

**MALAYSIAN SUSTAINABLE PALM OIL
2nd ANNUAL SURVEILLANCE ASSESSMENT
Public Summary Report**

| Sime Darby Plantation Berhad |
|--|
| Client company Address: Level 3A, Main Block Plantation Tower, No. 2, Jalan P.J.U 1A/7, 47301 Ara Damansara 47301 Petaling Jaya, Selangor, Malaysia |
| Certification Unit: Bukit Benut Palm Oil Mill (SOU 22) & Plantations of SOU 22 including Bukit Benut Estate, CEP Niyor Estate & Lambak Elaeis Estate |
| Location of Certification Unit: KM 12, Jalan Mengkibol, 86009 Kluang, Johor, Malaysia |

Report prepared by:
Valence Shem (Lead Auditor)

Report Number: 9674131

Assessment Conducted by:
BSI Services Malaysia Sdn Bhd,
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Section 1: Executive Summary

| 1.1 Organizational Information and Contact Person | | | |
|---|--|-----------|---|
| MPOB License | Mill: 528154004000 Bukit Benut Estate: 522307002000 CEP Niyor Estate: 508445102000 Lambak Elaeis Estate: 518641002000 | | |
| Company Name | Sime Darby Plantation Berhad [Bukit Benut Palm Oil Mill (SOU 22)] | | |
| Address | KM 12, Jalan Mengkibol, 86009 Kluang, Johor, Malaysia | | |
| Group name if applicable: | Sime Darby Plantation Berhad | | |
| Subsidiary of (if applicable) | N/A | | |
| Contact Person Name | Mdm. Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) | | |
| Website | www.simedarby.com | E-mail | shylaja.vasudevan@simedarbyplantation.com |
| Telephone | 03-78484379 (Head Office) | Facsimile | 03-78484356 (Head Office) |

| 1.2 Certification Information | | | |
|---|---|-------------------------------|-------------|
| Certificate Number | Mill: MSPO 682040 Plantations: MSPO 686845 | | |
| Issue Date | 18/12/2017 | Expiry date | 17/12/2022 |
| Scope of Certification | Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits | | |
| Stage 1 Date | N/A (The certification unit is RSPO certified) | | |
| Stage 2 / Initial Assessment Visit Date (IAV) | 23/10/2017 – 25/10/2017 | | |
| Continuous Assessment Visit Date (CAV) 1 | 21/11/2018 – 23/11/2018 | | |
| Continuous Assessment Visit Date (CAV) 2 | 31/7/2019 – 2/8/2019 | | |
| Continuous Assessment Visit Date (CAV) 3 | N/A | | |
| Continuous Assessment Visit Date (CAV) 4 | N/A | | |
| Other Certifications | | | |
| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date |
| RSPO 591229 | Roundtable Sustainable Palm Oil | BSI Services Malaysia Sdn Bhd | 4/10/2021 |

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| 1.3 Location of Certification Unit | | | |
|--|---|----------------------------------|----------------|
| Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder) | Site Address | GPS Reference of the site office | |
| | | Latitude | Longitude |
| Bukit Benut Palm Oil Mill | KKS Bukit Benut, P.O. Box 513, 86009 Kluang, Johor, Malaysia | 1° 56' 00" N | 103° 20' 28" E |
| Bukit Benut Estate | Ladang Bukit Benut, P.O. Box 513, 86009 Kluang, Johor, Malaysia | 1° 54' 42" N | 103° 21' 54" E |
| CEP Niyor Estate | Ladang CEP Niyor, K.B. No. 514, 86009 Kluang, Johor, Malaysia | 1° 54' 30" N | 103° 16' 22" E |
| Lambak Elaeis Estate | Ladang Lambak/Elaeis, K.B. 510, 86009 Kluang, Johor, Malaysia | 1° 58' 43" N | 103° 19' 08" E |

| 1.4 Plantings & Cycle | | | | | |
|----------------------------------|------------------|---------|---------|---------|---------|
| Estate | Age (Years) - ha | | | | |
| | 0 - 3 | 4 - 10 | 11 - 20 | 21 - 25 | 26 - 30 |
| Bukit Benut Estate | 367.47 | 1017.54 | 805.42 | 347.25 | 0 |
| CEP Niyor Estate | 56.94 | 568.55 | 963.58 | 291.61 | 0 |
| Lambak Estate | 437.77 | 1080.58 | 1483.13 | 241.6 | 0 |
| Total | 862.18 | 2666.67 | 3252.13 | 880.46 | 0 |

| 1.5 FFB Production (Actual) and Projected (tonnage) | | | |
|--|------------------------------|---------------------------|-----------------------------|
| Producer Group | Estimated (Nov 18-Oct 19) | Actual (Nov 18-Jun 19) | Forecast (Nov 19-Oct 20) |
| Lambak Estate | 67,893.79 | 42,009.205 | 64,756.80 |
| CEP Niyor Estate | 42,806.00 | 2,148.470 | 37,963.16 |
| Bukit Benut Estate | 52,490.00 | 32,971.035 | 49,297.60 |
| CEP Renggam | 0 | 5,801.005 | 0 |
| Kulai | 0 | 40.300 | 0 |
| Layang | 0 | 15.470 | 0 |
| Seri Pulai | 0 | 24.860 | 0 |
| Cenas | 0 | 146.420 | 0 |
| Sembrong | 0 | 34.860 | 0 |
| TDI | 0 | 1346.260 | 0 |
| Ulu Remis Est | 0 | 180.220 | 0 |
| Ulu Remis Mill* | 0 | 137.260 | 0 |

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| | | | |
|--------------|------------|-----------|-----------|
| Total | 163,189.79 | 84855.365 | 152017.56 |
|--------------|------------|-----------|-----------|

| 1.6 Certified CPO / PK Tonnage | | | |
|---------------------------------------|--------------------------------------|-----------------------------------|-------------------------------------|
| | Estimated (Nov 18-Oct 19) | Actual (Nov 18-Jun 19) | Forecast (Nov 19-Oct 20) |
| Mill Capacity: 20 MT/hr | FFB received (mt) | FFB received (mt) | FFB received (mt) |
| | 163,189.79 | 84,855.365 | 152,017.56 |
| SCC Model: IP | FFB Processed (mt) | FFB Processed (mt) | FFB Processed (mt) |
| | 119,650.071 | 84,886.746 | 122,536.91 |
| | CPO (OER: 21.15%) (mt) | CPO (OER: 20.99%) (mt) | CPO (OER: 20.20%) (mt) |
| | 25,305.99 | 17,820.566 | 24,752.456 |
| | PK (KER: 5.48%) (mt) | PK (KER: 5.37%) (mt) | PK (KER: 5.50%) (mt) |
| | 6,556.14 | 4,555.832 | 6,739.53 |

** The balance carried/brought forward has to be accounted in.

| 1.7 Certified Area | | | | | |
|---------------------------|---|---------------------|--|----------------------------|-------------------------|
| Estate | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted |
| Bukit Benut Estate | 2,537.68 | 24.18 | 237.92 | 2,799.78 | 90.64 |
| CEP Niyor Estate | ¹ 1,880.68 | ¹ 6.11 | ¹ 78.783 | 1,965.573 | 95.68 |
| Lambak Estate | ¹ 3,243.08 | ¹ 2.65 | ¹ 494.43 | 3740.16 | 86.71 |
| TOTAL | 7,661.44 | 32.94 | 811.133 | 8,505.513 | 90.08 |

Note: ¹The figures given in the previous assessment report were inaccurate. Hence the difference.

1.8 Details of Certification Assessment Scope and Certification Recommendation:

BSI Services Malaysia Sdn Bhd has conducted the Annual Surveillance Assessment of Sime Darby Bukit Benut SOU 22 located at KM 12, Jalan Mengkibol, 86009 Kluang, Johor, Malaysia. comprising 1 mill, 3 estates and infrastructures.

The onsite assessment was conducted to assess the compliance of the certification unit against the MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders and MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill.

The assessment is a combined assessment for the mill and the group of estates that is supplying to the mill. However the assessment criteria for the mill and the estates were separated following to the required standards. The certification assessment scope is Bukit Benut Palm Oil Mill SOU 22 and Bukit Benut SOU 22 Estates which acts as the group manager for Bukit Benut Estate, CEP Niyor Estate and Lambak Elaeis Estate. This report is the combined report for Bukit Benut Palm Oil Mill SOU 22 and Bukit Benut SOU 22 Estates.

The onsite assessment was conducted on 31/7 – 2/8/2019.

Based on the assessment result, Sime Darby Bukit Benut SOU 22 complies with the MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders and MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill and recommended for certification to be continued.

Section 2: Assessment Process

Certification Body:

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BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 31/7 – 2/8/2019. The audit programme is included as Appendix A. The approach to the audit was to treat the Bukit Benut Palm Oil Mill as an MSP0 Certification Unit and Bukit Benut SOU 22 Estates as another MSP0 Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

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. MS 2530-3:2013 or MS 2530-4:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The estates or smallholders sample were determined based on formula $S = r\sqrt{n}$ where n is the number of estates while when applicable, the smallholders sample were determined following the MSP0 Certification Requirement. The sampling of smallholders were based on the formula $(r\sqrt{n})$; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix C.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the MSP0 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 Appendix B.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment are detailed in Section 4.2.

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This report is structured to provide a summary of assessment finding as attached in the Section 3. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

This report was externally reviewed by MSPO approved Peer Reviewer prior to certification decision by BSI.

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

| 1. Assessment Program | | | | | |
|--|-----------------------------------|---------------------------|---------------------------|---------------------------|---------------------------|
| Name (Mill / Plantation / Group smallholders) | Year 1 (Certification) | Year 2 (ASA 1) | Year 3 (ASA 2) | Year 4 (ASA 3) | Year 5 (ASA 4) |
| Bukit Benut Palm Oil Mill | ✓ | ✓ | ✓ | ✓ | ✓ |
| Bukit Benut Estate | ✓ | ✓ | | ✓ | ✓ |
| CEP Niyor Estate | | ✓ | ✓ | | |
| Lambak Elaeis Estate | ✓ | | ✓ | ✓ | ✓ |

Tentative Date of Next Visit: July 27, 2020 - January 29, 2020

Total No. of Mandays: 6

BSI Assessment Team:

Valence Shem - Lead Assessor

He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, environmental and biodiversity and best practices. Able to communicate in Bahasa Malaysia and English.

Amir Bahari – Team Member

He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. 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 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and estates best practices, workers consultation and occupational safety & health. He is fluent in both verbal/written in Bahasa Malaysia and English.

Accompanying Persons: N/A

Section 3: Assessment Findings

3.1 Details of audit results

This assessment has been assessed using the following RSPO normative requirements. The assessment details are provided in Appendix A.

- MSPO MS 2530-2:2013 – General Principles for Independent Smallholders
- MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders
- MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills

3.2 Details of Nonconformities and Opportunity for improvement

During the Certification Assessment there were zero (0) nonconformity raised and 2 OFIs.

| Opportunity for Improvement | | |
|-----------------------------|---|-------------------------|
| Ref | Area/Process: Estates | Clause: 4.4.5.11 |
| NC ID from eReport | 1769982-201905-I1 | |
| Requirements | In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation | |
| Objective Evidence | The weekly workers quarters inspection report can be further improved by reporting more accurately on some criteria such as illegal wiring. | |

| Opportunity for Improvement | | |
|-----------------------------|--|------------------------|
| Ref | Area/Process: Mill | Clause: 4.4.5.7 |
| NC ID from eReport | 1769982-201905-I2 | |
| Requirements | The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. | |
| Objective Evidence | The recording of overtime based on attendance punch card at Bukit Benut POM can be further improved and can be reflected in the pay slips. | |

| Noteworthy Positive Comments | |
|------------------------------|--|
| 1 | Good relationship being maintained with surrounding communities. |
| 2 | Mill has continued maximized the use of renewable energy by consuming fibre and shell which produced through internal process. |
| 3 | Good housekeeping at the facilities such as workshops, chemical stores and scheduled wastes stores. |

3.3 Status of Nonconformities Previously Identified and OFI

NA. There was no non-conformity raised in the previous assessment.

3.4 Issues Raised by Stakeholders

| IS # | Description |
|------|--|
| 1 | Issues <u>Sundry Shops</u> No issue. Contract agreements were fully adhered by both parties. |
| | Management Responses Continue with the good relationship. |
| | Audit Team Findings None |
| 2 | Issues <u>SJK(T) Ladang Lambak</u> No issue. Lambak Estate continues to contribute supply of electricity & water and minor maintenance to the school. Apart from that facilities such as hall and football field are also allowed to be used. |
| | Management Responses Continue with the good relationship. |
| | Audit Team Findings None |
| 3 | Issues <u>Kampung Suria</u> No issue. Good relationship between villagers and estate. |
| | Management Responses Continue with the good relationship. |
| | Audit Team Findings None |

3.5 Summary of the Nonconformities and Status

| CAR Ref. | CLASS | ISSUED | STATUS |
|-------------|-------|--------|--------|
| NA – no NCR | | | |

3.6 Summary of the findings by Principles and Criteria

MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|--|------------|
| 4.1 Principle 1: Management commitment & responsibility | | | |
| Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy | | | |
| 4.1.1.1 | A policy for the implementation of MSPO shall be established. - Major compliance - | The internal memo from Mr Tan Men Kon, Head of Plantation Sustainability & Quality Management documented the commitment Sime Darby towards MSPO implementation. The internal memo dated 8 th September 2017 was issued to all Estates and Mills. The commitment is to implement and certified with MSPO by December 2017. | Yes |
| 4.1.1.2 | The policy shall also emphasize commitment to continual improvement. - Major compliance - | The continual improvement commitment is documented in the following Management & Operation Policies: a) Quality Management Policy dated January 2015 b) Lean Six Sigma Policy dated January 2015 c) Quality Policy dated January 2015 The commitments are made by the Managing Director Sime Darby Plantation Berhad. | Yes |
| Criterion 4.1.2 – Internal Audit | | | |
| 4.1.2.1 | Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. | The Internal Audit Procedure (SD/SDP/PSQM/IAP) dated 01/05/2015 documented the process to conduct internal audit. The internal audit checklist is available to cover all the required MSPO requirements. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|---|------------|
| | - Major compliance - | <p>This is the initial certification of MSPO. The internal audit schedule for 2019 has been planned and communicated by Regional SQM to all central Southern Region Estates and Mills.</p> <p><i>1) Lambak Elaies Estate</i> An internal audit for sustainable palm oil was conducted on 26/4/19. Covering all the MSPO MS2530 Part 3 elements. There were 2 major and 5 minor raise. In addition 8 OFI were issued. The root causes for the NCRs were clearly identified;</p> <ul style="list-style-type: none"> a) No 9 Minor – Stakeholders meeting and list – <i>lack of update.</i> b) No 13 Minor – gender meeting <i>not conducted</i> c) No 15 Minor - Records of pay by contractors <i>not fully monitored</i> <p><i>2) CEP Niyor Estate</i> The recent audit was on 25/4/19 performed by PSQM personnel. A total of 2 major and 1 minor NCRs were raised. 6 OFI were also issued. All elements in the MSPO 1MS2530 Part 3 were covered.</p> <ul style="list-style-type: none"> a) Inadequate PPE for workers b) Consent of workers for FW & PH work. c) Extension, employment contracts not updated | |
| 4.1.2.2 | <p>The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.</p> <p>- Major compliance -</p> | <p>This is available under internal audit procedure Document ID: SD/SDP/PSQM/IAP. The latest revision being dated on 01/9/2017.</p> <p>The internal audit reports dated 25/4/19 and 26/4/19 for <i>CEP Niyor</i> and <i>Lambak Elaies</i> Estates respectively were sighted. The auditees responded by including the root cause analysis and corrective action plan. Details of findings as per 4.1.2.1 above. The auditor has also complied with the documented procedure through issuance of audit</p> | Yes |

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| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|---|------------|
| | | plan to the operating units dated 10/4/19. This audit notification was sighted and verified. | |
| 4.1.2.3 | Report shall be made available to the management for their review. - Major compliance - | Reports are made available and retained for min 10 years. All reports are circulated to the estate management, Regional Office and Sime Darby Plantation HQ relevant personnel. There is a monthly SQM meeting at HQ level to review the reports' findings and performance raised in both internal and external audit. The outcome was also discussed at Regional Office. | Yes |
| Criterion 4.1.3 – Management Review | | | |
| 4.1.3.1 | The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance - | <i>Lambak Elaeis Estate</i> held their management review 26/4/19 chaired by The Manager. <i>CEP Niyor Estate</i> in parallel had a similar meeting on 8/5/19. Attendance from both estates executives and staff were noted and the members discussed issues relating to the MSPO preparation; <ul style="list-style-type: none"> a) Internal audit findings b) Appointment of PIC for the NCR raised c) Scheduled waste management d) Training on Company's Policies e) Water sampling f) Non-renewable fuel monitoring The meeting made a conclusive statement on the suitability, effectiveness of the MSPO implementation. | Yes |

| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|-----------------------------|--|--|--|---------|--------|---|--|----------|---|--|----------|---|--|----------|-------------------------|--|--|--|---------|--------|---|--|----------|------------|
| Criterion 4.1.4 – Continual Improvement | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.1.4.1 The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance - | <p>Projects in relation to the continual improvement are made through allocation in Capital Expenditure. For both the management provided the following CAPEX for the upgrading of building / infrastructure. Such projects has attributed positively to the social and environmental of the estate. Among others are;</p> <table border="1" data-bbox="1088 754 1872 1106"> <thead> <tr> <th colspan="3" data-bbox="1088 754 1872 802"><i>Lambak Elaeis Estate</i></th> </tr> <tr> <th data-bbox="1088 802 1137 850"></th> <th data-bbox="1137 802 1738 850">Details</th> <th data-bbox="1738 802 1872 850">Period</th> </tr> </thead> <tbody> <tr> <td data-bbox="1088 850 1137 954">1</td> <td data-bbox="1137 850 1738 954">Introduction of fertilizer application using FM3 Badang on both and flat areas 4 units being engaged. 1 man performed work at 80 bags at 16 ha /man day.</td> <td data-bbox="1738 850 1872 954">Jan 2019</td> </tr> <tr> <td data-bbox="1088 954 1137 1034">2</td> <td data-bbox="1137 954 1738 1034">Circle raking using <i>Zenoeh</i> blower at cost 2500 /units since 2017. Productivity 4-5 ha/man days.</td> <td data-bbox="1738 954 1872 1034">Jan 2017</td> </tr> <tr> <td data-bbox="1088 1034 1137 1106">3</td> <td data-bbox="1137 1034 1738 1106">To reduce P&D issue through cultivation of <i>euphobia heterophyly</i> at 6.6.2. 14 dm: ha</td> <td data-bbox="1738 1034 1872 1106">Jan 2018</td> </tr> </tbody> </table> <table border="1" data-bbox="1088 1201 1872 1398"> <thead> <tr> <th colspan="3" data-bbox="1088 1201 1872 1249"><i>CEP Niyor Estate</i></th> </tr> <tr> <th data-bbox="1088 1249 1137 1297"></th> <th data-bbox="1137 1249 1738 1297">Details</th> <th data-bbox="1738 1249 1872 1297">Period</th> </tr> </thead> <tbody> <tr> <td data-bbox="1088 1297 1137 1398">1</td> <td data-bbox="1137 1297 1738 1398">Introduction of fertilizer application using FM3 Badang on both and flat areas 4 units being engaged. 1 man performed work at 80 bags at 16 ha /man day.</td> <td data-bbox="1738 1297 1872 1398">Jan 2019</td> </tr> </tbody> </table> | <i>Lambak Elaeis Estate</i> | | | | Details | Period | 1 | Introduction of fertilizer application using FM3 Badang on both and flat areas 4 units being engaged. 1 man performed work at 80 bags at 16 ha /man day. | Jan 2019 | 2 | Circle raking using <i>Zenoeh</i> blower at cost 2500 /units since 2017. Productivity 4-5 ha/man days. | Jan 2017 | 3 | To reduce P&D issue through cultivation of <i>euphobia heterophyly</i> at 6.6.2. 14 dm: ha | Jan 2018 | <i>CEP Niyor Estate</i> | | | | Details | Period | 1 | Introduction of fertilizer application using FM3 Badang on both and flat areas 4 units being engaged. 1 man performed work at 80 bags at 16 ha /man day. | Jan 2019 | <p>Yes</p> |
| <i>Lambak Elaeis Estate</i> | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Details | Period | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Introduction of fertilizer application using FM3 Badang on both and flat areas 4 units being engaged. 1 man performed work at 80 bags at 16 ha /man day. | Jan 2019 | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Circle raking using <i>Zenoeh</i> blower at cost 2500 /units since 2017. Productivity 4-5 ha/man days. | Jan 2017 | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | To reduce P&D issue through cultivation of <i>euphobia heterophyly</i> at 6.6.2. 14 dm: ha | Jan 2018 | | | | | | | | | | | | | | | | | | | | | | | | |
| <i>CEP Niyor Estate</i> | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Details | Period | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Introduction of fertilizer application using FM3 Badang on both and flat areas 4 units being engaged. 1 man performed work at 80 bags at 16 ha /man day. | Jan 2019 | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | | Compliance |
|---|--|--|--|----------|------------|
| | | 2 | Circle raking using <i>Zenoeh</i> blower at cost 2500 /units since 2017. Productivity 4-5 ha/man days. | Jan 2017 | |
| | | 3 | To reduce P&D issue through cultivation of <i>euphobia heterophyly</i> at 6.6.2. 14 dm: ha | Jan 18 | |
| | | 4 | Upgrading worker quarters of 10 units | 2022 | |
| | | 5 | Upgrading of executive bungalow 2 units | 2023 | |
| 4.1.4.2 | The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. - Major compliance - | <p>The management continuously reviewed the estates performance and work method for a continual improvement to achieve better results. Among other was the <i>Yield Enhancement Program</i>. Initiative and practices among others include the following in both estates.</p> <p>To reduce P&D issue through cultivation additional beneficial plant species - <i>euphobia heterophyly</i> at 6.6.2. at ratio of 14 dm: ha.</p> | | | Yes |
| 4.1.4.3 | An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance - | <p>Where new technology or systems are introduced, awareness briefings are provided to the employees at all levels prior to the implementation. This is evidenced via the Regional & SOU meetings and the training plan for Financial Year. The training identified including operations, understanding of MSPO/RSPO requirements, human rights, company policies, health and safety etc. The FY 2019 OPEX budget has included training budget and operations improvement including environmental improvement, worker welfare, OHS etc. Interview with workers confirmed trainings are provided by company on regular basis.</p> | | | Yes |
| 4.2 Principle 2: Transparency | | | | | |
| Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|---|------------|
| 4.2.1.1 | <p>The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.</p> <p>- Major compliance -</p> | <p>Both visited estates have maintained records of requests and responses. Land titles/user rights, Safety and health plans, plans and impact assessments relating to environmental and social, plans for pollution prevention, records of complaints & grievances, plans for continuous improvement are accessible upon request by the stakeholders.</p> <p>Most of the stakeholders were requested for assistance from the management such as to get permission for vehicles to enter the estate compound for festival celebration, request to use the land in estate for festival celebration and etc.</p> | Yes |
| 4.2.1.2 | <p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p> | <p>The company has developed a procedure on Documentation and Communication under Section 3, version: 1, year 2008 where the information on sustainable activities will be made publicly available to the general public through Annual Reports, circulars, agreements, Sime Darby website and other publications. Copies of the document such as impact assessment reports and monitoring plans relating to environmental and social, pollution prevention plans, records of complaints and grievances were available on request.</p> | Yes |
| Criterion 4.2.2 – Transparent method of communication and consultation | | | |
| 4.2.2.1 | <p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p> | <p>SDPB has developed a documented procedure in Sustainable Plantation Management System on handling social issues, Appendix 5, Version 1, and Issue No.1, dated 01/4/2008. The procedure has detailing the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner.</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---------------------------------------|--|--|------------|
| 4.2.2.2 | A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance - | The estate’s assistant managers were appointed to be the overall in charge for social issue and responsible for communication and consultation with the local communities and other interested parties. The roles and responsibility were also stated in the appointment letter. The appointment has been communicated internally by memo and externally through stakeholder consultation. | Yes |
| 4.2.2.3 | List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance - | Lists of stakeholders were made available at the visited estates and last updated in June 2019. Among the stakeholders included in the lists were government agencies, contractors, suppliers, surrounding communities and NGOs. The last consultation was conducted on 4/4/2019 which covered all the operating units in SOU22. Minutes of meeting was available for verification. | Yes |
| Criterion 4.2.3 – Traceability | | | |
| 4.2.3.1 | The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). - Major compliance - | The implementation of traceability is guided by Sustainable Plantation Management System, Appendix 15, SOP for Sustainable Supply Chain and Traceability, ver. 2, issue 5, dated April 2019. The procedure also covers the traceability implementation for the other certification schemes such RSPO and ISCC. | Yes |
| 4.2.3.2 | The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance - | The regular inspection on compliance with the traceability system was mainly done through internal audit as mentioned in Criterion 4.1.2. | Yes |
| 4.2.3.3 | The management should identify and assign suitable employees to implement and maintain the traceability system. | Based on the company’s traceability procedure Section 4.1, the overall personal in charge for the traceability is the Head of Operating Unit, | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance | | |
|--|---|---|-----------------------------|--|-----|
| | - Minor compliance - | i.e. in this case, the Estate Managers. The responsibility is stated in the job description. | | | |
| 4.2.3.4 | Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance - | The records of delivery of FFB to POM were verified. The dispatch of the will be entered into the Sime Weight System. The delivery records related to traceability shall be maintained for 3 to 10 years according to the SPMS SOP for Sustainable Supply Chain Traceability, dated April 2019 Clause 5.4. | Yes | | |
| 4.3 Principle 3: Compliance to legal requirements | | | | | |
| Criterion 4.3.1 – Regulatory requirements | | | | | |
| 4.3.1.1 | All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance - | <p>A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU22. GSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance.</p> <p>a) Refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: b) Procedure for Legal and Other Requirements dated 10 December 2008.</p> <p>The following compliance to the legislative requirement necessary for both estates among others are;</p> <table border="1" data-bbox="1086 1324 1870 1364"> <tr> <td><i>Lambak Elaies Estate</i></td> <td></td> </tr> </table> | <i>Lambak Elaies Estate</i> | | Yes |
| <i>Lambak Elaies Estate</i> | | | | | |

| Criterion / Indicator | | Assessment Findings | | | | Compliance |
|-----------------------|--|--|-----------|--|----------|------------|
| | | | Authority | Details | Validity | |
| | | 1 | MPOB | Licence No 518641002000 | 29/2/20 | |
| | | 2 | KPDNK | Permit no J038042-Diesel storage | 29/6/20 | |
| | | 3 | DOSH | Air Compressor PMT JH 11573 | 19/9/19 | |
| | | 4 | DOE | No 002076-Kualiti Alam SW 404 disposal | 30/4/20 | |
| | | <i>CEP Niyor Estate</i> | | | | |
| | | | Authority | Details | Validity | |
| | | 1 | DOSH | Air Compressor JH PMT 82460 | 07/2/20 | |
| | | 2 | MPOB | Licence no 508445102000 | 31/3/20 | |
| | | 3 | KPDNK | Permit no J036225-Diesel storage | 12/8/19 | |
| | | 4 | JTK | Permit Ptg Gaji – PP3/29/095/2004 | 01/8/04 | |
| 4.3.1.2 | The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance - | Both the estates have identified and documented their legal register with written information on legal requirements applicable to their operation. The record titled " <i>Legal Requirement Register</i> " File 2 (F23) no QSHE/04/5.2.4. GSQM Department, based at Head Office is responsible to track changes in the law and the information was disseminated to all of its plantations and mills. The identified legal among others includes; <ul style="list-style-type: none"> a) Pesticides Act 1974 and Regulations, b) Environmental Quality Act and Regulations 1974, c) Factories and Machinery Act and Regulations, 1967 d) Weights And Measures Regulations 1981 e) Electricity Regulations 1994 | | | | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|--|------------|
| | | <ul style="list-style-type: none"> f) Immigration Act 1959 g) Occupational Safety and Health Act 1994 h) Employment Act 1955 i) Industrial Relations Act 1967 j) Children and Young Persons (Employment) Act 1966 k) MPOB Regulations (Licensing) 2005, EQ (Prescribed Premise) (Crude Palm Oil) Regulations 1977 l) Industrial Code of Practice for Confined Space 2010. m) MPOB licensing Regulation 2005. <p>The acts and its regulations were evaluated for compliance annually. No new laws /regulations being introduced since the last audit. The documented procedure has been established and implemented; reference;</p> <ul style="list-style-type: none"> a) Estate/Mill Quality Management System, Level 2: b) Standard Operating Manual, Appendix 5.2.4: c) Procedure for Legal and Other Requirements dated 10 December 2008. <p>All operating units possessed individual Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements.</p> | |
| 4.3.1.3 | <p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p> | <p>A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units Bukit Benut CU. GSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance.</p> <p>Reference document;</p> <ul style="list-style-type: none"> a) Estate/Mill Quality Management System | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| | | b) Level 2: Standard Operating Manual c) Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008. The latest revision on the LORR was made in May 19 on the following changes; <i>Noise Regulations 2019 – revocation of noise exposure 1989</i> | |
| 4.3.1.4 | The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. - Minor compliance - | GSQM department, which is based in Kuala Lumpur, is responsible for tracking any changes to the Acts and Regulations. In addition, the CEO/RGM of SDP Southern Region also played a role in disseminating new Acts & Regulations to all the mills and estates in the Region. <ul style="list-style-type: none"> a) This was made via communication with the publisher of the documents. b) This mechanism was outlined in its procedure. c) The updating of the legal register is made on a periodical basis. d) Changes in the legal register if any are communicated to the respective CU/SOUs The CU had entirely adopted the SDPB established documented system for identifying, tracking, accessing and updating the legal requirements. It had ensured that all applicable legal requirements pertaining to MSPO are established, implemented and maintained. Among others the identified applicable laws and regulations relevant to its operations included the; <ul style="list-style-type: none"> a) Environmental Quality Act 1974 and its Regulations, b) Factories and Machinery Act 1967 and its Regulations, c) Occupational Safety and Health Act 1994 and its Regulations, d) Pesticides Act, 1974, e) Worker’s Minimum Standards of Housing and Amenities Act, 1990 | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | |
|---|--|---|----------------------|--------|----------|--------------------|---|---------------|--------|--------------|---|-----------|-------|----------|---|-----------|--------|----------------------|-----|
| Criterion 4.3.2 – Lands use rights | | | | | | | | | | | | | | | | | | | |
| 4.3.2.1 | The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance - | The estates have planted the lands with oil palm. This is in line with the conditions stipulated in the land titles i.e. to be planted with rubber/oil palm/orchard. | Yes | | | | | | | | | | | | | | | | |
| 4.3.2.2 | The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance - | Lambak Elaeis Estate: 20 land titles with 21 lots (#H.S.(D): 41657 has 2 lots i.e. # PTD 43255 & PTD 43256 which area is 223.9528 Ha & 10.3004 Ha respectively), total 3,740.1405 Ha. CEP Niyor Estate: 21 land titles with a total area of 1,965.573 Ha. | Yes | | | | | | | | | | | | | | | | |
| 4.3.2.3 | Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance - | The estate has installed boundary markers. During the field visit at the estates it was confirmed that they have maintained boundary markers by red/white pole. The areas visited and verified among others as follows; <table border="1" data-bbox="1086 1098 1794 1273"> <thead> <tr> <th></th> <th>Estate</th> <th>Location</th> <th>Boundary neighbors</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Lambak Elaeis</td> <td>P2001A</td> <td>Smallholders</td> </tr> <tr> <td>2</td> <td>CEP Niyor</td> <td>P2002</td> <td>Kg Niyor</td> </tr> <tr> <td>3</td> <td>CEP Niyor</td> <td>P2005A</td> <td>Chin Bee Plantations</td> </tr> </tbody> </table> | | Estate | Location | Boundary neighbors | 1 | Lambak Elaeis | P2001A | Smallholders | 2 | CEP Niyor | P2002 | Kg Niyor | 3 | CEP Niyor | P2005A | Chin Bee Plantations | Yes |
| | Estate | Location | Boundary neighbors | | | | | | | | | | | | | | | | |
| 1 | Lambak Elaeis | P2001A | Smallholders | | | | | | | | | | | | | | | | |
| 2 | CEP Niyor | P2002 | Kg Niyor | | | | | | | | | | | | | | | | |
| 3 | CEP Niyor | P2005A | Chin Bee Plantations | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|--|------------|
| 4.3.2.4 | Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance - | There was no land disputes noted during the audit at both visited estates as the company has the legal ownership documents which is under the Sime Darby Plantation Sdn. Bhd. | Yes |
| Criterion 4.3.3 – Customary rights | | | |
| 4.3.3.1 | Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance - | There is no customary land or negotiated agreements within the SOU 22 Bukit Benut land area. | NA |
| 4.3.3.2 | Maps of an appropriate scale showing extent of recognized customary rights land, if any, should be made available. - Minor compliance - | There is no customary land or negotiated agreements within the SOU 22 Bukit Benut land area. | NA |
| 4.3.3.3 | Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance - | There is no customary land or negotiated agreements within the SOU 22 Bukit Benut land area. | NA |
| 4.4 Principle 4: Social responsibility, health, safety and employment condition | | | |
| Criterion 4.4.1: Social Impact Assessment (SIA) | | | |
| 4.4.1.1 | Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. | The Social Impact Assessment for SOU22 Bukit Benut for all operating units (Bukit Benut POM, Bukit Benut Estate, CEP Niyor Estate Lambak Elaeis Estate) was conducted internally by the Plantation Sustainable | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|---|------------|
| | - Minor compliance – | and Quality Management (PSQM) Team [now known as Group Sustainable and Quality Management (GSQM)]. The last SIA was conducted on 16-19/5/2016. The recommendation from the SIA report was transferred to action plans which have has the information about Areas of Concerns/Key Findings, Action Plan, Status PIC and Completion Date. | |
| Criterion 4.4.2: Complaints and grievances | | | |
| 4.4.2.1 | A system for dealing with complaints and grievances shall be established and documented. - Major compliance - | A documented dispute resolution procedure is available in Mill and Estate Quality Management System Manual which is effective, timely, appropriate and open to any affected parties. The complaint and grievances is open to effected parties including internal and external stakeholders. The time frame to deal with external communications should be within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation, for communication required investigation. | Yes |
| 4.4.2.2 | The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance - | The complaint and grievances are open to affected parties which includes internal and external stakeholders. The time to process the complaints or grievances is 2 weeks. Mostly the complaints received were about housing maintenance & repair by the employees. They were recorded in a log book which has the information about date, complainant, details of complain and status. There was no complaint from external stakeholders ever since the last assessment. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|---|------------|
| 4.4.2.3 | A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance - | The operating unit managements have maintained Complaint Book and Houses Repair Record to receive any complaints or grievances from stakeholders. The complaints lodged related to housing repair were resolved accordingly and it was acknowledged by the complaints after the action has been taken. | Yes |
| 4.4.2.4 | Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance - | Employees and surrounding communities were made aware on the complaints and grievances through various ways such as meeting, training and briefing. Meetings between the operating units and their relevant stakeholders were conducted from time to time. Minutes of meeting were available for verification e.g. Lambak Elaeis dated 23/7/2019 and CEP Niyor dated 25/6/2019. | Yes |
| 4.4.2.5 | Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance - | All the visited estates maintained their records of complaint in a complain file. Records for more than 24 months ago were still kept in the file. | Yes |
| Criterion 4.4.3: Commitment to contribute to local sustainable development | | | |
| 4.4.3.1 | Growers should contribute to local development in consultation with the local communities. - Minor compliance - | Both visited estates have made contribution to local development. Among the contributions observed were grass cutting at SJK (T), supplying manpower to do maintenance at school, allowing stakeholders to use the sport facilities such as football field upon request, to name a few. | Yes |
| Criterion 4.4.4: Employees safety and health | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|--|------------|
| 4.4.4.1 | An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance - | The Group Occupational Safety & Health Management Policy had been established and implemented for all mills and estates. The policy was signed by the Managing Director of Sime Darby Plantation on January 2015 and displayed prominently on notice boards in English and local language Bahasa <i>Malaysia</i> . The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH Manager from Head Office. Included in the policy among others; <ul style="list-style-type: none"> a) The commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors. b) During interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the policy. | Yes |
| 4.4.4.2 | The occupational safety and health plan shall cover the following: <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as | Briefings to employees are made through town hall session. Sighted <i>Lambak Elaeis Estate</i> town hall session 7.0 held on 11/4/19. During the town hall session, subjects on safety policies, road safety, zero harm, accident history and precautionary measures, dialogue and ' <i>ikrar pekerja</i> ' were briefed and shown in slides presentation to the employees. Similar program was held in <i>CEP Niyor Estate</i> organised by RSQM personnel on 05/4/19. The ' <i>ikrar pekerja</i> ' was sighted. Content includes among others to prioritise safety, execute work safely, adhere all safety rules and regulations and to target zero accident. Apart from specific session, safety policy and targets were available on display board printed in both English & <i>Bahasa Malaysia</i> . Both estates had identified and reviewed in May 19 significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) | Yes |

| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|------------|--------------------|--|--|---|------------------------------|---|--------------------|---|--------------------|---|------------|---|----------------|---|------------|---|-------------------------------------|---|---------------|---|------------------|----|-------------|--|
| <p>identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> | <p>records, as well as CHRA reports were verified during the assessment. At the estates, among the HIRARC covered activities are;</p> <table border="1" data-bbox="1088 571 1816 882"> <thead> <tr> <th></th> <th>Activity</th> <th></th> <th></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pest & Disease – Rat Baiting</td> <td>6</td> <td>Workshop Operation</td> </tr> <tr> <td>2</td> <td>Weeding – Spraying</td> <td>7</td> <td>Harvesting</td> </tr> <tr> <td>3</td> <td>FFB collection</td> <td>8</td> <td>Replanting</td> </tr> <tr> <td>4</td> <td>Pruning – Cutting & Stacking Fronds</td> <td>9</td> <td>Leaf sampling</td> </tr> <tr> <td>5</td> <td>Office operation</td> <td>10</td> <td>Weighbridge</td> </tr> </tbody> </table> <p>Full review for the HIRARC was conducted by the ESH committee and no major changes were observed in term of hierarchy to determine appropriate control measures. They are made on annual basis or whenever a situation deemed necessary in event of accident or new machinery / work process. All HIRARC prepared were adequate to address any situation of the risk management. All HIRARC were verified and approved accordingly. HIRARC for CEPN was last reviewed on 01/4/19 relating to pruning SOP. Review of Lee to include the following changes;</p> <ul style="list-style-type: none"> - Harvesting sharpening of harvesting sickle - Gardening cuts & bruises by knife | | Activity | | | 1 | Pest & Disease – Rat Baiting | 6 | Workshop Operation | 2 | Weeding – Spraying | 7 | Harvesting | 3 | FFB collection | 8 | Replanting | 4 | Pruning – Cutting & Stacking Fronds | 9 | Leaf sampling | 5 | Office operation | 10 | Weighbridge | |
| | Activity | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Pest & Disease – Rat Baiting | 6 | Workshop Operation | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Weeding – Spraying | 7 | Harvesting | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | FFB collection | 8 | Replanting | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Pruning – Cutting & Stacking Fronds | 9 | Leaf sampling | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Office operation | 10 | Weighbridge | | | | | | | | | | | | | | | | | | | | | | | |

