil at West Estate. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil at West Estate. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	The water and ground cover management programme is documented in the Sime Darby Plantation Agricultural Reference Manual (Water Management in Coastal and Peat lands), Issue No:2 dated June 2021. Details are described in 7.8.1. individual estates and mill had their respective water management plan mainly to monitor among others the following; a) Monitor the quality of main water inlet/outlet for pollutants from estate's operations. b) Contingency during water shortage. c) Field water management - side pit construction d) Adequate field drains	Complied

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		e) Reuse/recycle waste water. f) Peat soil water management	
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at West Estate. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Not Applicable
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at West Estate. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at West Estate. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Not Applicable

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	- Critical (Major) compliance -																		
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.																			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>Both the Mill and Estate had established its Water Management Plan for year 2024 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <p>a) implementation of rain water harvest,</p> <p>b) construction of water gate for effective management of field drains,</p> <p>c) establishment of <i>Mucuna bracteata</i> to prevent erosion,</p> <p>d) side drain at field road to control water, frond stacking,</p> <p>e) Enhancement of ground vegetation at bare ground area.</p> <p>The water sources are as shown below;</p> <table><tr><th>Source</th><th>usage</th><th>Monitoring & measurement</th></tr><tr><td>SYABAS</td><td>Purchased for domestic consumption</td><td>Monitoring water supply</td></tr><tr><td>Rain water</td><td>Domestic use Workshop Chemical mixing</td><td>Rain fall data</td></tr><tr><td>Water tank</td><td>Emergency water supply</td><td>Monitor utilization /stock</td></tr></table> <p>The contingency plan during water shortage</p> <table><tr><th>Area/incident</th><th>Action steps</th></tr><tr><td>Water shortage/</td><td>to obtain water from local authority /estate catchment</td></tr></table>	Source	usage	Monitoring & measurement	SYABAS	Purchased for domestic consumption	Monitoring water supply	Rain water	Domestic use Workshop Chemical mixing	Rain fall data	Water tank	Emergency water supply	Monitor utilization /stock	Area/incident	Action steps	Water shortage/	to obtain water from local authority /estate catchment	Complied
Source	usage	Monitoring & measurement																	
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		<div>prolonged dry season</div>	<div>to train/educate staff/workers to conserve water to seek assistance from local authority to obtain treated water supply from mill's WTP</div>						
		<div>Severe water pollution/Contamination</div>	<div>to obtain water from local authority to train/educate staff/workers to conserve water to seek assistance from local authority to obtain treated water supply from mill's WTP</div>						
		<div>Salt water intrusion</div>	<div>Flushing out water during dry & low tide season Construction of screw gate to prevent entry into field drain Regular inspection during high tide to identify any tide gate and flap door.</div>						
		<div>The Estate had implemented water managements plans which covered: <div>a) Water shortage contingencies b) Water pollution prevention c) Reduce wastage d) Identification & management of waste waters e) Monitoring rainfall f) Regular water quality analysis.</div> Water management plan review date sighted on selective basis.</div>							
		<table><tr><td>Estate/Mill</td><td>Review date</td><td>Issues</td></tr><tr><td>West POM</td><td>02/01/2024</td><td>Nil</td></tr></table>	Estate/Mill	Review date	Issues	West POM	02/01/2024	Nil	
Estate/Mill	Review date	Issues							
West POM	02/01/2024	Nil							

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		West Estate	23/02/2024	Nil																	
		The water reduction plan is shown below;																			
		<table><tr><th>Issues/Areas</th><th>Action Steps</th></tr><tr><td>Rain water collection</td><td>Large containers are to be placed at strategic locations to collect rain water The rainwater shall be recycled for washing heavy machinery</td></tr><tr><td>Leakage on plumbing system</td><td>Frequent inspection to detect leakage Fix any leakage</td></tr><tr><td>Water compartmentalization</td><td>To conserve level of soil moisture To minimize water stress during dry season</td></tr><tr><td>Handling of chemicals</td><td>To recycle water spillage while mixing of chemical at mixing area</td></tr><tr><td>education</td><td>Avoid excessive usage during cleaning Close pipe to prevent water dripping</td></tr><tr><td>Re-streaming</td><td>Re stream from sterilizer condensate pit for dilution</td></tr></table>				Issues/Areas	Action Steps	Rain water collection	Large containers are to be placed at strategic locations to collect rain water The rainwater shall be recycled for washing heavy machinery	Leakage on plumbing system	Frequent inspection to detect leakage Fix any leakage	Water compartmentalization	To conserve level of soil moisture To minimize water stress during dry season	Handling of chemicals	To recycle water spillage while mixing of chemical at mixing area	education	Avoid excessive usage during cleaning Close pipe to prevent water dripping	Re-streaming	Re stream from sterilizer condensate pit for dilution		
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		The Mill Identification & Management of Waste Water																			
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7.8.2	(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas	West Estate continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estate adopted the existing SDP policy to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. Water courses and wetlands are	Complied																								

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	<p>provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014). The buffer zones established are as follows:</p> <table><tr><td>River width</td><td>Buffer Zone</td><td></td><td>River width</td><td>Buffer Zone</td></tr><tr><td>> 40 meters</td><td>50 meters</td><td></td><td>5 - 10 meters</td><td>10 meters</td></tr><tr><td>20 - 40 meters</td><td>40 meters</td><td></td><td>< 5 meters</td><td>5 meters</td></tr><tr><td>10 - 20 meters</td><td>20 meters</td><td></td><td>-</td><td>-</td></tr></table> <p>The signboards were displayed accordingly at the site where applicable. The guideline was issued by the Group sustainability department (GSD) with latest revision dated on 13/6/2011. The signboards were displayed accordingly at the site where applicable. The guideline was issued by the Group sustainability department (GSD) with latest revision dated on 13/6/2011. The buffer zones identified at the estates are as listed in the HCV areas except for the HCV 6 Hatters Castle.</p> <p>Samples are taken by the mill management for detection of any pollution arising from the mill and estate activities. Water samples from the intake point and outlet are taken for analysis for detection of any contamination /quality effect to the water courses.</p> <p>Among others management plan taken;</p> <ul style="list-style-type: none">a) Regular inspection at buffer/HCV areasb) Monitor water from surrounding areasc) Track, measure and report all activities around river	River width	Buffer Zone		River width	Buffer Zone	> 40 meters	50 meters		5 - 10 meters	10 meters	20 - 40 meters	40 meters		< 5 meters	5 meters	10 - 20 meters	20 meters		-	-	
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		<table><tr><th colspan="8">West Mill - Water Analysis Parameter</th></tr><tr><th></th><th>Unit</th><th colspan="3">14/12/2023</th><th colspan="3">10/03/2023</th></tr><tr><th></th><th></th><th>DAM</th><th>DG</th><th>DS</th><th>DA M</th><th>DG</th><th>DS</th></tr><tr><td>pH</td><td></td><td>7.46</td><td>6.48</td><td>7.20</td><td>7.5 3</td><td>7.03</td><td>7.25</td></tr><tr><td>BOD</td><td>mg/l</td><td>4</td><td>7</td><td><1</td><td>2</td><td><1</td><td><1</td></tr><tr><td>COD</td><td>mg/l</td><td>68</td><td>120</td><td>2620</td><td>40</td><td>1500</td><td>2640</td></tr><tr><td>T Solid</td><td>mg/l</td><td>310</td><td>836</td><td>28068</td><td>328</td><td>19129</td><td>38758</td></tr><tr><td>S Solid</td><td>mg/l</td><td>16</td><td>50</td><td>144</td><td>14</td><td>66</td><td>240</td></tr><tr><td>T Nitrogen</td><td>mg/l</td><td>2</td><td>2</td><td>2</td><td>2</td><td>2</td><td>2</td></tr><tr><td>A Nitrogen</td><td>mg/l</td><td><1</td><td>1</td><td><1</td><td><1</td><td><1</td><td><1</td></tr><tr><td>Oil & Grease</td><td>mg/l</td><td>2</td><td>2</td><td>2</td><td>1</td><td>1</td><td>1</td></tr></table> <p>d) Train and educate workers.</p> <p>There were no issues on the monthly water analysis for the sampling points. All units in mg/l except pH. Ref DAM - Drain after mill / DG - Tide gate / DS - Discharge into sea.</p> <p>.</p>	West Mill - Water Analysis Parameter									Unit	14/12/2023			10/03/2023					DAM	DG	DS	DA M	DG	DS	pH		7.46	6.48	7.20	7.5 3	7.03	7.25	BOD	mg/l	4	7	<1	2	<1	<1	COD	mg/l	68	120	2620	40	1500	2640	T Solid	mg/l	310	836	28068	328	19129	38758	S Solid	mg/l	16	50	144	14	66	240	T Nitrogen	mg/l	2	2	2	2	2	2	A Nitrogen	mg/l	<1	1	<1	<1	<1	<1	Oil & Grease	mg/l	2	2	2	1	1	1	
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7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -	Based on "Jadual Pematuhan" (license no 003180 valid till 30/06/2024) EPOM disposed effluent on land application in West Estate. Sighted quarterly report has been submitted to DOE. Latest submission for to DOE on Jan 2024. Among the indicators were:	Complied																																																																																								