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| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|----------------------|--|------------------|--|--|--|--|------|---------|-----------|---|----------|---------------------------|--------|---|--------|----------------|----|---|---------|----------------------------|----|---|---------|--------------------------------|----|---|---------|--------------------|----|---|---------|----------------|---|---|---------|------------------------|----|---|---------|-----------------|---|---|--------|-----------------------|--------|----------------------|--|--|--|--|------|---------|-----------|---|---------|----------------------------|----|---|---------|--------------------------------|----|---|---------|--------------------|----|--|
| | - Major compliance - | <p>Both estates provide training to the workers and staff exposed to pesticides and chemicals. The following training sessions were recorded.</p> <table border="1"> <thead> <tr> <th colspan="4">CEP Niyor Estate</th> </tr> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>05/10/18</td> <td>COBC / Policies Briefings</td> <td>Entire</td> </tr> <tr> <td>2</td> <td>1/3/19</td> <td>MSPO Awareness</td> <td>16</td> </tr> <tr> <td>3</td> <td>25/6/19</td> <td>MSPO RSPO for stakeholders</td> <td>14</td> </tr> <tr> <td>4</td> <td>15/5/19</td> <td>Chemical Handling For Sprayers</td> <td>20</td> </tr> <tr> <td>5</td> <td>27/8/18</td> <td>Spraying operation</td> <td>20</td> </tr> <tr> <td>6</td> <td>16/4/19</td> <td>IPM Management</td> <td>3</td> </tr> <tr> <td>7</td> <td>19/4/19</td> <td>Fertilizer application</td> <td>13</td> </tr> <tr> <td>8</td> <td>20/7/19</td> <td>Trunk injection</td> <td>5</td> </tr> <tr> <td>9</td> <td>5/4/19</td> <td>Town hall 7.0 Session</td> <td>entire</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="4">Lambak Elaeis Estate</th> </tr> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>15/4/19</td> <td>Scheduled waste management</td> <td>13</td> </tr> <tr> <td>2</td> <td>15/4/19</td> <td>Chemical Handling For Sprayers</td> <td>17</td> </tr> <tr> <td>3</td> <td>23/7/19</td> <td>Spraying operation</td> <td>20</td> </tr> </tbody> </table> | CEP Niyor Estate | | | | | Date | Subject | Attendees | 1 | 05/10/18 | COBC / Policies Briefings | Entire | 2 | 1/3/19 | MSPO Awareness | 16 | 3 | 25/6/19 | MSPO RSPO for stakeholders | 14 | 4 | 15/5/19 | Chemical Handling For Sprayers | 20 | 5 | 27/8/18 | Spraying operation | 20 | 6 | 16/4/19 | IPM Management | 3 | 7 | 19/4/19 | Fertilizer application | 13 | 8 | 20/7/19 | Trunk injection | 5 | 9 | 5/4/19 | Town hall 7.0 Session | entire | Lambak Elaeis Estate | | | | | Date | Subject | Attendees | 1 | 15/4/19 | Scheduled waste management | 13 | 2 | 15/4/19 | Chemical Handling For Sprayers | 17 | 3 | 23/7/19 | Spraying operation | 20 | |
| CEP Niyor Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Date | Subject | Attendees | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 05/10/18 | COBC / Policies Briefings | Entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 1/3/19 | MSPO Awareness | 16 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | 25/6/19 | MSPO RSPO for stakeholders | 14 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | 15/5/19 | Chemical Handling For Sprayers | 20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | 27/8/18 | Spraying operation | 20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | 16/4/19 | IPM Management | 3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | 19/4/19 | Fertilizer application | 13 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | 20/7/19 | Trunk injection | 5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | 5/4/19 | Town hall 7.0 Session | entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Lambak Elaeis Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Date | Subject | Attendees | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 15/4/19 | Scheduled waste management | 13 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 15/4/19 | Chemical Handling For Sprayers | 17 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | 23/7/19 | Spraying operation | 20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

MSPO Public Summary Report
Revision 0 (Aug 2017)

| Criterion / Indicator | | Assessment Findings | | | | Compliance | | | | | | | | | | | | |
|--|------------------------|--|---------|-----------------------------|---|------------|--|----------|------------|---|-----------|--|---|----------|--|---|------------------------|--|
| | | 4 | 19/6/19 | Weeding operations | 9 | | | | | | | | | | | | | |
| | | 5 | 13/3/19 | Empty containers management | 4 | | | | | | | | | | | | | |
| | | 6 | 14/3/19 | Trunk injection - census | 5 | | | | | | | | | | | | | |
| <p>Details of other training are available 4.4.6.1 (training and competency). OSH programs are also included. Common programs are initiated from HQ level e.g. OSH meeting, workplace inspection, inspection on PPE, training on MSPO/RSPO etc.</p> <p>The estates provide PPE to the employees relevant to the work handled by the workers. The list of PPE that were provided by the estates are as below:</p> <table border="1"> <thead> <tr> <th></th> <th>Category</th> <th>PPE issued</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Harvester</td> <td>Harvester- Safety Helmet, Sickle Cover, Hand Glove. Wellington Boots</td> </tr> <tr> <td>2</td> <td>Sprayers</td> <td>Sprayers- Respirator, Nitrile Glove (Chemical Resistant) Goggles, Wellington Boots, Apron.</td> </tr> <tr> <td>3</td> <td>Fertilizer application</td> <td>Manuring- Apron, Wellington Boots, Dust Mask</td> </tr> </tbody> </table> <p>Records of PPE issuance for both estates were sighted. During the site visit workers were observed to be in PPE.</p> | | | | | | | | Category | PPE issued | 1 | Harvester | Harvester- Safety Helmet, Sickle Cover, Hand Glove. Wellington Boots | 2 | Sprayers | Sprayers- Respirator, Nitrile Glove (Chemical Resistant) Goggles, Wellington Boots, Apron. | 3 | Fertilizer application | Manuring- Apron, Wellington Boots, Dust Mask |
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| 3 | Fertilizer application | Manuring- Apron, Wellington Boots, Dust Mask | | | | | | | | | | | | | | | | |

MSP0 Public Summary Report
Revision 0 (Aug 2017)

| Criterion / Indicator | Assessment Findings | Compliance | | | | | | |
|-----------------------|--|------------|---------------|-----------|---|---------|---------|--|
| | <p>Both estates has established SOP for chemical handling. This is available in PSQM – Operational Control Procedure under subject Chemical Safety Management. This includes compliance related to;</p> <ul style="list-style-type: none"> - Conduct/reassess CHRA - Review of chemical register - Chemical management assessment review - Conduct health surveillance. <p>The document was sighted and verified.</p> <p>The Estate Managers were appointed as the Chairman of the respective estate ESH committee, letters of appointment dated Lambak Elaeis Estate on 02/1/19 CEP Niyor dated 12/7/19 signed by the RGM. The Senior Assistant for each estate was assigned as the representative for RSPO/ISCC/MSP0 related matters and responsible for all safety and environmental issues. All appointments are valid for a 2 year term.</p> <p>Both estates management conduct regular two-way communication with their employees through the quarterly OSH meetings. The dates of meeting held by both estates are recorded below.</p> <table border="1" data-bbox="1086 1273 1697 1361"> <thead> <tr> <th></th> <th>Lambak Elaeis</th> <th>CEP Niyor</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>03/5/19</td> <td>08/5/19</td> </tr> </tbody> </table> | | Lambak Elaeis | CEP Niyor | 1 | 03/5/19 | 08/5/19 | |
| | Lambak Elaeis | CEP Niyor | | | | | | |
| 1 | 03/5/19 | 08/5/19 | | | | | | |

MSP0 Public Summary Report
Revision 0 (Aug 2017)

| Criterion / Indicator | | Assessment Findings | | | Compliance |
|---|--|---------------------|---------|----------|------------|
| | | 2 | 04/2/19 | 13/2/19 | |
| | | 3 | 2/11/18 | 16/11/18 | |
| | | 4 | 03/8/18 | 27/8/18 | |
| <p>The minutes of meeting for Lambak E & CEP Niyor Estates on 04/2/19 and 08/5/19 respectively were sighted and verified. Workers during the meeting participated in the discussion mainly on line site and safety.</p> <p>Both the estates adhered to the SDPB policy on '<i>Crisis Management & Emergency Response</i>' plan, chapter 13 of PQMS, OSH manual and 'Accident and Reporting and Investigation Procedure' in chapter 14 of the same manual. Each estates and mill had procedures for Fire, Flood, Chemical spillage, strikes and emergency/accident response in both English and <i>Bahasa Malaysia</i>. The procedures were displayed at the office, Muster Ground, Workshop and Dispensary. Names of the members of the Emergency Response Team (ERT) and their contact number were communicated to all employees and displayed at notice boards. Telephone numbers of the nearest police station, Fire Brigade, Immigration Department and Hospital were also included.</p> <p>Both estates trained their nominated employees for First Aid mainly those involved in the field operations. A training program BOFA Basic Occupational First Aider was organised on SOU basis. This was sighted in the training session 19/7/19 and 25/7/19 recorded for both estates</p> | | | | | |

MSP0 Public Summary Report
Revision 0 (Aug 2017)

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | |
|---|---|---|------------|-------|-----|---------|----------|---|-----|---|-----------|---|----|---|--|
| | | <p>in indicator 4.4.6.1 A First Aid Kit equipped with approved 16 items were available and replenished on a weekly basis. Distribution of the 1st Aid Kit for both the estates are made at the following places/personnel;</p> <p>Office / AP Post / Chemical Store / Fertiliser Store / Workshop / Field staff / Mandores. The boxes kept by the mandores were sighted during the field visit. Both estates had regular monthly briefing to the 1st Aid Kit holders on the management of the content and usage. The sessions were briefed by the HA/MA.</p> <p>Records of all accidents are kept in both estates for a min of 10 years. Accident incidences if any are reviewed during safety meetings.</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Cases</th> <th>LTI</th> <th>Non LTI</th> </tr> </thead> <tbody> <tr> <td>Lambak E</td> <td>7</td> <td>156</td> <td>0</td> </tr> <tr> <td>CEP Niyor</td> <td>5</td> <td>13</td> <td>1</td> </tr> </tbody> </table> <p>Lambak Elaies Estate has case involving a sprayer slipped while performing work having LTI of 112 days. The HIRARC was reviewed accordingly. Submission of JKPP7 & 8, 9 to DOSH was compiled under the legislative requirement.</p> | Estate | Cases | LTI | Non LTI | Lambak E | 7 | 156 | 0 | CEP Niyor | 5 | 13 | 1 | |
| Estate | Cases | LTI | Non LTI | | | | | | | | | | | | |
| Lambak E | 7 | 156 | 0 | | | | | | | | | | | | |
| CEP Niyor | 5 | 13 | 1 | | | | | | | | | | | | |
| Criterion 4.4.5: Employment conditions | | | | | | | | | | | | | | | |
| 4.4.5.1 | The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees. | The "Social Policy" drives the company's commitment to providing a workplace that is free from sexual harassment and all other forms of violence against women, workers, and community. The policy also commits to providing sufficient training and development for | Yes | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| | - Major compliance - | employees to increase their awareness and enhance their skills in line with this policy. | |
| 4.4.5.2 | The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance - | SDPB has established a Social Policy, Social & Humanity Management Policy dated January 2015 where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age. Interviewed with the workers found that no discrimination has occurred in the workplace. | Yes |
| 4.4.5.3 | Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance - | Employment contracts for workers were available for verification. Pay and conditions are documented and in line with the Minimum Wage Order 2018. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Among the sampled workers number whom payslips for June and February, 2019 were verified: 117797, 138779, 18154, 107364, 128622, 124629, 135695, 18299, 147182, 109052 at Lambak Elaeis Estate and 65902, 10080, 133712, 134943, 71019, 105556, 126479 at CEP Niyor Estate. | Yes |
| 4.4.5.4 | Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance - | The contractors have signed on the contract agreement prior commencement of work in the estate. In the agreement, it was clearly stated that the contractors shall ensure their workers are paid according to legal requirements. Interview with the contractors confirmed that they understood the terms and conditions stated in the contract. Their workers were paid according to Minimum Wage Order 2018. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|--|------------|
| 4.4.5.5 | <p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p> | <p>The employees that recruited by the mill are from local, Indonesia, Bangladesh and India. They are all under direct employment to the mill. All of them have signed on the employment contract prior to work. Duration of contract/ probation period, position offered, wages, annual leave, allowances and etc. was stated in the employment contract. Sampled of employment contracts were: 117797, 138779, 18154, 107364, 128622, 124629, 135695, 18299, 147182, 109052 at Lambak Elaeis Estate and 65902, 10080, 133712, 134943, 71019, 105556, 126479 at CEP Niyor Estate.</p> | Yes |
| 4.4.5.6 | <p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p> | <p>Employees have been provided with employment contract which were made reference to the collective agreement between employer and employees. The collective agreement for estates were available for verification. The employees that recruited by the estates are from local, Indonesia, Bangladesh and India. They are all under direct employment to the estates. All of them have signed on the employment contract prior to work. Details about period of contract/ probation period, position offered, wages, annual leave, allowances and etc. was stated in the employment contract.</p> | Yes |
| 4.4.5.7 | <p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p>- Major compliance -</p> | <p>Time recording at the estates was implemented through recording of check-roll book. The records were updated on daily basis and attendance of workers was monitored regularly through field supervision from morning muster until the working time is over.</p> | Yes |
| 4.4.5.8 | <p>The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed</p> | <p>Interviewed with the workers confirmed that they have rest time in between of the working hours. Overtimes were paid according to the rate stated in the agreement and regulatory requirements.</p> | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|---|--|------------|
| | and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. - Major compliance - | | |
| 4.4.5.9 | Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance - | Hours of overtime were recorded in the payslip and rate was paid according to the regulatory requirements. | Yes |
| 4.4.5.10 | Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. - Minor compliance - | Among other social benefits offered by the company: <ul style="list-style-type: none"> - workers insurance through NUPW subsidy - phone allowance - accommodation allowance for local workers not staying at company's quarters - retention bonus - tractor/vehicle maintenance allowance | Yes |
| 4.4.5.11 | In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. - Major compliance - | The basic amenities and facilities at the quarters provided by the company to its workers. Electricity and potable water are obtained from the public utilities. The electricity and water bills are borne by the workers themselves. Generally, the workers quarters were in very good condition. In addition, line-site inspection was done by the medical or hospital assistants and reports were documented in accordance to the Workers' Minimum Standards Housing and Amenities Act 1990. The inspection reports were seen by the managers. Nonetheless, the weekly workers | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| | | quarters inspection report can be further improved by reporting more accurately on some criteria such as illegal wiring (OFI). | |
| 4.4.5.12 | The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance - | SDPB has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. Awareness campaign is conducted time to time through various methods such as briefing and meetings. There was no report on sexual harassment or violence case so far. | Yes |
| 4.4.5.13 | The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance - | SDPSB has implemented Social Policy dated January 2015 where the management is committed and respect the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Union Meetings at both visited estates were regularly held and minutes of meeting were maintained. Interview with the workers from different nationalities confirmed that they are allowed to join Union freely without any restriction. | Yes |
| 4.4.5.14 | Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education | The company has developed Child Protection policy dated January 2015. Operating units are complied with the minimum age requirement. Through document reviewed on the Employee Master Listing confirmed that no employee under 18 years was recruited by | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|--|-------------------------------|--|--|--|--|------|---------|-----------|---|----------|---------------------------|--------|---|--------|---------------|----|---|--------|----------------|----|---|---------|----------------------------|----|---|---------|-----------------------------|----|---|---------|------------------------------------|-------------------------------|---|---------|----------------------------|----|---|---------|-------------------------------|--------|---|---------|--------------------------------|----|----|---------|--------------------|----|-----|
| | programmes. Children shall not exposed to hazardous working conditions. - Major compliance - | the company. Interview with the workers and contractors also found that no child labour was practiced by the estates. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Criterion 4.4.6: Training and competency | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.4.6.1 | All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept. - Major compliance - | Both Estates have organized trainings for their employees. There were also sessions held with presence of contractors and neighboring community. The following training records were sighted and verified. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="4">CEP Niyor Estate</th> </tr> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>05/10/18</td> <td>COBC / Policies Briefings</td> <td>Entire</td> </tr> <tr> <td>2</td> <td>1/3/19</td> <td>RSPO Briefing</td> <td>16</td> </tr> <tr> <td>3</td> <td>1/3/19</td> <td>MSPO Awareness</td> <td>16</td> </tr> <tr> <td>4</td> <td>27/8/18</td> <td>Scheduled waste management</td> <td>25</td> </tr> <tr> <td>5</td> <td>25/6/18</td> <td>RSPO /MSPO for stakeholders</td> <td>14</td> </tr> <tr> <td>6</td> <td>26/6/19</td> <td>safety briefing to FFB transporter</td> <td>All FFB transport contractors</td> </tr> <tr> <td>7</td> <td>25/6/19</td> <td>MSPO RSPO for stakeholders</td> <td>14</td> </tr> <tr> <td>8</td> <td>24/7/19</td> <td>Fire Drill with Jabatan BOMBA</td> <td>entire</td> </tr> <tr> <td>9</td> <td>15/5/19</td> <td>Chemical Handling For Sprayers</td> <td>20</td> </tr> <tr> <td>10</td> <td>27/8/18</td> <td>Spraying operation</td> <td>20</td> </tr> </tbody> </table> | CEP Niyor Estate | | | | | Date | Subject | Attendees | 1 | 05/10/18 | COBC / Policies Briefings | Entire | 2 | 1/3/19 | RSPO Briefing | 16 | 3 | 1/3/19 | MSPO Awareness | 16 | 4 | 27/8/18 | Scheduled waste management | 25 | 5 | 25/6/18 | RSPO /MSPO for stakeholders | 14 | 6 | 26/6/19 | safety briefing to FFB transporter | All FFB transport contractors | 7 | 25/6/19 | MSPO RSPO for stakeholders | 14 | 8 | 24/7/19 | Fire Drill with Jabatan BOMBA | entire | 9 | 15/5/19 | Chemical Handling For Sprayers | 20 | 10 | 27/8/18 | Spraying operation | 20 | Yes |
| CEP Niyor Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Date | Subject | Attendees | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 05/10/18 | COBC / Policies Briefings | Entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 1/3/19 | RSPO Briefing | 16 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | 1/3/19 | MSPO Awareness | 16 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | 27/8/18 | Scheduled waste management | 25 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | 25/6/18 | RSPO /MSPO for stakeholders | 14 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | 26/6/19 | safety briefing to FFB transporter | All FFB transport contractors | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | 25/6/19 | MSPO RSPO for stakeholders | 14 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | 24/7/19 | Fire Drill with Jabatan BOMBA | entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | 15/5/19 | Chemical Handling For Sprayers | 20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 | 27/8/18 | Spraying operation | 20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | | | Compliance | | |
|-----------------------|--|----------------------|----------|-----------------------------------|-----------|------------|--|--|
| | | 11 | 31/7/19 | Harvesting – long stalk | 36 | | | |
| | | 12 | 25/1/19 | Competencies welfare HA/MA | 36 | | | |
| | | 13 | 16/4/19 | IPM Management | 3 | | | |
| | | 14 | 19/7/19 | First Aid | 16 | | | |
| | | 15 | 19/4/19 | Harvesters Training LF collection | 16 | | | |
| | | 16 | 19/4/19 | Fertilizer application | 13 | | | |
| | | 17 | 5/10/18 | Safety Briefing To New Workers | 12 | | | |
| | | 18 | 20/7/19 | Trunk injection | 5 | | | |
| | | 19 | 11/10/18 | Clinical waste collection | 15 | | | |
| | | 20 | 16/1/19 | Medical benefit & salary review | 18 | | | |
| | | 21 | 5/4/19 | Town hall 7.0 Session | entire | | | |
| | | 22 | 15/7/19 | FM3 Badang operations | 25 | | | |
| | | 23 | 19/10/18 | WAO Women Aid Organization | 20 | | | |
| | | 24 | 26/7/19 | HCV RTE briefing | Entire | | | |
| | | 25 | 13/3/19 | Drivers pre checking of vehicles | 15 | | | |
| | | Lambak Elaeis Estate | | | | | | |
| | | | Date | Subject | Attendees | | | |
| | | 1 | 24/6/19 | CCP /Policies Briefings | Entire | | | |