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		<table><tr><td>Oct – Dec 23</td><td>STD</td><td>09/10/2023</td><td>16/11/2023</td><td>04/12/2023</td></tr><tr><td>pH</td><td>-</td><td>6.96</td><td>7.24</td><td>7.02</td></tr><tr><td>BOD mg/l</td><td>5000</td><td>570</td><td>1155</td><td>895</td></tr><tr><td>A Nitrogen</td><td>-</td><td>172</td><td>167</td><td>162</td></tr><tr><td>Total N</td><td>-</td><td>296</td><td>424</td><td>324</td></tr><tr><td>S Solids</td><td>-</td><td>640</td><td>14850</td><td>21800</td></tr><tr><td>Oil & Grease</td><td>-</td><td>6</td><td>5</td><td>16</td></tr></table> <p>The effluent is land applied at field no P07G1. The site was visited and confirmed no spillage being observed from the furrow row.</p>	Oct – Dec 23	STD	09/10/2023	16/11/2023	04/12/2023	pH	-	6.96	7.24	7.02	BOD mg/l	5000	570	1155	895	A Nitrogen	-	172	167	162	Total N	-	296	424	324	S Solids	-	640	14850	21800	Oil & Grease	-	6	5	16	
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7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	<p>The mill processing water are obtained from the water catchment adjacent to the mill complex source from the SYABAS supply. The water usage monitoring is made on a monthly basis with the latest recording detailed sampled (water usage m3/per mt of fresh fruit bunches (FFB) below;</p> <table><tr><td>Month</td><td>Ratio</td><td>Month</td><td>Ratio</td></tr><tr><td>Jan</td><td>1.79</td><td>July</td><td>0.69</td></tr><tr><td>Feb</td><td>1.01</td><td>Aug</td><td>0.93</td></tr><tr><td>Mac</td><td>1.00</td><td>Sept</td><td>0.55</td></tr><tr><td>April</td><td>0.98</td><td>Oct</td><td>0.47</td></tr><tr><td>May</td><td>0.70</td><td>Nov</td><td>0.66</td></tr></table>	Month	Ratio	Month	Ratio	Jan	1.79	July	0.69	Feb	1.01	Aug	0.93	Mac	1.00	Sept	0.55	April	0.98	Oct	0.47	May	0.70	Nov	0.66	Complied											
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		<table><tr><td>June</td><td>0.95</td><td>Dec</td><td>1.03</td></tr><tr><td>-</td><td>-</td><td>Total</td><td>123774 m3</td></tr></table> <p>The variation in the water usage is attributed to factors linked to rainy days, significant boiler water rinsing/discharging for maintenance etc.</p>	June	0.95	Dec	1.03	-	-	Total	123774 m3		
June	0.95	Dec	1.03									
-	-	Total	123774 m3									
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised												
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2024. The document was updated on Jan 2024. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table><tr><th>Target</th><th>Objective</th><th>Action plan</th></tr><tr><td>Backhoe tractor</td><td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td><td>to ensure the vehicle engine is turn off during idle time to record vehicle activity which consume fuel</td></tr><tr><td>Van / Supervisory vehicle</td><td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td><td>to record vehicle activity in order to eliminate waste activity which consume fuel. to turn off vehicle engine during idle time.</td></tr></table>	Target	Objective	Action plan	Backhoe tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	to ensure the vehicle engine is turn off during idle time to record vehicle activity which consume fuel	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	to record vehicle activity in order to eliminate waste activity which consume fuel. to turn off vehicle engine during idle time.	Complied
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		<p>The utilization of fossil fuel ratio in 2023 are being monitored with records shown below with baseline of 2.00 L/FFB mt (estate) and 0.20 L/FFB mt (mill) respectively. The mill uses diesel stock from the estate storage.</p> <table><tr><td></td><td>West Estate</td><td>West POM</td><td></td><td>West Estate</td><td>West POM</td></tr><tr><td>Jan</td><td>1.61</td><td>0.14</td><td>July</td><td>1.79</td><td>0.24</td></tr><tr><td>Feb</td><td>1.82</td><td>0.24</td><td>Aug</td><td>1.66</td><td>0.25</td></tr><tr><td>Mac</td><td>2.09</td><td>0.23</td><td>Sep</td><td>1.45</td><td>0.24</td></tr><tr><td>Apr</td><td>1.89</td><td>0.22</td><td>Oct</td><td>1.53</td><td>0.24</td></tr><tr><td>May</td><td>1.78</td><td>0.26</td><td>Nov</td><td>1.62</td><td>0.23</td></tr><tr><td>Jun</td><td>2.14</td><td>0.26</td><td>Dec</td><td>1.73</td><td>0.28</td></tr><tr><td colspan="3"></td><td>Total</td><td>15132 L</td><td>35561 L</td></tr></table>		West Estate	West POM		West Estate	West POM	Jan	1.61	0.14	July	1.79	0.24	Feb	1.82	0.24	Aug	1.66	0.25	Mac	2.09	0.23	Sep	1.45	0.24	Apr	1.89	0.22	Oct	1.53	0.24	May	1.78	0.26	Nov	1.62	0.23	Jun	2.14	0.26	Dec	1.73	0.28				Total	15132 L	35561 L	
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		<p>Performance variation in view of several factors i.e.</p> <ul style="list-style-type: none">a) infrastructure of estates,b) community sizec) no. of vehicles / age of machine.d) Weather interference / crop production volume																																																	

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		<p>There is no opportunity for the estate to capitalize the utilization of fibre/shell as part of their energy production in replacement of fossil fuel with the current technology limitation.</p> <p>West Mill</p> <p>A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2024, identified in the following</p> <ul style="list-style-type: none"> a) Environmental Aspect Identification Summary FY 2024 reviewed accordingly. b) Environmental Impact Evaluation Summary FY 2024 reviewed accordingly. c) EIA was reviewed annually with recent being on 20/02/2024. The changes recorded were in 2020 for the new inclusion of ESP for the boiler emission quality enhancement (commissioned on Mac 2020) and Tech Grade Oil Production (installed on Jan 2020) <p>The renewable energy usage & diesel consumption 2023 was established and monitored by monthly basis. Reduction plan and initiative for diesel usage – by maintenance of the boiler & machinery to ensure at optimum level, to monitor diesel usage, provide training to workers regarding reduce fuel and diesel usage for boiler. Diesel consumption for the mill as shown in the above table.</p>	
<p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			

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7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 9 Mill and Estate had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.</p> <p>a) The management from both estate and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adversely impact the environment.</p> <p>b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.</p>	Complied				
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	SOU 9 has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. There is no new development within the SOU 9 estate.	Complied				
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. (SM/5.2/EAI) and (SM/5.2/EIE) which covers estate and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly.</p> <table><tr><th>Issues</th><th>Management/Action Plan</th></tr><tr><td></td><td></td></tr></table>	Issues	Management/Action Plan			Complied
Issues	Management/Action Plan						

		Boiler-smoke	Black	To monitor condition of dust cyclone every 3 months To carry out boiler furnace cleaning weekly VORSEP installation commissioning in 2020 6 monthly stack sampling	3
		Effluent- Odor & gases		To maintain proper feeding into digestion process of effluent to prevent severe and unpleasant odour	
		Vehicles/Lorries-Leakage of lubricant/diesel		Ensure maintenance schedule to be strictly followed To place all lubricant oil drum on metal trays. Vehicles awaiting entry into the mill to be switched off	
		Domestic waste – odor and environmental pollution		Only organic waste to be disposed. No burning and NIL disposal of empty chemicals containers into landfill.	
		West Mill has conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS).			
a) The audit team has verified the condition of the CEMS during the audit.					
b) The system was found to be in functional condition.					
c) Data from the stack is connected online to DOE’s office. Boiler smoke emission data are within the DOE limit.					

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		The stack sampling was carried out by Axxx Hxxxx Ixxxxxxxi (M) Sxx Bxx. The mill has installed VORSEP commissioned in Dec 2020. The 2 Boilers shared 1 chimney for operations.	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	<p>There was no land preparation of existence or new planting in SOU 9 and Estate by burning ever since SDPB practiced zero burning as per the policy in:</p> <p style="margin-left: 40px;">a) Compliance to Responsible Agriculture Charter b) EQMS-SOP-Section B2 - Under felling/clearing & land preparation</p> <p>As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	<p>SDPB monitors any fire incident within its directly managed certification unit through hotspot application and report can be seen via website link as following: https://www.sdguthrie.com/who-we-are/sd-guthrie-worldwide/hotspot-dashboard/</p> <p>West Estate and Mill had its emergency response team should any fire incident occurs. In event of any fire incident, SDPB has established its emergency response plan established in the ERP procedure. The procedure was formalized by RSQM for use in all operating units in SDP Estates and mills. Training related to fire drill / prevention are conducted annually.</p>	Complied