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| Criterion / Indicator | | Assessment Findings | | | | Compliance |
|-----------------------|--|--|---------|-----------------------------------|--------|------------|
| | | 2 | 15/4/19 | Scheduled waste management | 13 | |
| | | 3 | 25/7/19 | Fire Drill with Jabatan BOMBA | 17 | |
| | | 4 | 15/4/19 | Chemical Handling For Sprayers | 17 | |
| | | 5 | 23/7/19 | Spraying operation | 20 | |
| | | 6 | 19/6/19 | Weeding operations | 9 | |
| | | 7 | 4/7/19 | Harvesting – long stalk | 12 | |
| | | 8 | 25/7/19 | First Aid | 15 | |
| | | 9 | 12/3/19 | Harvesters Training LF collection | 7 | |
| | | 10 | 22/7/19 | Fertilizer application | 5 | |
| | | 11 | 13/3/19 | Empty containers management | 4 | |
| | | 12 | 22/7/19 | Safety Briefing To New Workers | 4 | |
| | | 13 | 12/3/19 | HIRARC | 26 | |
| | | 14 | 11/4/19 | Town hall 7.0 Session | Entire | |
| | | 15 | 14/3/19 | PQ oil production | 13 | |
| | | 16 | 4/5/19 | LF blower operation | 6 | |
| | | 17 | 22/2/19 | Replanting session | 20 | |
| | | 18 | 14/3/19 | Trunk injection - census | 5 | |
| | | <p>Training for the SOU both estates is an on-going activity and held along with the annual program.</p> | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|--|---|------------|----------|-------|--|--|-----|-----|------|---|--------------------------------|---|--|--|---|---|---|--|--|---|-----------------------------------|---|--|--|---|--|---|--|---|---|--------------------|---|--|---|---|----------------------------|---|---|--|---|---------------------------------------|---|--|---|---|-------------------------|--|---|--|---|-----------------|---|--|---|-----|
| 4.4.6.2 | <p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p> | <p>Similar method for identifying the training needs is used in SOU operating units both estates and the mill. The training needs for both estates for the FY 2019 training program have been established. The details of the training needs include categories of;</p> <ul style="list-style-type: none"> a) job descriptions, b) sections, c) employees group. <p>Included in this program are subjects related to environment e.g. environmental, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training, field activities, equipment handling, vehicles maintenance etc.</p> | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.4.6.3 | <p>A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.</p> <p>- Minor compliance -</p> | <p>The training program for 2019 covering all aspects of the MSP0 indicators and other essential operations activities has been established. Regular assessments of training needs were available and verified. Training needs identification matrix has been established with target dates for of implementation. The training program/subjects among others includes;</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Subjects</th> <th colspan="3">Month</th> </tr> <tr> <th>1-4</th> <th>5-8</th> <th>9-12</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>ESH Legal & Other requirements</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>2</td> <td>Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>3</td> <td>Accident Investigation Techniques</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>4</td> <td>Emergency Respond Plan Training (Chemical spill, poisoning, Fire. Lightning)</td> <td>/</td> <td></td> <td>/</td> </tr> <tr> <td>5</td> <td>First Aid Training</td> <td>/</td> <td></td> <td>/</td> </tr> <tr> <td>6</td> <td>Scheduled waste management</td> <td>/</td> <td>/</td> <td></td> </tr> <tr> <td>7</td> <td>Safe Work Procedure for All Stations.</td> <td>/</td> <td></td> <td>/</td> </tr> <tr> <td>8</td> <td>Confined Space Training</td> <td></td> <td>/</td> <td></td> </tr> <tr> <td>9</td> <td>Policy Training</td> <td>/</td> <td></td> <td>/</td> </tr> </tbody> </table> | | Subjects | Month | | | 1-4 | 5-8 | 9-12 | 1 | ESH Legal & Other requirements | / | | | 2 | Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000 | / | | | 3 | Accident Investigation Techniques | / | | | 4 | Emergency Respond Plan Training (Chemical spill, poisoning, Fire. Lightning) | / | | / | 5 | First Aid Training | / | | / | 6 | Scheduled waste management | / | / | | 7 | Safe Work Procedure for All Stations. | / | | / | 8 | Confined Space Training | | / | | 9 | Policy Training | / | | / | Yes |
| | Subjects | Month | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | 1-4 | 5-8 | 9-12 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | ESH Legal & Other requirements | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000 | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Accident Investigation Techniques | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Emergency Respond Plan Training (Chemical spill, poisoning, Fire. Lightning) | / | | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | First Aid Training | / | | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | Scheduled waste management | / | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | Safe Work Procedure for All Stations. | / | | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | Confined Space Training | | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | Policy Training | / | | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | | | Compliance | | | | | | | | | |
|---|---|---|--|---|---|------------------|--|--|------|---------|-----------|------------|---------------------------|--------|-----|
| | | 10 | Effective workplace inspection | / | / | | | | | | | | | | |
| | | 11 | GAP training / SW | / | / | | | | | | | | | | |
| | | 12 | MSPO & Management Training, | / | / | | | | | | | | | | |
| | | 13 | MSPO Human Right Training, | / | / | | | | | | | | | | |
| | | 14 | Briefing on all SDP Policies (Gender). | / | / | | | | | | | | | | |
| | | 15 | Maintenance of spraying equipment | / | / | | | | | | | | | | |
| | | 16 | HCV Training for Region | / | / | | | | | | | | | | |
| | | 17 | Safe handling of Electrical Equipment | / | / | | | | | | | | | | |
| | | 18 | MSDS/CSDS | / | / | | | | | | | | | | |
| | | 19 | 5 S Housekeeping | / | / | | | | | | | | | | |
| | | 20 | PPE adherence | / | / | | | | | | | | | | |
| | | 21 | Estate Activities / Mill Work stations | / | / | | | | | | | | | | |
| | | 22 | Triple rinsing | / | / | | | | | | | | | | |
| | | 23 | Effective work place inspection | / | / | | | | | | | | | | |
| | | 24 | HIRARC | / | / | | | | | | | | | | |
| | | 25 | Fertilizer application /handling | / | / | | | | | | | | | | |
| 4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services | | | | | | | | | | | | | | | |
| Criterion 4.5.1: Environmental Management Plan | | | | | | | | | | | | | | | |
| 4.5.1.1 | An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance - | <p>There is an environmental management policy issued on Group level signed by the Managing Director in Jan 2015. Communications to the employees were through training session and briefing at muster grounds. Sighted training relating to the environmental subjects as described in indicator 4.4.6.1 above</p> <table border="1"> <tr> <td colspan="3">CEP Niyor Estate</td> </tr> <tr> <td>Date</td> <td>Subject</td> <td>Attendees</td> </tr> <tr> <td>1 05/10/18</td> <td>COBC / Policies Briefings</td> <td>Entire</td> </tr> </table> | | | | CEP Niyor Estate | | | Date | Subject | Attendees | 1 05/10/18 | COBC / Policies Briefings | Entire | Yes |
| CEP Niyor Estate | | | | | | | | | | | | | | | |
| Date | Subject | Attendees | | | | | | | | | | | | | |
| 1 05/10/18 | COBC / Policies Briefings | Entire | | | | | | | | | | | | | |