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		<table><tr><td>Estate / Mill</td><td>Date</td><td>Date</td></tr><tr><td>West POM</td><td>31/03/2023</td><td>06/12/2023</td></tr><tr><td>West Estate</td><td>21/07/2023</td><td>29/01/2024</td></tr></table>	Estate / Mill	Date	Date	West POM	31/03/2023	06/12/2023	West Estate	21/07/2023	29/01/2024							
Estate / Mill	Date	Date																
West POM	31/03/2023	06/12/2023																
West Estate	21/07/2023	29/01/2024																
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Both the estate and the mill in SOU 9 held engagement with the adjacent stakeholders via briefing sessions as stated in ERP procedure Kertas Kerja Program Simulasi Kebakaran Lampiran A and Fire Prevention and Control Measure.</p> <p>a) Objective b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill e) Compliance to related legislative requirement f) Compliance to Human Rights Charter</p> <p>All stakeholders being briefed in the combined stakeholders' meetings. This is inclusive on the fire prevention and control measures akin to the earlier session in meetings.</p> <table><tr><td>Estate / Mill</td><td>Date</td><td>Attendee</td><td>Date</td><td>Attendee</td></tr><tr><td>West POM</td><td>23/11/2023</td><td>48</td><td>08/12/2022</td><td>45</td></tr><tr><td>West Estate</td><td>23/11/2023</td><td>48</td><td>08/12/2022</td><td>45</td></tr></table>	Estate / Mill	Date	Attendee	Date	Attendee	West POM	23/11/2023	48	08/12/2022	45	West Estate	23/11/2023	48	08/12/2022	45	Complied
Estate / Mill	Date	Attendee	Date	Attendee														
West POM	23/11/2023	48	08/12/2022	45														
West Estate	23/11/2023	48	08/12/2022	45														
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.																		

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7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2). Hence, the requirement under this indicator does not apply.	Not Applicable
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <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>PROCEDURAL NOTE:</p> <p>Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU 9 estate. Hence, the requirement under this indicator does not apply.	Not Applicable
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable	Not Applicable
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in</p>	<p>The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU 9 estate. Hence, the requirement under this indicator does not apply.</p> <p>The SOU 9 for the existing HCV present held an integrated management plan is developed in consultation, discussion and</p>	Not Applicable

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	<p>consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>briefing with the stakeholders during a Stakeholder Meetings held on 23/11/2023. Information in slides form in relation to RTE / HCV / Biodiversity management in the organization were presented. Therein containing the integrated management plan comprise among others covering the following scope.</p> <ul style="list-style-type: none"> a) Biological Diversity b) Management of High Conservation Value Area. <ul style="list-style-type: none"> i. There are 6 categories of HCV in the estates and mill ii. The HCV management using the concept of Access, plan, action and monitoring c) Rare Threatened and Endangered Species <ul style="list-style-type: none"> i. Definition and protection under law ii. Disciplinary action / Punishment / Legality Consequences iii. Continuous monitoring of RTE / HCV/ Biodiversity Areas iv. Flow chart of RTE Conflict management d) Emergency Evacuation Plan / Drill 	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU 9 estate. Hence, the requirement under this indicator does not apply.</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 place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working</p>	<p>The HCV re-assessment was compiled by PSQM team on May 2016 for West Estate SOU 9. Thereafter being reviewed on October 2020 by the Conservation & Biodiversity Unit Group Sustainability Department SDP. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <ul style="list-style-type: none"> a) Overview of HCV assessment 	Complied

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	<p>for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>b) Description of assessment area</p> <ul style="list-style-type: none"> - Landscape context - biodiversity & conservation values - ecosystem service / social & cultural values <p>c) HCV criteria & application to agriculture</p> <ul style="list-style-type: none"> - Visual observation & supporting information - Wildlife in plantation - decision on HCV status <p>d) HCV management / Monitoring.</p> <p>The report is given in details to provide the existence of HCV, complete with photo and description The conservation and management of such identified areas are also detailed therein. The HCV areas presence as identified by the West Estate within SOU 9 are given below;</p> <table border="1" data-bbox="1193 874 1895 1241"> <thead> <tr> <th>Area</th><th>Site</th><th>Ha</th><th>HCV Type</th></tr> </thead> <tbody> <tr> <td>Natural Ponds</td><td>P08A</td><td>4.79</td><td>HCV 4</td></tr> <tr> <td>Fringe Mangroves</td><td>P09G</td><td>39.84</td><td>HCV 4</td></tr> <tr> <td>Hatter's castle</td><td>P06A</td><td>1.12</td><td>HCV 6</td></tr> <tr> <td>Erosion Control Bund</td><td></td><td>53.64</td><td>HCV 4</td></tr> <tr> <td>Water catchment</td><td>-</td><td>0.60</td><td>HCV 4</td></tr> <tr> <td>Water catchment (Mill)</td><td>-</td><td>1.80</td><td>HCV 4 (Mill)</td></tr> <tr> <td>Total</td><td></td><td>101.79</td><td></td></tr> </tbody> </table> <p>All areas were sighted and verified. HCV of no 4 and 6 above are re-categorized areas from the normal buffer zone category. Hectare for the re-categorized areas has not affected the others category</p>	Area	Site	Ha	HCV Type	Natural Ponds	P08A	4.79	HCV 4	Fringe Mangroves	P09G	39.84	HCV 4	Hatter's castle	P06A	1.12	HCV 6	Erosion Control Bund		53.64	HCV 4	Water catchment	-	0.60	HCV 4	Water catchment (Mill)	-	1.80	HCV 4 (Mill)	Total		101.79		
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		<p>including the planted areas. All the HCVs were maintained by SDP special projects whilst the mangrove areas are under the jurisdiction of the state government. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented. Map verification and site visit confirmed that West estate is surrounded by river/straits and villages. The HCVs, conservation areas/environmentally sensitive areas e.g. bund along the stretches of river/straits which passes bordering through the estate had been identified and being monitored.</p> <p>Training in relation to the HCV management is shown below;</p> <table><tr><th>Subject</th><th>West Estate</th><th>West POM</th></tr><tr><td>Company Policies Briefing</td><td>01/03/2023</td><td>02/02/2024</td></tr><tr><td>RSPO/MSPO Awareness</td><td>21/02/2024</td><td>31/07/2023</td></tr><tr><td>HCV / RTE Awareness</td><td>10/01/2024</td><td>16/06/2023</td></tr></table>	Subject	West Estate	West POM	Company Policies Briefing	01/03/2023	02/02/2024	RSPO/MSPO Awareness	21/02/2024	31/07/2023	HCV / RTE Awareness	10/01/2024	16/06/2023	
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HCV / RTE Awareness	10/01/2024	16/06/2023													
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The CU management has established a standard monitoring document. Details provided include the following information;</p> <ul style="list-style-type: none">a) Areab) Field no and GPS coordinatec) Observation<ul style="list-style-type: none">- Encroachment /sign of trespassing- Wildlife issues/conflicts/sighting- Pollution /erosion issuesd) Maintenance of signage / fence	Complied												

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		<p>The monitoring being made by the AP during the security rounds in the estate complex. The field staff/Assistant also played a role in providing information during their daily rounds in the fields. Records furnished by the APs were sighted and verified.</p> <table><tr><th>Action steps</th><th>Management Plan</th></tr><tr><td>Inspection of HCV</td><td>Continuous inspection and recommendation To liaise with related agency</td></tr><tr><td>Protection or conservation & monitoring of biodiversity area.</td><td>To continuously collaborate with R& D to monitor the status & health of trees</td></tr><tr><td>Protection & conservation of mangrove forests area.</td><td>To erect signs indicating mangrove forest near coastal areas. To erect signs indicating mangrove forest as HCV areas for conservation.</td></tr><tr><td>Rehabilitation & habitat enhancement</td><td>To participate in tree planting divers tree species to enhance the surrounding biodiversity.</td></tr><tr><td>Interface with animals</td><td>Raise awareness of HCV/RTE to employees Employees are taught not to disturbed/hunt wildlife. Liaison with Jabatan Perhilitan on wildlife encounter/discovery</td></tr><tr><td>Education and awareness</td><td>Educate employees on importance of biodiversity. Encourage research on specific biodiversity To erect signage</td></tr></table>	Action steps	Management Plan	Inspection of HCV	Continuous inspection and recommendation To liaise with related agency	Protection or conservation & monitoring of biodiversity area.	To continuously collaborate with R& D to monitor the status & health of trees	Protection & conservation of mangrove forests area.	To erect signs indicating mangrove forest near coastal areas. To erect signs indicating mangrove forest as HCV areas for conservation.	Rehabilitation & habitat enhancement	To participate in tree planting divers tree species to enhance the surrounding biodiversity.	Interface with animals	Raise awareness of HCV/RTE to employees Employees are taught not to disturbed/hunt wildlife. Liaison with Jabatan Perhilitan on wildlife encounter/discovery	Education and awareness	Educate employees on importance of biodiversity. Encourage research on specific biodiversity To erect signage	
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			No fishing/no hunting/no swimming	
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -	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 9 estates. Hence, the requirement under this indicator does not apply.		Not Applicable