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| Criterion / Indicator | | Assessment Findings | | | | Compliance | | |
|-----------------------|--|--|----------|--------------------------------|-----------|------------|--|--|
| | | 2 | 1/3/19 | MSP0 Awareness | 16 | | | |
| | | 3 | 27/8/18 | Scheduled waste management | 25 | | | |
| | | 4 | 25/6/19 | MSP0 RSPO for stakeholders | 14 | | | |
| | | 5 | 16/4/19 | IPM Management | 3 | | | |
| | | 6 | 11/10/18 | Clinical waste collection | 15 | | | |
| | | 7 | 5/4/19 | Town hall 7.0 Session | entire | | | |
| | | Lambak Elaeis Estate | | | | | | |
| | | | Date | Subject | Attendees | | | |
| | | 1 | 24/6/19 | Policies Briefings | Entire | | | |
| | | 2 | 15/4/19 | Scheduled waste management | 13 | | | |
| | | 3 | 15/4/19 | Chemical Handling For Sprayers | 17 | | | |
| | | 4 | 23/7/19 | Spraying operation | 20 | | | |
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| | | 6 | 22/7/19 | Fertilizer application | 5 | | | |
| | | 7 | 13/3/19 | Empty containers management | 4 | | | |
| | | 8 | 11/4/19 | Town hall 7.0 Session | Entire | | | |
| | | <p>Subjects on environmental are included the annual training program titled "environmental responsibility & biodiversity-environmental aspect impact assessment".</p> | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | |
|-----------------------|---|--|------------|----------------------|---------------------|---|--|---|---|---|-------------------------------------|---|--------------------|-----------------------------|---|---------------------|---------------------------------|---|----------------------------|-------------------------------------|-----|
| 4.5.1.2 | <p>The environmental management plan shall cover the following:</p> <ul style="list-style-type: none"> a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. <p>- Major compliance -</p> | <p>The EMP policy is available as specified in 4.5.1.1 above. The objectives, target and duration are shown in the Environmental Management program (EMP) incorporating the action plan to be initiated by the estates. The EMP for both estates was sighted. Details of the objectives were also mentioned in 4.5.4.1. The estates identified the aspects and impacts analysis of its operations. Areas are activities at;</p> <ul style="list-style-type: none"> a) main entrance/compound/dispensary/store b) scheduled waste/workshop/weeding/spraying c) FFB transportation/manuring/harvesting and collection. <p>Findings were discussed in ESH meetings.</p> | Yes | | | | | | | | | | | | | | | | | | |
| 4.5.1.3 | <p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p> | <p>The environmental improvement combined with the pollution prevention plans FY 2017/18 were sighted. Both the estates identified the following activities and areas for Improvement plan;</p> <table border="1" data-bbox="1086 962 1906 1233"> <thead> <tr> <th></th> <th>Environmental Issues</th> <th>Mitigating Measures</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Leakage of pesticides during chemical mixing & washing</td> <td>To recollect water used & recycled during next pre-mixing To repair water pump</td> </tr> <tr> <td>2</td> <td>Leakage of lubricant/oil from servicing/parking of vehicles</td> <td>To use oil tray to contain leakages</td> </tr> <tr> <td>3</td> <td>Reduce water usage</td> <td>Practice water conservation</td> </tr> <tr> <td>4</td> <td>Reduce diesel usage</td> <td>PMV planned maintenance vehicle</td> </tr> <tr> <td>5</td> <td>Reduce herbicide pesticide</td> <td>Establishment of nepholepis, LCC/BP</td> </tr> </tbody> </table> <p>BP refers to Beneficial Plant. Monitoring is made through data analysis and the daily field supervision.</p> | | Environmental Issues | Mitigating Measures | 1 | Leakage of pesticides during chemical mixing & washing | To recollect water used & recycled during next pre-mixing To repair water pump | 2 | Leakage of lubricant/oil from servicing/parking of vehicles | To use oil tray to contain leakages | 3 | Reduce water usage | Practice water conservation | 4 | Reduce diesel usage | PMV planned maintenance vehicle | 5 | Reduce herbicide pesticide | Establishment of nepholepis, LCC/BP | Yes |
| | Environmental Issues | Mitigating Measures | | | | | | | | | | | | | | | | | | | |
| 1 | Leakage of pesticides during chemical mixing & washing | To recollect water used & recycled during next pre-mixing To repair water pump | | | | | | | | | | | | | | | | | | | |
| 2 | Leakage of lubricant/oil from servicing/parking of vehicles | To use oil tray to contain leakages | | | | | | | | | | | | | | | | | | | |
| 3 | Reduce water usage | Practice water conservation | | | | | | | | | | | | | | | | | | | |
| 4 | Reduce diesel usage | PMV planned maintenance vehicle | | | | | | | | | | | | | | | | | | | |
| 5 | Reduce herbicide pesticide | Establishment of nepholepis, LCC/BP | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|---|--|------------------|--|--|--|--|------|---------|-----------|---|----------|---------------------------|--------|---|--------|----------------|----|---|---------|----------------------------|----|---|---------|--------------------------------|----|---|---------|--------------------|----|---|---------|----------------|---|---|---------|------------------------|----|---|----------|---------------------------|----|---|--------|-----------------------|--------|-----|
| 4.5.1.4 | A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance - | This is available in the SIA action plan. Details as per indicator 4.1.4.1 and 4.5.1.3 above. Activities/areas identified at working areas, induction program for new workers & housing facilities. | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.5.1.5 | An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance - | <p>A training program is available in the SOU Training Program updated on a yearly basis or revised as per the management requirement. Included in this program are subjects related to environment e.g. environmental, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training. Guidance was provided by the PSQM prior to the approval and implementation by the estates. Trainings conducted in relation to environmental and its improvement plan are shown as follows;</p> <table border="1"> <thead> <tr> <th colspan="4">CEP Niyor Estate</th> </tr> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>05/10/18</td> <td>COBC / Policies Briefings</td> <td>Entire</td> </tr> <tr> <td>2</td> <td>1/3/19</td> <td>MSPO Awareness</td> <td>16</td> </tr> <tr> <td>3</td> <td>27/8/18</td> <td>Scheduled waste management</td> <td>25</td> </tr> <tr> <td>4</td> <td>15/5/19</td> <td>Chemical Handling For Sprayers</td> <td>20</td> </tr> <tr> <td>5</td> <td>27/8/18</td> <td>Spraying operation</td> <td>20</td> </tr> <tr> <td>5</td> <td>16/4/19</td> <td>IPM Management</td> <td>3</td> </tr> <tr> <td>7</td> <td>19/4/19</td> <td>Fertilizer application</td> <td>13</td> </tr> <tr> <td>8</td> <td>11/10/18</td> <td>Clinical waste collection</td> <td>15</td> </tr> <tr> <td>9</td> <td>5/4/19</td> <td>Town hall 7.0 Session</td> <td>entire</td> </tr> </tbody> </table> | CEP Niyor Estate | | | | | Date | Subject | Attendees | 1 | 05/10/18 | COBC / Policies Briefings | Entire | 2 | 1/3/19 | MSPO Awareness | 16 | 3 | 27/8/18 | Scheduled waste management | 25 | 4 | 15/5/19 | Chemical Handling For Sprayers | 20 | 5 | 27/8/18 | Spraying operation | 20 | 5 | 16/4/19 | IPM Management | 3 | 7 | 19/4/19 | Fertilizer application | 13 | 8 | 11/10/18 | Clinical waste collection | 15 | 9 | 5/4/19 | Town hall 7.0 Session | entire | Yes |
| CEP Niyor Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Date | Subject | Attendees | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 05/10/18 | COBC / Policies Briefings | Entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 1/3/19 | MSPO Awareness | 16 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | 27/8/18 | Scheduled waste management | 25 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | 15/5/19 | Chemical Handling For Sprayers | 20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | 27/8/18 | Spraying operation | 20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | 16/4/19 | IPM Management | 3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | 19/4/19 | Fertilizer application | 13 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | 11/10/18 | Clinical waste collection | 15 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | 5/4/19 | Town hall 7.0 Session | entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|---|----------------------|--|--|--|--|------|---------|-----------|---|---------|-------------------------|--------|---|---------|----------------------------|----|---|---------|--------------------------------|----|---|---------|--------------------|----|---|---------|------------------------|---|---|---------|-----------------------------|---|---|---------|-----------------------|--------|--|
| | | <table border="1"> <thead> <tr> <th colspan="4">Lambak Elaeis Estate</th> </tr> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>24/6/19</td> <td>CCP /Policies Briefings</td> <td>Entire</td> </tr> <tr> <td>2</td> <td>15/4/19</td> <td>Scheduled waste management</td> <td>13</td> </tr> <tr> <td>3</td> <td>15/4/19</td> <td>Chemical Handling For Sprayers</td> <td>17</td> </tr> <tr> <td>4</td> <td>23/7/19</td> <td>Spraying operation</td> <td>20</td> </tr> <tr> <td>5</td> <td>22/7/19</td> <td>Fertilizer application</td> <td>5</td> </tr> <tr> <td>6</td> <td>13/3/19</td> <td>Empty containers management</td> <td>4</td> </tr> <tr> <td>7</td> <td>11/4/19</td> <td>Town hall 7.0 Session</td> <td>Entire</td> </tr> </tbody> </table> | Lambak Elaeis Estate | | | | | Date | Subject | Attendees | 1 | 24/6/19 | CCP /Policies Briefings | Entire | 2 | 15/4/19 | Scheduled waste management | 13 | 3 | 15/4/19 | Chemical Handling For Sprayers | 17 | 4 | 23/7/19 | Spraying operation | 20 | 5 | 22/7/19 | Fertilizer application | 5 | 6 | 13/3/19 | Empty containers management | 4 | 7 | 11/4/19 | Town hall 7.0 Session | Entire | |
| Lambak Elaeis Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| 2 | 15/4/19 | Scheduled waste management | 13 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | 15/4/19 | Chemical Handling For Sprayers | 17 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | 23/7/19 | Spraying operation | 20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | 22/7/19 | Fertilizer application | 5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | 13/3/19 | Empty containers management | 4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | 11/4/19 | Town hall 7.0 Session | Entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.5.1.6 | Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance - | Similar forum are used by the mill and the estates in discussing concerns on environmental quality The forum used in the estates are the quarterly ESH meeting and the annual management review meeting. The latter emphasized more on issues on water management plan, electricity use, diesel consumption, waste management, SIA plan, renewable energy, aspect/impact. | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Criterion 4.5.2: Efficiency of energy use and use of renewable energy | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.5.2.1 | Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the | Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement. Sighted tabulation of data maintained by both estates. There were variation in baseline figures between the 2 estates due to operational differences i.e. no of | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|--|--|----------------------|--|--|--|-------|-------------|---------------|------------|---------|------|------|------|--------|------|------|------|---------|------|------|------|--------|------|------|------|--------|------|------|------|--------|------|------|------|--------|------|------|------|--------|------|------|------|--------|------|------|------|----------|------|------|------|--------|------|------|------|---------|------|------|------|------------------|--|--|--|-------|-------------|---------------|------------|---------|------|------|------|--------|------|------|------|---------|------|------|------|--------|------|------|------|--------|------|------|------|--------|------|------|------|--------|------|------|------|--------|------|------|------|--------|------|------|------|----------|------|------|------|--------|------|------|------|--|
| | <p>operations over the base period.</p> <p>- Major compliance -</p> | <p>vehicles, estate topography & infrastructure. Explanatory notes for the variation were provided in the records.</p> <table border="1"> <thead> <tr> <th colspan="4">Lambak Elaies Estate</th> </tr> <tr> <th>Month</th> <th>Diesel used</th> <th>FFB Processed</th> <th>Diesel/FFB</th> </tr> </thead> <tbody> <tr><td>July 18</td><td>7580</td><td>5097</td><td>1.49</td></tr> <tr><td>Aug 18</td><td>8350</td><td>6060</td><td>1.38</td></tr> <tr><td>Sept 18</td><td>7200</td><td>7171</td><td>1.00</td></tr> <tr><td>Oct 18</td><td>7150</td><td>6685</td><td>1.07</td></tr> <tr><td>Nov 18</td><td>6890</td><td>6161</td><td>1.12</td></tr> <tr><td>Dec 18</td><td>7050</td><td>6070</td><td>1.16</td></tr> <tr><td>Jan 19</td><td>7240</td><td>6036</td><td>1.20</td></tr> <tr><td>Feb 19</td><td>6900</td><td>5514</td><td>1.25</td></tr> <tr><td>Mac 19</td><td>6550</td><td>4656</td><td>1.41</td></tr> <tr><td>April 19</td><td>6820</td><td>4937</td><td>1.38</td></tr> <tr><td>May 19</td><td>7100</td><td>4548</td><td>1.56</td></tr> <tr><td>June 19</td><td>6050</td><td>4589</td><td>1.51</td></tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="4">CEP Niyor Estate</th> </tr> <tr> <th>Month</th> <th>Diesel used</th> <th>FFB Processed</th> <th>Diesel/FFB</th> </tr> </thead> <tbody> <tr><td>July 18</td><td>4585</td><td>1943</td><td>2.36</td></tr> <tr><td>Aug 18</td><td>5432</td><td>2654</td><td>2.05</td></tr> <tr><td>Sept 18</td><td>6064</td><td>3535</td><td>1.72</td></tr> <tr><td>Oct 18</td><td>7056</td><td>3668</td><td>1.92</td></tr> <tr><td>Nov 18</td><td>6669</td><td>3408</td><td>1.96</td></tr> <tr><td>Dec 18</td><td>6317</td><td>3439</td><td>1.84</td></tr> <tr><td>Jan 19</td><td>6408</td><td>3518</td><td>1.82</td></tr> <tr><td>Feb 19</td><td>5653</td><td>2821</td><td>2.00</td></tr> <tr><td>Mac 19</td><td>4728</td><td>3119</td><td>1.52</td></tr> <tr><td>April 19</td><td>5997</td><td>2832</td><td>2.12</td></tr> <tr><td>May 19</td><td>5655</td><td>2369</td><td>2.39</td></tr> </tbody> </table> | Lambak Elaies Estate | | | | Month | Diesel used | FFB Processed | Diesel/FFB | July 18 | 7580 | 5097 | 1.49 | Aug 18 | 8350 | 6060 | 1.38 | Sept 18 | 7200 | 7171 | 1.00 | Oct 18 | 7150 | 6685 | 1.07 | Nov 18 | 6890 | 6161 | 1.12 | Dec 18 | 7050 | 6070 | 1.16 | Jan 19 | 7240 | 6036 | 1.20 | Feb 19 | 6900 | 5514 | 1.25 | Mac 19 | 6550 | 4656 | 1.41 | April 19 | 6820 | 4937 | 1.38 | May 19 | 7100 | 4548 | 1.56 | June 19 | 6050 | 4589 | 1.51 | CEP Niyor Estate | | | | Month | Diesel used | FFB Processed | Diesel/FFB | July 18 | 4585 | 1943 | 2.36 | Aug 18 | 5432 | 2654 | 2.05 | Sept 18 | 6064 | 3535 | 1.72 | Oct 18 | 7056 | 3668 | 1.92 | Nov 18 | 6669 | 3408 | 1.96 | Dec 18 | 6317 | 3439 | 1.84 | Jan 19 | 6408 | 3518 | 1.82 | Feb 19 | 5653 | 2821 | 2.00 | Mac 19 | 4728 | 3119 | 1.52 | April 19 | 5997 | 2832 | 2.12 | May 19 | 5655 | 2369 | 2.39 | |
| Lambak Elaies Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Month | Diesel used | FFB Processed | Diesel/FFB | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| July 18 | 7580 | 5097 | 1.49 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug 18 | 8350 | 6060 | 1.38 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sept 18 | 7200 | 7171 | 1.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct 18 | 7150 | 6685 | 1.07 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nov 18 | 6890 | 6161 | 1.12 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dec 18 | 7050 | 6070 | 1.16 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan 19 | 7240 | 6036 | 1.20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb 19 | 6900 | 5514 | 1.25 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mac 19 | 6550 | 4656 | 1.41 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| April 19 | 6820 | 4937 | 1.38 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May 19 | 7100 | 4548 | 1.56 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| June 19 | 6050 | 4589 | 1.51 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CEP Niyor Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Month | Diesel used | FFB Processed | Diesel/FFB | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| July 18 | 4585 | 1943 | 2.36 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug 18 | 5432 | 2654 | 2.05 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sept 18 | 6064 | 3535 | 1.72 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct 18 | 7056 | 3668 | 1.92 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nov 18 | 6669 | 3408 | 1.96 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dec 18 | 6317 | 3439 | 1.84 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan 19 | 6408 | 3518 | 1.82 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb 19 | 5653 | 2821 | 2.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mac 19 | 4728 | 3119 | 1.52 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| April 19 | 5997 | 2832 | 2.12 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May 19 | 5655 | 2369 | 2.39 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | | | Compliance | | | | | | | | | | | | | | | | |
|--|--|---|------|------|------|---------------|----------|------------------------|--------------------------------------|----------------------------------|------------------|-------------|----------|-----------------------|--------|----------------------------|----------|---------------------------------|----------|--|-----------------------|-----|
| | | June 19 | 3907 | 2072 | 1.89 | | | | | | | | | | | | | | | | | |
| 4.5.2.2 | <p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p>- Major compliance -</p> | <p>The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets. Refer details as per indicator 4.5.2.1 above.</p> | | | | Yes | | | | | | | | | | | | | | | | |
| 4.5.2.3 | <p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p> | <p>There was no opportunity to use renewable energy in both Estates.</p> | | | | Yes | | | | | | | | | | | | | | | | |
| Criterion 4.5.3: Waste management and disposal | | | | | | | | | | | | | | | | | | | | | | |
| 4.5.3.1 | <p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p> | <p>All waste and pollution are identified and documented in the Waste Management Action Plan. The compilation for Financial Year 2019 was made at SOU level. Details of waste generated from the estates and mill operations among others are shown below;</p> <table border="1" data-bbox="1084 1066 1899 1366"> <thead> <tr> <th data-bbox="1084 1066 1503 1101">Type of waste</th> <th data-bbox="1503 1066 1899 1101">Location</th> </tr> </thead> <tbody> <tr> <td data-bbox="1084 1101 1503 1129">Domestic waste rubbish</td> <td data-bbox="1503 1101 1899 1129">Line sites, office, workshop, store,</td> </tr> <tr> <td data-bbox="1084 1129 1503 1158">Industrial waste-fertilizer bags</td> <td data-bbox="1503 1129 1899 1158">Empty bags store</td> </tr> <tr> <td data-bbox="1084 1158 1503 1187">Scrap metal</td> <td data-bbox="1503 1158 1899 1187">workshop</td> </tr> <tr> <td data-bbox="1084 1187 1503 1216">SW 404 Clinical waste</td> <td data-bbox="1503 1187 1899 1216">clinic</td> </tr> <tr> <td data-bbox="1084 1216 1503 1244">SW rags, plastics, filters</td> <td data-bbox="1503 1216 1899 1244">Workshop</td> </tr> <tr> <td data-bbox="1084 1244 1503 1273">Spent lubricant & hydraulic oil</td> <td data-bbox="1503 1244 1899 1273">Workshop</td> </tr> <tr> <td data-bbox="1084 1273 1503 1366">Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW</td> <td data-bbox="1503 1273 1899 1366">Scheduled waste store</td> </tr> </tbody> </table> | | | | Type of waste | Location | Domestic waste rubbish | Line sites, office, workshop, store, | Industrial waste-fertilizer bags | Empty bags store | Scrap metal | workshop | SW 404 Clinical waste | clinic | SW rags, plastics, filters | Workshop | Spent lubricant & hydraulic oil | Workshop | Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW | Scheduled waste store | Yes |
| Type of waste | Location | | | | | | | | | | | | | | | | | | | | | |
| Domestic waste rubbish | Line sites, office, workshop, store, | | | | | | | | | | | | | | | | | | | | | |
| Industrial waste-fertilizer bags | Empty bags store | | | | | | | | | | | | | | | | | | | | | |
| Scrap metal | workshop | | | | | | | | | | | | | | | | | | | | | |
| SW 404 Clinical waste | clinic | | | | | | | | | | | | | | | | | | | | | |
| SW rags, plastics, filters | Workshop | | | | | | | | | | | | | | | | | | | | | |
| Spent lubricant & hydraulic oil | Workshop | | | | | | | | | | | | | | | | | | | | | |
| Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW | Scheduled waste store | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|--|---------------|----------|--------------------|------------------------|--------------------------------------|--|----------------------------------|------------------|--|-------------|----------|---|-----------------------|--------|--|----------------------------|----------|---|---------------------------------|----------|--|--|-----------------------|---|-----|
| 4.5.3.2 | <p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>a) Identifying and monitoring sources of waste and pollution</p> <p>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</p> <p>- Major compliance -</p> | <p>The disposal/recycling of waste generated by the estates are made as follows;</p> <table border="1"> <thead> <tr> <th>Type of waste</th> <th>Location</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td>Domestic waste rubbish</td> <td>Line sites, office, workshop, store,</td> <td>Collection/disposal 2 to 3x /week in designated landfill area.</td> </tr> <tr> <td>Industrial waste-fertilizer bags</td> <td>Empty bags store</td> <td>Inventory of bags, reuse for LF collection, sell to appointed contractor for surplus quantity.</td> </tr> <tr> <td>Scrap metal</td> <td>workshop</td> <td>Inventory maintained, tender at zone level for sale to licensed contractors</td> </tr> <tr> <td>SW 404 Clinical waste</td> <td>clinic</td> <td>Inventory maintained. Storage in sharp bin in clinic. Disposal to <i>Kualiti Alam Sdn Bhd.</i></td> </tr> <tr> <td>SW rags, plastics, filters</td> <td>Workshop</td> <td>Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor.</td> </tr> <tr> <td>Spent lubricant & hydraulic oil</td> <td>Workshop</td> <td>Collection by Saudara Baru Sdn Bhd upon completion of maintenance.</td> </tr> <tr> <td>Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW</td> <td>Scheduled waste store</td> <td>Inventory maintained. Storage in SW store. All containers are labelled. Empty containers collected by authorized vendor..</td> </tr> </tbody> </table> <p>This is at current a viable option as practiced elsewhere in the industry.</p> | Type of waste | Location | Action to be taken | Domestic waste rubbish | Line sites, office, workshop, store, | Collection/disposal 2 to 3x /week in designated landfill area. | Industrial waste-fertilizer bags | Empty bags store | Inventory of bags, reuse for LF collection, sell to appointed contractor for surplus quantity. | Scrap metal | workshop | Inventory maintained, tender at zone level for sale to licensed contractors | SW 404 Clinical waste | clinic | Inventory maintained. Storage in sharp bin in clinic. Disposal to <i>Kualiti Alam Sdn Bhd.</i> | SW rags, plastics, filters | Workshop | Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor. | Spent lubricant & hydraulic oil | Workshop | Collection by Saudara Baru Sdn Bhd upon completion of maintenance. | Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW | Scheduled waste store | Inventory maintained. Storage in SW store. All containers are labelled. Empty containers collected by authorized vendor.. | Yes |
| Type of waste | Location | Action to be taken | | | | | | | | | | | | | | | | | | | | | | | | | |
| Domestic waste rubbish | Line sites, office, workshop, store, | Collection/disposal 2 to 3x /week in designated landfill area. | | | | | | | | | | | | | | | | | | | | | | | | | |
| Industrial waste-fertilizer bags | Empty bags store | Inventory of bags, reuse for LF collection, sell to appointed contractor for surplus quantity. | | | | | | | | | | | | | | | | | | | | | | | | | |
| Scrap metal | workshop | Inventory maintained, tender at zone level for sale to licensed contractors | | | | | | | | | | | | | | | | | | | | | | | | | |
| SW 404 Clinical waste | clinic | Inventory maintained. Storage in sharp bin in clinic. Disposal to <i>Kualiti Alam Sdn Bhd.</i> | | | | | | | | | | | | | | | | | | | | | | | | | |
| SW rags, plastics, filters | Workshop | Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor. | | | | | | | | | | | | | | | | | | | | | | | | | |
| Spent lubricant & hydraulic oil | Workshop | Collection by Saudara Baru Sdn Bhd upon completion of maintenance. | | | | | | | | | | | | | | | | | | | | | | | | | |
| Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW | Scheduled waste store | Inventory maintained. Storage in SW store. All containers are labelled. Empty containers collected by authorized vendor.. | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.5.3.3 | <p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under</p> | <p>The procedures for handling used chemicals classified under Environment Quality Regulation (Scheduled Waste) 2005,</p> | Yes | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|--|--|------------|--------|------|--------------------------------|-------|--|--|--|-----|-----|-----|-----|-----|---|-----------------|---------|-------|--|---|---|--|---|------------------|---------|-------|-------|---|---|--|---|-----------------|---------|---|---|---|---|-------|---|------------------|---------|---|---|---|---|-------|--|
| | <p>Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p>- Major compliance -</p> | <p>Environmental Quality Act, 1974 are available prepared on Group level by SQM and implemented in all estates and mills for all the applicable practices. The operational control procedures for the scheduled wastes management provides guidelines as follows;</p> <ul style="list-style-type: none"> a) Management of class 1 chemical containers b) Management of class 2 (and higher) chemical containers c) Management of fertilizer bags <p>This document was established on 28/2/2015 and remains effective for practice in all estates and mills. The scheduled waste management, a procedure "<i>Handling of Scheduled Waste</i>" was established. The wastes were disposed through DOE's licensed contractor <i>M/s Perniagaan Saudara Baru Sdn Bhd</i> licence no 004757 validity 30/4/20. Records as shown below. SW 404 clinical waste are despatched to <i>Kualiti Alam Sdn Bhd</i>.</p> <table border="1" data-bbox="1088 938 1883 1198"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Estate</th> <th rowspan="2">Date</th> <th colspan="5">Type/Code of SW Despatched /mt</th> </tr> <tr> <th>305</th> <th>410</th> <th>102</th> <th>409</th> <th>404</th> </tr> </thead> <tbody> <tr> <td>1</td> <td><i>Lambak E</i></td> <td>04/7/19</td> <td>0.100</td> <td></td> <td>-</td> <td>-</td> <td></td> </tr> <tr> <td>2</td> <td><i>CEP Niyor</i></td> <td>24/4/19</td> <td>0.300</td> <td>0.020</td> <td>-</td> <td>-</td> <td></td> </tr> <tr> <td>3</td> <td><i>Lambak E</i></td> <td>30/4/19</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>0.001</td> </tr> <tr> <td>4</td> <td><i>CEP Niyor</i></td> <td>30/4/19</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>0.022</td> </tr> </tbody> </table> | | Estate | Date | Type/Code of SW Despatched /mt | | | | | 305 | 410 | 102 | 409 | 404 | 1 | <i>Lambak E</i> | 04/7/19 | 0.100 | | - | - | | 2 | <i>CEP Niyor</i> | 24/4/19 | 0.300 | 0.020 | - | - | | 3 | <i>Lambak E</i> | 30/4/19 | - | - | - | - | 0.001 | 4 | <i>CEP Niyor</i> | 30/4/19 | - | - | - | - | 0.022 | |
| | Estate | Date | | | | Type/Code of SW Despatched /mt | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | 305 | 410 | 102 | 409 | 404 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | <i>Lambak E</i> | 04/7/19 | 0.100 | | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | <i>CEP Niyor</i> | 24/4/19 | 0.300 | 0.020 | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | <i>Lambak E</i> | 30/4/19 | - | - | - | - | 0.001 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | <i>CEP Niyor</i> | 30/4/19 | - | - | - | - | 0.022 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>4.5.3.4</p> | <p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's</p> | <p>Under the operational control procedure established as given in 4.5.3.3 above the guideline and practice for handling empty pesticides containers are as follows;</p> <ul style="list-style-type: none"> a) All class 2 and above containers are tripled rinsed and holes | <p>Yes</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | |
|---|---|---|-------------------------|----------|--------|------|----------|---|---------|---------------|-------------------------|--------|--------------------|------|--------------------|--------|---|---------|-----------|-----------------------|--------|-----------------------|----------|--|
| | <p>labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p>- Major compliance -</p> | <p>punctured at the bottom only if the waste generator is to dispose as non-scheduled waste.</p> <p>b) Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process.</p> <p>These guidelines are based on Department Of Agriculture ref 91/120/038/014 dated 7/11/2002. During the site visit this has been adhered mainly containers are tripled rinsed and holes punctured at the container base. Dispatches are made to <i>M/s SS Setia Teknologi Enterprise</i>. Records of disposal as follows;</p> <table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>Estate</th> <th>Type</th> <th>Quantity</th> </tr> </thead> <tbody> <tr> <td rowspan="3">1</td> <td rowspan="3">27/6/19</td> <td rowspan="3">Lambak Elaies</td> <td>Empty containers – 20 L</td> <td>56 pcs</td> </tr> <tr> <td>Ally bottles 500 g</td> <td>6 kg</td> </tr> <tr> <td>Empty container 2T</td> <td>36 pcs</td> </tr> <tr> <td rowspan="2">2</td> <td rowspan="2">18/6/19</td> <td rowspan="2">CEP Niyor</td> <td>Empty containers 20 L</td> <td>59 pcs</td> </tr> <tr> <td>Empty fertilizer bags</td> <td>1.590 mt</td> </tr> </tbody> </table> | | Date | Estate | Type | Quantity | 1 | 27/6/19 | Lambak Elaies | Empty containers – 20 L | 56 pcs | Ally bottles 500 g | 6 kg | Empty container 2T | 36 pcs | 2 | 18/6/19 | CEP Niyor | Empty containers 20 L | 59 pcs | Empty fertilizer bags | 1.590 mt | |
| | Date | Estate | Type | Quantity | | | | | | | | | | | | | | | | | | | | |
| 1 | 27/6/19 | Lambak Elaies | Empty containers – 20 L | 56 pcs | | | | | | | | | | | | | | | | | | | | |
| | | | Ally bottles 500 g | 6 kg | | | | | | | | | | | | | | | | | | | | |
| | | | Empty container 2T | 36 pcs | | | | | | | | | | | | | | | | | | | | |
| 2 | 18/6/19 | CEP Niyor | Empty containers 20 L | 59 pcs | | | | | | | | | | | | | | | | | | | | |
| | | | Empty fertilizer bags | 1.590 mt | | | | | | | | | | | | | | | | | | | | |
| 4.5.3.5 | <p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p>- Minor compliance -</p> | <p>Both the estates used the facility of landfill areas located in respective estate;</p> <p>a) Lambak E located in P2017A b) CEP Niyor situated in P2011A</p> <p>The signboards were available with date close and open. Site was visited and verified.</p> | Yes | | | | | | | | | | | | | | | | | | | | | |
| Criterion 4.5.4: Reduction of pollution and emission | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | |
|-----------------------|--|---|------------|--|--------------------|---|--|--|---|--|------------------------|--|---|--|-----|--|-----|
| 4.5.4.1 | An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance - | Both estates assessed their polluting activities. It is tabulated under the environmental management program. Therein is given potential sources of pollutants, objective & targets and action to be taken. Sighted targeted areas assessed among others combined as follows; <table border="1" data-bbox="1086 608 1904 991"> <tr> <td></td> <td>Sources of polluting activities/objective & target</td> </tr> <tr> <td>1</td> <td>Management of HCV 4.0 water catchment used for nursery irrigation</td> </tr> <tr> <td>2</td> <td>To monitor waste management plan for its suitability</td> </tr> <tr> <td>3</td> <td>To improve employees awareness on pollution prevention at housing complex including zero burning policy.</td> </tr> <tr> <td>4</td> <td>To minimise spillage of oil/chemical onto the ground</td> </tr> <tr> <td>5</td> <td>To review aspect identification & impact evaluation to identify significant critical points for control.</td> </tr> <tr> <td>6</td> <td>Maintenance of fruit trees in the estates.</td> </tr> </table> | | Sources of polluting activities/objective & target | 1 | Management of HCV 4.0 water catchment used for nursery irrigation | 2 | To monitor waste management plan for its suitability | 3 | To improve employees awareness on pollution prevention at housing complex including zero burning policy. | 4 | To minimise spillage of oil/chemical onto the ground | 5 | To review aspect identification & impact evaluation to identify significant critical points for control. | 6 | Maintenance of fruit trees in the estates. | Yes |
| | Sources of polluting activities/objective & target | | | | | | | | | | | | | | | | |
| 1 | Management of HCV 4.0 water catchment used for nursery irrigation | | | | | | | | | | | | | | | | |
| 2 | To monitor waste management plan for its suitability | | | | | | | | | | | | | | | | |
| 3 | To improve employees awareness on pollution prevention at housing complex including zero burning policy. | | | | | | | | | | | | | | | | |
| 4 | To minimise spillage of oil/chemical onto the ground | | | | | | | | | | | | | | | | |
| 5 | To review aspect identification & impact evaluation to identify significant critical points for control. | | | | | | | | | | | | | | | | |
| 6 | Maintenance of fruit trees in the estates. | | | | | | | | | | | | | | | | |
| 4.5.4.2 | An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance - | Details of action plan for identified pollutants are shown below; <table border="1" data-bbox="1086 1059 1904 1388"> <thead> <tr> <th></th> <th>Sources/objective & target</th> <th>Action Plan /Steps</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Management of HCV water catchment for nursery irrigation</td> <td>To train/retrain sprayers /manuring gang to avoid any chemical-related works at the area</td> </tr> <tr> <td>2</td> <td>To monitor waste management plan for its suitability</td> <td>SW disposal monitoring</td> </tr> <tr> <td>3</td> <td>To improve employees awareness on pollution</td> <td>Continuous reminders</td> </tr> </tbody> </table> | | Sources/objective & target | Action Plan /Steps | 1 | Management of HCV water catchment for nursery irrigation | To train/retrain sprayers /manuring gang to avoid any chemical-related works at the area | 2 | To monitor waste management plan for its suitability | SW disposal monitoring | 3 | To improve employees awareness on pollution | Continuous reminders | Yes | | |
| | Sources/objective & target | Action Plan /Steps | | | | | | | | | | | | | | | |
| 1 | Management of HCV water catchment for nursery irrigation | To train/retrain sprayers /manuring gang to avoid any chemical-related works at the area | | | | | | | | | | | | | | | |
| 2 | To monitor waste management plan for its suitability | SW disposal monitoring | | | | | | | | | | | | | | | |
| 3 | To improve employees awareness on pollution | Continuous reminders | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | Compliance | | | | | | | | |
|---|--|---|--|--|--|---|---|---|--|---|---|-----|
| | | | prevention at housing complex including zero burning policy. | | | | | | | | | |
| | | 4 | To minimise spillage of oil/chemical onto the ground | Continuous training and use of spill trays | | | | | | | | |
| | | 5 | To review aspect identification & impact evaluation to identify significant critical points for control. | Review through EA/EIE | | | | | | | | |
| | | 6 | Maintenance of forest trees in the estates. | Ensure signage & demarcation is visible to avoid chemical intervention. To monitor pollution/erosion | | | | | | | | |
| Criterion 4.5.5: Natural water resources | | | | | | | | | | | | |
| 4.5.5.1 | <p>The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <p>a. Assessment of water usage and sources of supply.</p> <p>b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities.</p> <p>c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application,</p> | <p>The Water Management Plan for the estates has been established. This is compiled on Group basis and amended to meet demands of specific issue in operating units. It is reviewed on annual basis for the Financial Year 2019 plan. Included therein are inspection of reservoir, water treatment, monitoring of processed water, water leakages/overflow, run-off and ETP monitoring. The estate management has provided contingency plans 2019. Steps/options to be adopted taken are;</p> <table border="1"> <tr> <td></td> <td>contingency plans in event of water crisis</td> </tr> <tr> <td>1</td> <td>to purchase water from Syarikat Air Johor</td> </tr> <tr> <td>2</td> <td>to train/educate staff/workers to conserve water</td> </tr> <tr> <td>3</td> <td>to revise demand and supply volume / conditions</td> </tr> </table> | | | contingency plans in event of water crisis | 1 | to purchase water from Syarikat Air Johor | 2 | to train/educate staff/workers to conserve water | 3 | to revise demand and supply volume / conditions | Yes |
| | contingency plans in event of water crisis | | | | | | | | | | | |
| 1 | to purchase water from Syarikat Air Johor | | | | | | | | | | | |
| 2 | to train/educate staff/workers to conserve water | | | | | | | | | | | |
| 3 | to revise demand and supply volume / conditions | | | | | | | | | | | |

| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|----------------------|-------------------------|--|---|---|---|---|--|---|--------------------------------|--|----------------------|----------------------|---|-----|----|---|-------|----|---|-------|----|---|------|----|---|----|---|--|
| <p>maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p> | <table border="1" data-bbox="1093 451 1720 635"> <tr> <td>4</td> <td>to monitor water supply</td> </tr> <tr> <td></td> <td>contingency plans in event of water pollution</td> </tr> <tr> <td>1</td> <td>to purchase water from Syarikat Air Johor</td> </tr> <tr> <td>2</td> <td>to perform treatment of polluted water</td> </tr> <tr> <td>3</td> <td>to reusing/recycling/rationing</td> </tr> </table> <p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014). The buffer zones established are as following:</p> <table border="1" data-bbox="1137 890 1720 1169"> <thead> <tr> <th></th> <th>River width (Meters)</th> <th>Buffer Zone (Meters)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>>40</td> <td>50</td> </tr> <tr> <td>2</td> <td>20-40</td> <td>40</td> </tr> <tr> <td>3</td> <td>10-20</td> <td>20</td> </tr> <tr> <td>4</td> <td>5-10</td> <td>10</td> </tr> <tr> <td>5</td> <td><5</td> <td>5</td> </tr> </tbody> </table> <p>There is no surrounding water courses/river at both the estates hence no monitoring required for any effect of estates activities. There is no bore well available in both the estates.</p> | 4 | to monitor water supply | | contingency plans in event of water pollution | 1 | to purchase water from Syarikat Air Johor | 2 | to perform treatment of polluted water | 3 | to reusing/recycling/rationing | | River width (Meters) | Buffer Zone (Meters) | 1 | >40 | 50 | 2 | 20-40 | 40 | 3 | 10-20 | 20 | 4 | 5-10 | 10 | 5 | <5 | 5 | |
| 4 | to monitor water supply | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | contingency plans in event of water pollution | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | to purchase water from Syarikat Air Johor | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | to perform treatment of polluted water | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | to reusing/recycling/rationing | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | River width (Meters) | Buffer Zone (Meters) | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | >40 | 50 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 20-40 | 40 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | 10-20 | 20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | 5-10 | 10 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | <5 | 5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | |
|---|--|--|----------------------|--------|---------|-------------|---|---------------|--------|------|---|---------------|---------|--------------|---|---------------|---------|----------------------|-----|
| 4.5.5.2 | No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance - | This is in compliance by the estates. This requirement is also audited internally by the RQSM personnel. During the field visit no construction of such was observed. | Yes | | | | | | | | | | | | | | | | |
| 4.5.5.3 | Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). - Minor compliance - | During the site visit practices of water harvesting are noted mainly constructed on flat areas in both estates. There were construction of MCP = Moisture Conservation Pit at interval of every 40 ft & every 2 palms. Road side pits were also available at every 3 palm rows, to divert in event of water overflowing and also to benefit the nearest palm at the pit end to obtain additional moisture. This is part of the common practices introduced within the SDP Group Agriculture Procedures. | Yes | | | | | | | | | | | | | | | | |
| Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value | | | | | | | | | | | | | | | | | | | |
| 4.5.6.1 | Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover: a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), | The high biodiversity is included in the HCV assessment report dated August 2016. Birds, mammals, reptiles, insect (least concern and vulnerable) and totally protected and protected wildlife were identified based on the latest HCV report. For example vulnerable animal; bearded pig (mammals) under category totally protected. The established management plan has been incorporated the action plan for those identified animals (IUCN and WCA 2010) for proper monitoring. <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>HCV 4.0</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Lambak Elaeis</td> <td>0.3 ha</td> <td>Pond</td> </tr> <tr> <td>2</td> <td>Lambak Elaeis</td> <td>1.97 ha</td> <td>Natural pond</td> </tr> <tr> <td>3</td> <td>Lambak Elaeis</td> <td>0.38 ha</td> <td>Water catchment area</td> </tr> </tbody> </table> | | Estate | HCV 4.0 | Description | 1 | Lambak Elaeis | 0.3 ha | Pond | 2 | Lambak Elaeis | 1.97 ha | Natural pond | 3 | Lambak Elaeis | 0.38 ha | Water catchment area | Yes |
| | Estate | HCV 4.0 | Description | | | | | | | | | | | | | | | | |
| 1 | Lambak Elaeis | 0.3 ha | Pond | | | | | | | | | | | | | | | | |
| 2 | Lambak Elaeis | 1.97 ha | Natural pond | | | | | | | | | | | | | | | | |
| 3 | Lambak Elaeis | 0.38 ha | Water catchment area | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | | | Compliance | |
|-----------------------|---|--|-----------|---------|----------------------|--|
| | <p>that could be significantly affected by the grower(s) activities.</p> <p>- Major compliance -</p> | 4 | CEP Niyor | 6.11 ha | Water catchment area | |
| 4.5.6.2 | <p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>d) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>e) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p>- Major compliance -</p> | <p>There is not RTE recorded. Evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities were maintained and implemented. Signage as well as routine patrolling activities were utilized as part of creating awareness among employees and maintain HCVs.</p> <p>The estates had established a HCV action plan for FY2019 such as briefing/training to workers on protection of water catchment that encroachment and hunting are not allowed.</p> | | | Yes | |
| 4.5.6.3 | <p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p> | <p>All operating units have developed Management Plan for the HCV and conservation area to protect from any encroachment. Habitat protection includes prevention of disturbance by workers through awareness campaigns and regular patrols of the area. The estates have installed signboards at prominent areas to prohibit hunting, disturbance of protected areas and the lighting of fires. Inspection of housing areas and interview of residents confirmed workers were aware of the company policy that prohibits hunting and collecting activities. Monitoring is carried out by the security and staff in charge for the respective area. <i>Sime Darby Plantation</i> in addition established their own disciplinary measures if found any staff or workers found to capture, harm, collect or kill the RTE species in the estate. On-going monitoring for HCV areas for both Estates has been verified. The</p> | | | Yes | |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|--|------------|
| | | monitoring was conducted on monthly basis. None of the existing cemeteries and worship areas have conservation /sacred cultural values to the local communities. | |
| Criterion 4.5.7: Zero burning practices | | | |
| 4.5.7.1 | Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance - | The Group policy of "Zero open burning" is enforced since July 2008. The operating units adhered to the policy of "Zero open burning" for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. Both estates had replanting program spanned over the forthcoming years. Refer details in 4.6.2.2. In addition <i>Sime Darby Plantation</i> assigned 1 person based in HQ being in charge to detect any open fire in the Company's fields using the Global Spot Watch. | Yes |
| 4.5.7.2 | A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. - Major compliance - | N/A. Details in 4.5.7.1 above | NA |
| 4.5.7.3 | Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance - | N/A. Details in 4.5.7.1 above | NA |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|--|------------|
| 4.5.7.4 | <p>Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.</p> <p>- Minor compliance -</p> | <p>This is included in the specification of work orders in event of land preparation during a replanting. It is a standard practice in Sime Darby Plantation. However there are variations of practices between inland and coastal estates. Trunks are felled and chipped without having to shred and windrowed in certain conditions. Adjustment of work requirement are finalised from the directive of the replanting unit and the Regional Office.</p> | Yes |
| 4.6 Principle 6: Best Practices | | | |
| Criterion 4.6.1: Site Management | | | |
| 4.6.1.1 | <p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p> | <p>The standard operation procedure for the estates / mill operations is available which is prepared on Group basis. There are levels of the documentation identified as follows;</p> <ul style="list-style-type: none"> a) Level 1 Estate quality management system standard operation manual b) Level 2 EQMS quality management manual c) Level 3 standard operating procedure d) Level 4 work instruction e) Level 5 records. <p>Amendments are made should there be requirement to suit the local issues/situation.</p> | Yes |
| 4.6.1.2 | <p>Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent</p> | <p>The estates construct terraces at slope area of more than 6 degree. Planting of cover crop are made to retain the soil structure and conservation. Road side pit are made to divert water at slope areas to prevent road erosion and surface damage. Terraces are constructed inclined towards the terrace wall. Slope of more than 25 degrees are</p> | Yes |