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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2023** for **SOU 9 West POM** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2023** for **SOU 9 West POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct	Extraction	%
CPO	0.59	OER	20.03
PKO	0.59	KER	4.67

Production	t/yr	Land Use	Ha
FFB Process	149,636.78	OP Planted Area	5,041.72
CPO Produced	29,973.08	OP Planted on peat	0.00
PKO Produced	6,984.97	Conservation (forested)	0.00
		Conservation (non-forested)	101.79
		Total	5143.51

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	42416.40	0.52	33724.83	0.50	0.00	0.00	76141.22	0.51
CO ₂ Emission from fertilizer	4749.65	0.06	4320.46	0.06	0.00	0.00	9070.12	0.06
NO ₂ Emission	2505.06	0.03	2337.53	0.03	0.00	0.00	4842.59	0.03
Fuel Consumption	22.02	0.00	16.97	0.00	0.00	0.00	39.00	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-39157.93	-0.48	-31808.54	-0.47	0.00	0.00	-70966.47	-0.47
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	10535.19	0.13	8591.26	0.13	0.00	0.00	19138.80	0.13

**Note: Includes both estates and smallholders*

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	2607.23	0.02
Fuel Consumption	6.37	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	2613.60	0.02

Summary of Kernel Crusher Emission and Credit (if applicable)

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

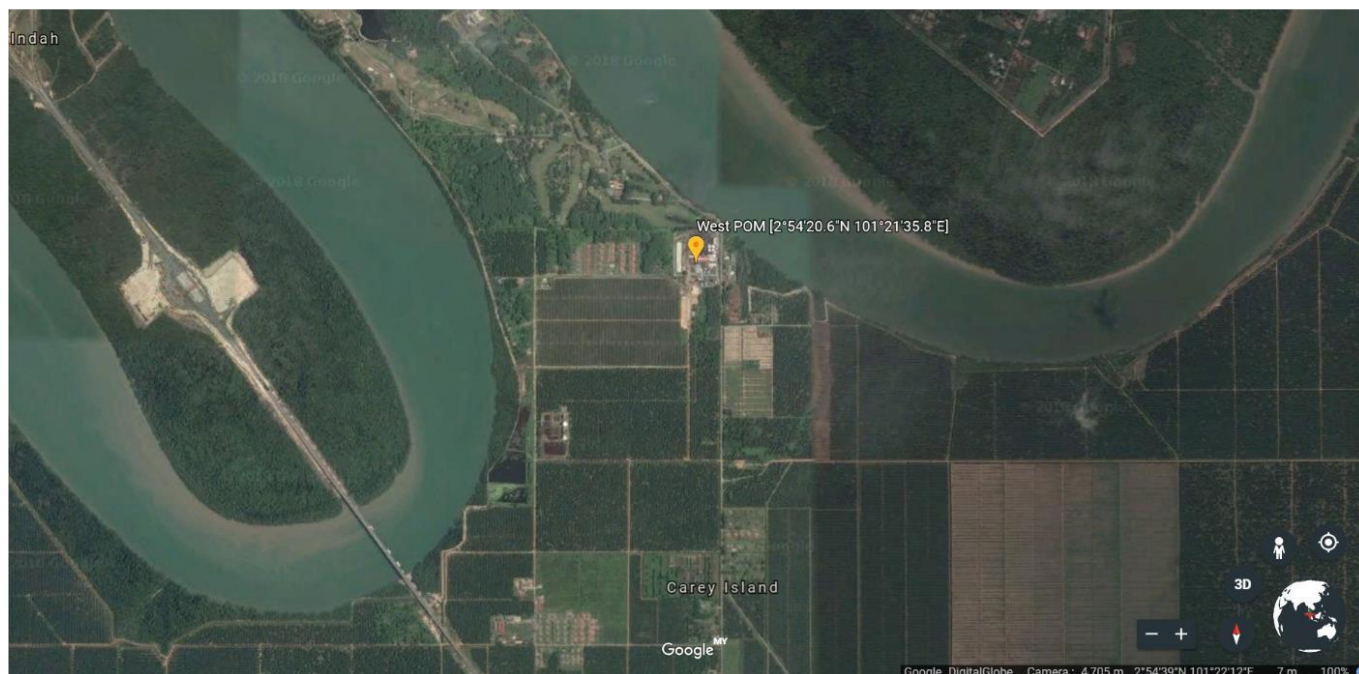
*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100.00

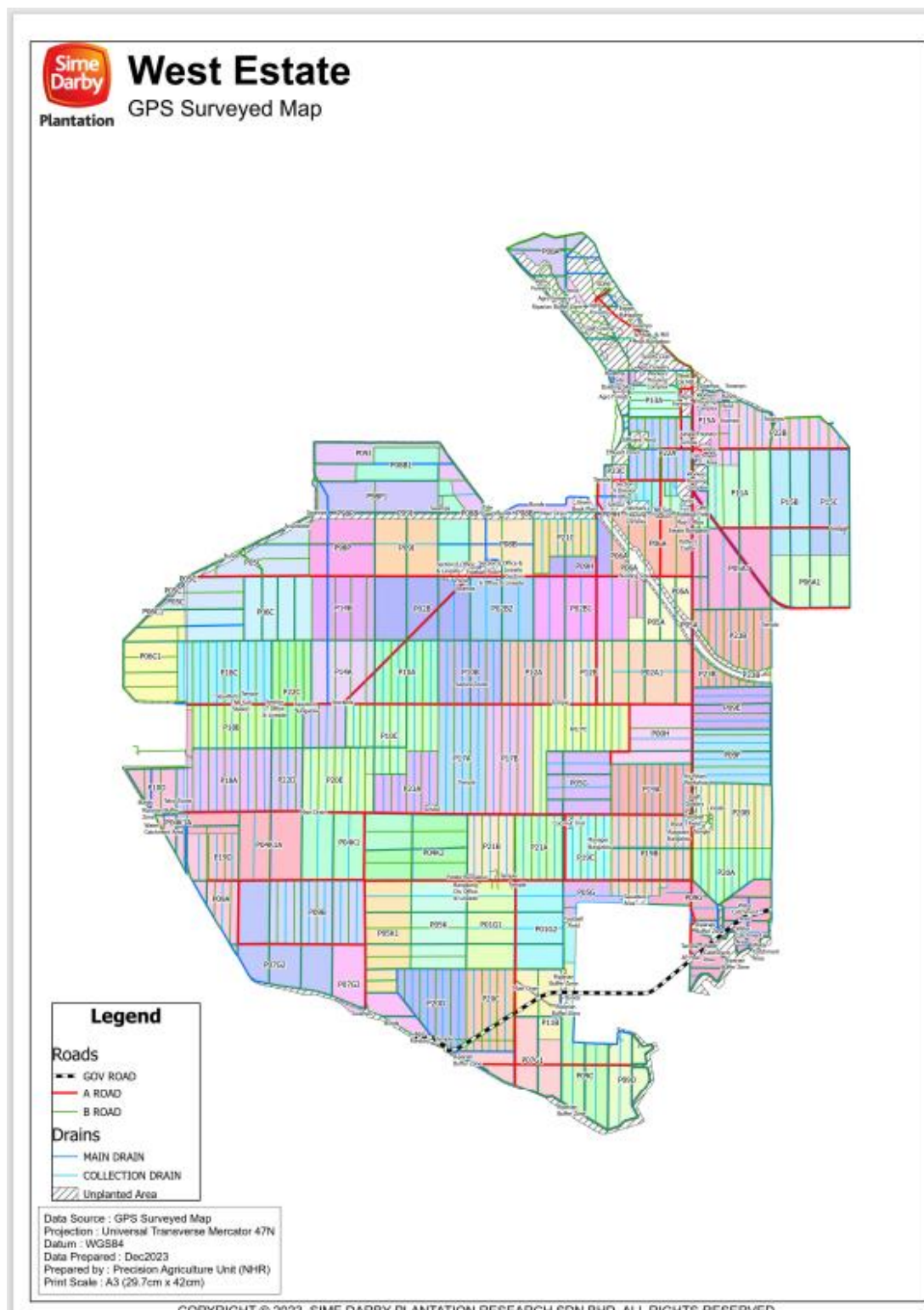
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100.00
Divert to methane captured (flaring) (%)	24.00
Divert to methane captured (energy generation) (%)	76.00

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Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



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			

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			
	N/A								
Total									

Note: * are smallholders sampled in this audit.

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Appendix F: List of Abbreviations

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