| Criterion / Indicator | | Assessment Findings | | | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|--|--|-----------|--|------------|----------|----------|-----------|--|--|-----------|--|---|-------|-------|-------|---|------|-------|-------|---|-------|-------|------|---|---------|------|------|---|--------|------|------|---|-----|------|------|--|--------------|--------|----------|--|
| | contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. - Major compliance - | avoided in the planting areas due to the Policy of the Company forecasting several issues during the crop recovery on maturity. This is also to comply along with the RSPO guidelines The topography information as shown below: <table border="1" data-bbox="1086 587 1644 1010"> <thead> <tr> <th></th> <th>Category</th> <th>Lambak E</th> <th>CEP Niyor</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td colspan="2">Area in %</td> </tr> <tr> <td>1</td> <td>0 - 2</td> <td>14.92</td> <td>31.61</td> </tr> <tr> <td>2</td> <td>2 -6</td> <td>50.99</td> <td>62.82</td> </tr> <tr> <td>3</td> <td>6 -12</td> <td>25.49</td> <td>5.47</td> </tr> <tr> <td>4</td> <td>12 - 20</td> <td>5.80</td> <td>0.09</td> </tr> <tr> <td>5</td> <td>20 -25</td> <td>1.46</td> <td>0.00</td> </tr> <tr> <td>6</td> <td>>25</td> <td>0.60</td> <td>0.00</td> </tr> <tr> <td></td> <td>Map prepared</td> <td>Mac 15</td> <td>April 15</td> </tr> </tbody> </table> | | | | Category | Lambak E | CEP Niyor | | | Area in % | | 1 | 0 - 2 | 14.92 | 31.61 | 2 | 2 -6 | 50.99 | 62.82 | 3 | 6 -12 | 25.49 | 5.47 | 4 | 12 - 20 | 5.80 | 0.09 | 5 | 20 -25 | 1.46 | 0.00 | 6 | >25 | 0.60 | 0.00 | | Map prepared | Mac 15 | April 15 | |
| | Category | Lambak E | CEP Niyor | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Area in % | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 0 - 2 | 14.92 | 31.61 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 2 -6 | 50.99 | 62.82 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | 6 -12 | 25.49 | 5.47 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | 12 - 20 | 5.80 | 0.09 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | 20 -25 | 1.46 | 0.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | >25 | 0.60 | 0.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Map prepared | Mac 15 | April 15 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.6.1.3 | A visual identification or reference system shall be established for each field. - Major compliance - | Both Estates had maintained a visual identification or reference system and established for the field. This was sighted during the field visit at <i>Lambak Elaeis Estate (P2017A, P2009C P201A)</i> and <i>CEP Niyor Estate (P2005A, P2011A, P2012)</i> . Block markers were displayed in the estate corners of every field in the property. The markers consists the following information consisting the below details; <ul style="list-style-type: none"> a) Field No / Task no / b) Total Hectare Type of clone / Year planted. | | | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|---|------|------|------|------|------|------|------|-----------|--|--|--|--|--|--|-------------|--|--|--|--|--|--|----------|--|--|--|--|--|--|--------|--|--|--|--|--|--|----------------------|--|--|--|--|--|--|-----------------|--|--|--|--|--|--|------------|
| Criterion 4.6.2: Economic and financial viability plan | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.6.2.1 | <p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p>- Major compliance -</p> | <p>Business plan and budget were available and were categorised as confidential. This information was reviewed by the auditor and briefed by the respective Managers. In conclusion, both the estates business plan has demonstrated attention toward sustainable business.</p> <p>The documented business management plan named <i>5 year Plan Forecast Plantation / Budget from year 2019 until 2023</i> is made available. The business management plan among others include:</p> <ul style="list-style-type: none"> a) Mature area / Immature area b) FFB production c) Cultivation cost / Rehabilitation cost d) FFB selling price e) Capital expenditure <p>The cost of production was reviewed and compared against expenditure each year with projections in place for future years. The parameters of the projections are as follows: <i>All figures were extracted out for reason of confidentiality..</i></p> <table border="1" data-bbox="1088 1110 1904 1302"> <thead> <tr> <th>Year</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> </tr> </thead> <tbody> <tr> <td>Mature Ha</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Immature Ha</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>FFB Tons</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Yld/Ha</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Cost/Ton FFB (RM/mt)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Cost/Ha (RM/ha)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> | Year | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | Mature Ha | | | | | | | Immature Ha | | | | | | | FFB Tons | | | | | | | Yld/Ha | | | | | | | Cost/Ton FFB (RM/mt) | | | | | | | Cost/Ha (RM/ha) | | | | | | | <p>Yes</p> |
| Year | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mature Ha | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Immature Ha | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| FFB Tons | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Yld/Ha | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Cost/Ton FFB (RM/mt) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Cost/Ha (RM/ha) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | | Assessment Findings | Compliance | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|---|---|----------------|--------|-------|-------|------|------|------|---------------|----------|--------|--------|--------|-------|-------|---------------|-----------|-------|-------|-------|-------|-------|-----|
| | | Component of operating expenditure includes Administration, harvesting & collection, field upkeep, transportation, road and bridges, labour overhead, EVIT (running accounts for engines, vehicles, implements & tractors. Inclusive in the business plan is also Capital Expenditure (CAPEX) among others replacement / upgrading of building, vehicles replacement, workers amenities etc. the budget for 2019 for both the estates was sighted and verified. | | | | | | | | | | | | | | | | | | | | | | |
| 4.6.2.2 | Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance - | <p>Both estates established a replanting program spanned over a 5 year period till 2023. All programs were sighted.</p> <table border="1"> <thead> <tr> <th>Financial Year</th> <th>Estate</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>Replanting Ha</td> <td>Lambak E</td> <td>140.39</td> <td>147.31</td> <td>124.02</td> <td>81.87</td> <td>131.3</td> </tr> <tr> <td>Replanting Ha</td> <td>CEP Niyor</td> <td>56.94</td> <td>38.01</td> <td>57.10</td> <td>62.39</td> <td>72.84</td> </tr> </tbody> </table> <p>Sizes of fields identified for replanting varies subject to factors i.e hilly, yield etc. All replanting program and planning in all the Group Estates are monitored by the Replanting Unit. Assistance and audit are performed as and when required and necessary.</p> | Financial Year | Estate | 2019 | 2020 | 2021 | 2022 | 2023 | Replanting Ha | Lambak E | 140.39 | 147.31 | 124.02 | 81.87 | 131.3 | Replanting Ha | CEP Niyor | 56.94 | 38.01 | 57.10 | 62.39 | 72.84 | Yes |
| Financial Year | Estate | 2019 | 2020 | 2021 | 2022 | 2023 | | | | | | | | | | | | | | | | | | |
| Replanting Ha | Lambak E | 140.39 | 147.31 | 124.02 | 81.87 | 131.3 | | | | | | | | | | | | | | | | | | |
| Replanting Ha | CEP Niyor | 56.94 | 38.01 | 57.10 | 62.39 | 72.84 | | | | | | | | | | | | | | | | | | |
| 4.6.2.3 | The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production : cost per tonne of FFB | <p>The business management plan also known as <i>Projected Cash flow Statement</i> contained the following details:</p> <ul style="list-style-type: none"> - FFB Crop Production and yield per ha - Crop projection from 2019 until year 2028 - Cost per mt FFB with price forecast - Cash flow forecast | Yes | | | | | | | | | | | | | | | | | | | | | |

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| Criterion / Indicator | | Assessment Findings | Compliance |
|--|---|--|------------|
| | d) Price forecast e) Financial indicators : cost benefit, discounted cash flow, return on investment - Major compliance - | | |
| 4.6.2.4 | The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance - | This is reviewed on a monthly basis. All estates performance is established in P/L report. The costing is provided in the estates monthly accounts. Variation if significant from the budgeted amount is justified with reasons. | Yes |
| Criterion 4.6.3: Transparent and fair price dealing | | | |
| 4.6.3.1 | Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance - | The pricing method for products and other services such as FFB transporter has been clearly stated in the Letter of Offer (LOA) and contract agreement (e.g. scheduled of transportation rates). The contract shall be agreed upon both party prior to commencement of work. | Yes |
| 4.6.3.2 | All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance - | The payment was made by Head Office after the estates have sent the invoice to Head Office. Interview with the contractors confirmed that the payment was made appropriately and timely manner. | Yes |
| Criterion 4.6.4: Contractor | | | |
| 4.6.4.1 | Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. | Both visited estates have communicated the MSPO requirements to their contractors through stakeholders meetings. Minutes of meeting were available for verification and interview with the contractors | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|---|------------|
| | - Major compliance - | showed that they understood the intention and general requirements of the standard. | |
| 4.6.4.2 | The management shall provide evidence of agreed contracts with the contractor. - Major compliance - | The contract agreements between the estates and contractors were made available for verification. The agreements were signed by the contractors and interview with the contractors showed that there have been no breach of contract terms so far. | Yes |
| 4.6.4.3 | The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance - | Both estate visited has no objection to allow BSI auditors to verify the assessment through physical inspection if required. The contractors also have signed the letter from Sime Darby stated that all suppliers and contractors need to follow the RSPO/ISCC/MSPO guideline in accordance with the Sime Darby Plantation of Mill/Estate Quality Management System (MQMS/EQMS). | Yes |
| 4.6.4.4 | The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance - | All works performed at the estates are checked and verified by the estates personnel. Projects where tenders are issued by HQ are checked by representative from HQ usually from the Engineering Dept. | Yes |
| 4.7 Principle 7: Development of new planting | | | |
| Criterion 4.7.1: High biodiversity value | | | |
| 4.7.1.1 | Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. | There is no development of new planting at both visited estates. | Yes |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|--|------------|
| | - Major compliance - | | |
| 4.7.1.2 | No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance - | There is no development of new planting at both visited estates. | Yes |
| Criterion 4.7.2: Peat Land | | | |
| 4.7.2.1 | New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance - | There is no development of new planting at both visited estates. | Yes |
| Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA) | | | |
| 4.7.3.1 | A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance - | There is no development of new planting at both visited estates. | NA |
| 4.7.3.2 | SEIAs shall include previous land use or history and involve independent consultation as per national and state | There is no development of new planting at both visited estates. | NA |

| Criterion / Indicator | | Assessment Findings | Compliance |
|--|--|--|------------|
| | regulations, via participatory methodology which includes external stakeholders. - Major compliance - | | |
| 4.7.3.3 | The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance - | There is no development of new planting at both visited estates. | NA |
| 4.7.3.4 | Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance - | There is no development of new planting at both visited estates. | NA |
| Criterion 4.7.4: Soil and topographic information | | | |
| 4.7.4.1 | Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance - | There is no development of new planting at both visited estates. | NA |
| 4.7.4.2 | Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance - | There is no development of new planting at both visited estates. | NA |

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|---|--|------------|
| Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils | | | |
| 4.7.5.1 | Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance - | There is no development of new planting at both visited estates. | NA |
| 4.7.5.2 | Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance - | There is no development of new planting at both visited estates. | NA |
| 4.7.5.3 | Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance - | There is no development of new planting at both visited estates. | NA |
| Criterion 4.7.6: Customary land | | | |
| 4.7.6.1 | No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - Major compliance - | There is no development of new planting at both visited estates. | NA |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| 4.7.6.2 | Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance - | There is no development of new planting at both visited estates. | NA |
| 4.7.6.3 | Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - Major compliance - | There is no development of new planting at both visited estates. | NA |
| 4.7.6.4 | The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. - Major compliance - | There is no development of new planting at both visited estates. | NA |
| 4.7.6.5 | Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance - | There is no development of new planting at both visited estates. | NA |
| 4.7.6.6 | A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance - | There is no development of new planting at both visited estates. | NA |

| Criterion / Indicator | | Assessment Findings | Compliance |
|-----------------------|--|--|------------|
| 4.7.6.7 | The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance - | There is no development of new planting at both visited estates. | NA |
| 4.7.6.8 | Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance - | There is no development of new planting at both visited estates. | NA |

MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill.

| Criterion / Indicator | | Assessment Findings | Compliance |
|---|--|---|------------|
| 4.1 Principle 1: Management commitment & responsibility | | | |
| Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy | | | |
| 4.1.1.1 | Policy for the implementation of MSPO shall be established. - Major compliance - | The internal memo from Mr Tan Men Kon, Head of Plantation Sustainability & Quality Management documented the commitment Sime Darby towards MSPO implementation. The internal memo dated 8th September 2017 was issued to all Estates and Mills. The commitment is to implement and certified with MSPO by December 2017 | Yes |
| 4.1.1.2 | The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance - | The continual improvement commitment is documented in the following Management & Operation Policies: a) Quality Management Policy dated January 2015 b) Lean Six Sigma Policy dated January 2015 c) Quality Policy dated January 2015 The commitments are made by the Managing Director of Sime Darby Plantations Berhad. | Yes |
| Criterion 4.1.2 – Internal Audit | | | |
| 4.1.2.1 | Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance - | The Internal Audit Procedure (SD/SDP/PSQM/IAP) dated 01/05/2015 documented the process to conduct internal audit. The internal audit checklist is available to cover all the required MSPO requirements. The Internal Audit Procedure (SD/SDP/PSQM/IAP) dated 01/05/2015 documented the process to conduct internal | Yes |

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|--|--|--|-----|
| | | audit. This is the initial certification of MSPO. The internal audit schedule for 2019 has been planned and communicated by Regional SQM to all regions (Both Peninsular & East Malaysia Estates and Mills). The internal audit for Bkt Benut POM was conducted on 22/4/19. The audit had covered all the MSPO MS2530 elements. | |
| 4.1.2.2 | The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance - | This is available under internal audit procedure Document ID: SD/SDP/PSQM/IAP. Latest revision 01/9/2017. The internal audit report dated 22/4/19 was sighted. The auditee has responded by including the root cause analysis and corrective action plan. Mainly the issues raised were related to scheduled waste, training, HCV/Biodiversity Management Plan. The auditor has also complied to the documented procedure through issuance of audit plan to the operating units dated 10/4/19. This audit notification was sighted and verified. | Yes |
| 4.1.2.3 | Reports shall be made available to the management for their review. - Major compliance - | Reports are made available and retained for min 10 years. All reports are circulated to the estate management, Regional Office and Sime Darby Plantation HQ relevant personnel. There is a monthly SQM meeting at HQ level to review the reports' findings and performance raised in both internal and external audit. The outcome was also discussed at Regional Office. | Yes |
| Criterion 4.1.3 – Management Review | | | |
| 4.1.3.1 | The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. | A management review was conducted on 29/7/19 chaired by the Mill Manager. The minutes of meeting was sighted and verified. Discussion among other were on the following subjects; a) Mill performance, SOU meeting, SORA (Structured Oil Recovery Assessment), MA visit. | Yes |

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| | <p>- Major compliance -</p> | <p>b) Environmental performance, scheduled waste, DOE report, noise monitoring c) MSPO/RSPO activities relating to training, internal audit findings. The status of the correction and preventive actions are being discussed and reviewed.</p> <p>The committee concluded that the current implementation of MSPO is suitable, effective and will continue to be adopted. Changes if necessary will be reviewed accordingly. The discussion made during the meeting is adequate to assist the management in managing the MSPO requirement.</p> | |
| <p>Criterion 4.1.4 – Continual Improvement</p> | | | |
| <p>4.1.4.1</p> | <p>The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.</p> <p>- Major compliance -</p> | <p>Bukit Benut Mill had plans of new machinery installation for the improvement relating to the pollution and energy conservation in the current financial year 2019.</p> <p>a) ESP dust collector system – reduce dust particulate b) Ceramic membrane filter – oil recovery facilities 2.5 M c) Installation of steam turbine 1000 Kw..</p> <p>Details of the installation have reached the stage of contract award with participation of HQ personnel; from Engineering Department. The documents were sighted and verified. Projects in relation to the continual improvement are made through allocation in Capital Expenditure.</p> | <p>Yes</p> |
| <p>4.1.4.2</p> | <p>The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.</p> <p>- Major compliance -</p> | <p>This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. The management team will be informed of such development during the monthly management meetings. Dissemination of information by the RCEO</p> | <p>Yes</p> |

| | | | |
|---|---|---|-----|
| | | and RGM are transacted during the monthly Managers meetings and emails. The management continuously reviewed the estates performance and work method for a continual improvement to achieve better results. | |
| 4.2 Principle 2: Transparency | | | |
| Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements | | | |
| 4.2.1.1 | The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance - | Bukit Benut Palm Oil Mill has maintained records of requests and responses, Land titles/user rights, Safety and health plans, plans and impact assessments relating to environmental and social impact, plans for pollution prevention, records of complaints and grievances, plans for continuous improvement and make available upon request. | Yes |
| 4.2.1.2 | The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. - Major compliance - | The company has developed a procedure on Documentation and Communication under Section 3, version: 1, year 2008 where the information on sustainable activities will be made publicly available to the general public through Annual Reports, circulars, agreements, Sime Darby website and other publications. Copies of the document such as impact assessment reports and monitoring plans relating to environmental and social, pollution prevention plans, records of complaints and grievances were available on request. | Yes |
| Criterion 4.2.2 – Transparent method of communication and consultation | | | |
| 4.2.2.1 | Procedures shall be established for consultation and communication with the relevant stakeholders. | SDPB has developed a documented procedure in Sustainable Plantation Management System on handling social issues, Appendix 5, Version 1, and Issue No.1, dated 01/4/2008. The procedure has | Yes |

| | | | |
|---------------------------------------|--|--|-----|
| | - Major compliance - | detailing the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner. | |
| 4.2.2.2 | The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance - | The estate’s assistant managers were appointed to be the overall in charge for social issue and responsible for communication and consultation with the local communities and other interested parties. The roles and responsibility were also stated in the appointment letter. The appointment has been communicated internally by memo and externally through stakeholder consultation. | Yes |
| 4.2.2.3 | A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - Major compliance - | Lists of stakeholders were made available at the visited estates and last updated in June 2019. Among the stakeholders included in the lists were government agencies, contractors, suppliers, surrounding communities and NGOs. The last consultation was conducted on 4/4/2019 which covered all the operating units in SOU22. Minutes of meeting was available for verification. | Yes |
| Criterion 4.2.3 – Traceability | | | |
| 4.2.3.1 | The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance - | The implementation of traceability is guided by Sustainable Plantation Management System, Appendix 15, SOP for Sustainable Supply Chain and Traceability, ver. 2, issue 5, dated April 2019. The procedure also covers the traceability implementation for the other certification schemes such RSPO and ISCC. | Yes |
| 4.2.3.2 | The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance - | The regular inspection on compliance with the traceability system was mainly done through internal audit as mentioned in Criterion 4.1.2. | Yes |

| <p>4.2.3.3</p> | <p>The management shall identified and assign suitable employees to implement and maintain traceability system.</p> <p>- Minor compliance -</p> | <p>Based on the company’s traceability procedure Section 4.1, the overall personal in charge for the traceability is the Head of Operating Unit, i.e. in this case, the Mill Manager. The responsibility is stated in the job description.</p> | <p>Yes</p> | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|---|------------|---|----------|---|-------------------------------|---------|---|-----------------------------------|---------|---|--------------------------------------|-----------|---|---------------------------------|---------|---|-------------------------------|-------------|---|--------------------------|--------|---|------------------------|--------|------------|
| <p>4.2.3.4</p> | <p>Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.</p> <p>- Major compliance -</p> | <p>The records of delivery of CPO & PK to refinery and KCP were verified. The dispatch of the CPO & PK is determined by HQ Sales & Marketing and will be entered into the Sime Weigh System. The delivery records related to traceability shall be maintained for 3 to 10 years according to the SPMS SOP for Sustainable Supply Chain Traceability, dated April 2019 Clause 5.4.</p> | <p>Yes</p> | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>4.3 Principle 3: Compliance to legal requirements</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Criterion 4.3.1 – Regulatory requirements</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>4.3.1.1</p> | <p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p> | <p>Bukit Benut Palm Oil Mill continued to comply with legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and SQM sustainability team. The Mill had obtained and renewed license and permits as required by the law. The licenses/permit viewed among others were: inspection 29/7/19.</p> <table border="1" data-bbox="1126 1098 1915 1369"> <thead> <tr> <th></th> <th>Licence / Permit / Regulatory Requirement</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>MPOB License no 52815400-4000</td> <td>31/3/20</td> </tr> <tr> <td>2</td> <td>DOE – Jadual Pematuhan Ref 004747</td> <td>30/6/20</td> </tr> <tr> <td>3</td> <td>BOMBA – no 305799 – fire certificate</td> <td>Sept 2020</td> </tr> <tr> <td>4</td> <td>SPAN – span/eks/pt/800-4(1)/6/8</td> <td>7/12/19</td> </tr> <tr> <td>5</td> <td>Suruhanjaya Tenaga ref 004559</td> <td>Eff 30/5/19</td> </tr> <tr> <td>6</td> <td>Steam receiver PMT 43561</td> <td>6/8/19</td> </tr> <tr> <td>7</td> <td>Boiler No 1 JH PMD 940</td> <td>6/8/19</td> </tr> </tbody> </table> | | Licence / Permit / Regulatory Requirement | Validity | 1 | MPOB License no 52815400-4000 | 31/3/20 | 2 | DOE – Jadual Pematuhan Ref 004747 | 30/6/20 | 3 | BOMBA – no 305799 – fire certificate | Sept 2020 | 4 | SPAN – span/eks/pt/800-4(1)/6/8 | 7/12/19 | 5 | Suruhanjaya Tenaga ref 004559 | Eff 30/5/19 | 6 | Steam receiver PMT 43561 | 6/8/19 | 7 | Boiler No 1 JH PMD 940 | 6/8/19 | <p>Yes</p> |
| | Licence / Permit / Regulatory Requirement | Validity | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | MPOB License no 52815400-4000 | 31/3/20 | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | DOE – Jadual Pematuhan Ref 004747 | 30/6/20 | | | | | | | | | | | | | | | | | | | | | | | | | |
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| 5 | Suruhanjaya Tenaga ref 004559 | Eff 30/5/19 | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | Steam receiver PMT 43561 | 6/8/19 | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | Boiler No 1 JH PMD 940 | 6/8/19 | | | | | | | | | | | | | | | | | | | | | | | | | |

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|-----------------------|---|--|------------|---------------------------|--------|---|----------------------------|--------|----|---|---------|----|--------------------------------|----------|----|--|-------------|----|-------------------------------------|--------------|--|
| | | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%; text-align: center;">8</td> <td style="width: 70%;">Sterilizer no JH PMT 1959</td> <td style="width: 25%; text-align: center;">6/8/19</td> </tr> <tr> <td style="text-align: center;">9</td> <td>Air receiver A JH PMT 2917</td> <td style="text-align: center;">6/8/19</td> </tr> <tr> <td style="text-align: center;">10</td> <td>Metrology Corporation w/bridge B1226053</td> <td style="text-align: center;">24/8/19</td> </tr> <tr> <td style="text-align: center;">11</td> <td>Enakmen Air Johor 08/A/KLG/014</td> <td style="text-align: center;">31/12/19</td> </tr> <tr> <td style="text-align: center;">12</td> <td>Suruhanjaya Tenaga – Perakuan Kompetensi Penjaga Jentera 09391</td> <td style="text-align: center;">Eff 19/5/19</td> </tr> <tr> <td style="text-align: center;">13</td> <td>DOE – CePPOMETS – Engineer 1-5/7/19</td> <td style="text-align: center;">Eff 1-5/7/19</td> </tr> </table> <p>Note: Under MPOB license issued on 26/2/19 the approved FFB processed/annum is maximum 120000 mt and the actual FFB processed in 2018 was 120368MT 01/4/18 – 31/3/19 concluding compliance to the regulations. The mill was designed at 20 mt/hr.</p> | 8 | Sterilizer no JH PMT 1959 | 6/8/19 | 9 | Air receiver A JH PMT 2917 | 6/8/19 | 10 | Metrology Corporation w/bridge B1226053 | 24/8/19 | 11 | Enakmen Air Johor 08/A/KLG/014 | 31/12/19 | 12 | Suruhanjaya Tenaga – Perakuan Kompetensi Penjaga Jentera 09391 | Eff 19/5/19 | 13 | DOE – CePPOMETS – Engineer 1-5/7/19 | Eff 1-5/7/19 | |
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| 13 | DOE – CePPOMETS – Engineer 1-5/7/19 | Eff 1-5/7/19 | | | | | | | | | | | | | | | | | | | |
| <p>4.3.1.2</p> | <p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p>- Major compliance -</p> | <p>The Legal & Other Requirements Register (LORR) covers all the necessary regulatory requirements. The LORR for was reviewed on May 2019.</p> <ul style="list-style-type: none"> a) List of applicable legal and other requirements was made available during the assessment and complied in the QSHE/04/5.2.4 folder. b) Documented procedure has 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 December 2008 <p>Among others the identified applicable laws and regulations relevant to its operations included the;</p> <ul style="list-style-type: none"> a) Environmental Quality Act 1974 and its Regulations, b) Factories and Machinery Act 1967 and its Regulations, c) Occupational Safety and Health Act 1994 and its Regulations, d) Pesticides Act, 1974, e) Worker’s Minimum Standards of Housing & Amenities Act, 1990. | <p>Yes</p> | | | | | | | | | | | | | | | | | | |

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| | | <ul style="list-style-type: none"> f) Wildlife conservation Act 2010 g) Malaysian Palm Oil Board 1998 h) Holiday Act 1951 i) Passport Act 1966 j) Workers Union Act 1959 k) Estate Hospital Assistants (Registration) Act 1965 l) Petroleum (safety Measures) Act 1984 m) Fire Services Act 1984 n) Uniform Building By Laws 1986 o) Weights And Measures Act 1972 (Act 71) (Amendment 1981) | |
| <p>4.3.1.3</p> | <p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p> | <p>GSQM Department, based at Head Office is responsible to track changes in the law and the information was disseminated to all of its plantations and mills. SQM department, which is based in Kuala Lumpur, is responsible for tracking any changes to the Acts and Regulations. In addition, the CEO of Central East Region also played a role in disseminating new Acts & Regulations to all the mills and estates in the Region.</p> <ul style="list-style-type: none"> a) This was made via communication with the publisher of the documents. b) This mechanism was outlined in its procedure. c) The updating of the legal register is made on a periodical basis. d) Changes in the legal register if any are communicated to the respective CU/SOUs <p>The CU had entirely adopted the SDPB established documented system for identifying, tracking, accessing and updating the legal requirements. It had ensured that all applicable legal requirements pertaining to RSPO are established, implemented and maintained.</p> <p>The latest revision on the LORR was made in May 19 on the following changes;</p> | <p style="text-align: center;">Yes</p> |

| | | | |
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| | | <i>a) Noise Regulations 2019 – revocation of noise exposure 1989</i> | |
| 4.3.1.4 | The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. - Minor compliance - | The management appoints <i>En Ahmad Faiz Abu Bakar</i> via letter dated 27/9/17 issued by the Mill Manager for the overall in charge of the regulatory requirement – RSPO/MSP0 representative among others to monitor compliance and update changes in regulatory requirement. | Yes |
| Criterion 4.3.2 – Lands use rights | | | |
| 4.3.2.1 | The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance - | Bukit Benut POM is located inside Bukit Benut Estate land title. Land title and issues are handled by Bukit Benut Estate. | Yes |
| 4.3.2.2 | The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance - | Bukit Benut POM is located inside Bukit Benut Estate land title. Land title and issues are handled by Bukit Benut Estate. | Yes |
| 4.3.2.3 | Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance - | Fencing parameters established around the mill building complex to separate the management boundary of estate and the mill. The housing and other recreational facilities are located within the same vicinity for ease of employees’ management. | Yes |
| 4.3.2.4 | Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance - | Bukit Benut POM is located inside Bukit Benut Estate land title. Land title and issues are handled by Bukit Benut Estate. | Yes |

| Criterion 4.3.3 – Customary rights | | | |
|--|--|---|-----|
| 4.3.3.1 | Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance - | Bukit Benut POM is located inside Bukit Benut Estate land title. Land title and issues are handled by Bukit Benut Estate. | NA |
| 4.3.3.2 | Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance - | Bukit Benut POM is located inside Bukit Benut Estate land title. Land title and issues are handled by Bukit Benut Estate. | NA |
| 4.3.3.3 | Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance - | Bukit Benut POM is located inside Bukit Benut Estate land title. Land title and issues are handled by Bukit Benut Estate. | NA |
| 4.4 Principle 4: Social responsibility, health, safety and employment condition | | | |
| Criterion 4.4.1: Social Impact Assessment (SIA) | | | |
| 4.4.1.1 | Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance - | The Social Impact Assessment for SOU22 Bukit Benut for all operating units (Bukit Benut POM, Bukit Benut Estate, CEP Niyor Estate Lambak Elaeis Estate) was conducted internally by the Plantation Sustainable and Quality Management (PSQM) Team [now known as Group Sustainable and Quality Management (GSQM)]. The last SIA was conducted on 16-19/5/2016. The recommendation from the SIA report was transferred to action plans which have has the information about Areas of Concerns/Key Findings, Action Plan, Status PIC and Completion Date. | Yes |
| Criterion 4.4.2: Complaints and grievances | | | |

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| <p>4.4.2.1</p> | <p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p> | <p>A documented dispute resolution procedure is available in Mill and Estate Quality Management System Manual which is effective, timely, appropriate and open to any affected parties. The complaint and grievances is open to effected parties including internal and external stakeholders. The time frame to deal with external communications should be within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation, for communication required investigation.</p> | <p>Yes</p> |
| <p>4.4.2.2</p> | <p>The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties.</p> <p>- Major compliance -</p> | <p>The complaint and grievances are open to affected parties which includes internal and external stakeholders. The time to process the complaints or grievances is 2 weeks. Mostly the complaints received were about housing maintenance & repair by the employees. They were recorded in a log book which has the information about date, complainant, details of complain and status. There was no complaint from external stakeholders ever since the last assessment.</p> | <p>Yes</p> |
| <p>4.4.2.3</p> | <p>A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.</p> <p>- Minor compliance -</p> | <p>The operating unit managements have maintained Complaint Book and Houses Repair Record to receive any complaints or grievances from stakeholders. The complaints lodged related to housing repair were resolved accordingly and it was acknowledged by the complaints after the action has been taken.</p> | <p>Yes</p> |
| <p>4.4.2.4</p> | <p>Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.</p> <p>- Minor compliance -</p> | <p>Employees and surrounding communities were made aware on the complaints and grievances through various ways such as meeting, training and briefing. Meetings between the operating units and their relevant stakeholders were conducted from time to time. Minutes of meeting dated 4/4/2019 was available.</p> | <p>Yes</p> |

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| <p>4.4.2.5</p> | <p>Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.</p> <p>- Major compliance -</p> | <p>The mill maintained their records of complaint in a complain log book. Records for more than 24 months ago were still kept in the book.</p> | <p>Yes</p> |
| <p>Criterion 4.4.3: Commitment to contribute to local sustainable development</p> | | | |
| <p>4.4.3.1</p> | <p>Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.</p> <p>- Minor compliance -</p> | <p>Contributions to local development were made normally incorporated with the estate. In general, the contributions can be categorised to monetary donation, supplying manpower or machinery and permission to use the company's facilities such as sport field and community hall. Mostly among the recipients were nearby schools and surrounding communities.</p> | <p>Yes</p> |
| <p>Criterion 4.4.4: Employees safety and health</p> | | | |
| <p>4.4.4.1</p> | <p>An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p> | <p>The Group Occupational Safety & Health Management Policy and Plan had been established and implemented. The policy was signed by the Managing Director of Sime Darby Plantation on January 2015 and displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH Manager from Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors. Commitment to be responsibilities of both employer & employees. The policy as committed will be reviewed/ revised as deemed appropriate. In Interviews with the workers and staff during the site visit revealed that the employees have been briefed and has understood the policy.</p> | <p>Yes</p> |

| <p>4.4.4.2</p> | <p>The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements. g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept | <p>The policy has been established and elaborated in item 4.4.4.1 above. The policy amongst others has mentioned the details of the policy statement and the direction of the organisation towards implementing ESH practices. The clause "<i>A safety and health policy, which is communicated and implemented</i>" is mentioned in the policy. Safety briefing to employees & contractors was made in several training sessions inclusive of safety requirement of the organization.</p> <p>The Mill had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following;</p> <ul style="list-style-type: none"> a) Change in work process b) Revision/changes in legislative requirement c) Occurrence of accidents <p>CHRA was conducted on 2/2/19 by Assessor regn no JKPP HIE 127/171-2(166) producing a report ref no JKPP HIE 127/171-2(166) – 2019/002. HIRARC for the mill was formalized on in 2008 with review made annually. Latest being 30/4/19. The significant and routine activities for mill were covered with details as follows;</p> <table border="1" data-bbox="1122 1137 1899 1374"> <thead> <tr> <th></th> <th>Areas/Activities</th> <th></th> <th>Areas /Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reception Station–Ramp</td> <td>10</td> <td>Engine Room</td> </tr> <tr> <td>2</td> <td>Fruit Handling</td> <td>11</td> <td>Product storage /Despatch</td> </tr> <tr> <td>3</td> <td>Sterilizer</td> <td>12</td> <td>Laboratory</td> </tr> <tr> <td>4</td> <td>Threshing</td> <td>13</td> <td>Water treatment</td> </tr> <tr> <td>5</td> <td>Clarification / Oil Room</td> <td>14</td> <td>Effluent Treatment Pond</td> </tr> <tr> <td>6</td> <td>Boiler House</td> <td>15</td> <td>Compound upkeep</td> </tr> </tbody> </table> | | Areas/Activities | | Areas /Activities | 1 | Reception Station–Ramp | 10 | Engine Room | 2 | Fruit Handling | 11 | Product storage /Despatch | 3 | Sterilizer | 12 | Laboratory | 4 | Threshing | 13 | Water treatment | 5 | Clarification / Oil Room | 14 | Effluent Treatment Pond | 6 | Boiler House | 15 | Compound upkeep | <p>Yes</p> |
|-----------------------|---|--|---------------------------|------------------|--|-------------------|---|------------------------|----|-------------|---|----------------|----|---------------------------|---|------------|----|------------|---|-----------|----|-----------------|---|--------------------------|----|-------------------------|---|--------------|----|-----------------|------------|
| | Areas/Activities | | Areas /Activities | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Reception Station–Ramp | 10 | Engine Room | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Fruit Handling | 11 | Product storage /Despatch | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Sterilizer | 12 | Laboratory | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Threshing | 13 | Water treatment | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Clarification / Oil Room | 14 | Effluent Treatment Pond | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | Boiler House | 15 | Compound upkeep | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | <p>ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p> | <table border="1" data-bbox="1126 363 1908 478"> <tr> <td>7</td> <td>Security</td> <td>16</td> <td>Office</td> </tr> <tr> <td>8</td> <td>Kernel plant</td> <td>17</td> <td>General cleaning</td> </tr> <tr> <td>9</td> <td>Workshop mechanical</td> <td>18</td> <td>Weighbridge</td> </tr> </table> <p>Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative controls such as safety signage were displayed at all work stations in the mill office and workshop. In general, the control measures were appropriate to the identified risks. A person-in-charge at each site were appointed to monitor the implementation of the control measures through the 5S initiative</p> <p>The mill has an OSH program for Financial Year 2019. The program list as guided by SQM personnel includes the following activities;</p> <ul style="list-style-type: none"> a) OSH committee b) OSH program & review c) OSH inspection d) Health & Hygiene monitoring program <ul style="list-style-type: none"> - monthly medical check-up e) Safety & health training <ul style="list-style-type: none"> - fire drill & fire fighting - First Aid awareness - chemical safety training <p>The mill issued PPE to its employees for their protection at workplace. Records of PPE issued are maintained individually to all employees. PPE issued to the workers is safety helmets, safety</p> | 7 | Security | 16 | Office | 8 | Kernel plant | 17 | General cleaning | 9 | Workshop mechanical | 18 | Weighbridge | |
| 7 | Security | 16 | Office | | | | | | | | | | | | |
| 8 | Kernel plant | 17 | General cleaning | | | | | | | | | | | | |
| 9 | Workshop mechanical | 18 | Weighbridge | | | | | | | | | | | | |

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| | | <p>shoes. Special PPE for workers assigned to height, confined space. Safety shoes issued on a 6 monthly basis and recorded. During the site visit the staff/workers were noted to be equipped with their proper attire & PPE. Acknowledgement of receipt was recorded.</p> <p>The SOP of handling of chemicals is available.</p> <ul style="list-style-type: none"> a) The document was dated 26/02/17 titled "chemical safety management" 17 pages. b) Therein is shown requirement & selection of chemicals, assessment of chemicals hazards, selection of supplier and transportation of chemicals. c) Storage, handling and training of such is also stated in the procedure in accordance to OSH (USECHH 2000) The guidelines are adequate to address the requirement needed. <p>The manual of the SOP is filed and functional.</p> <p>The Mill Manager appoints En <i>En Ahmad Faiz Abu Bakar</i> via letter dated 27/9/17 issued by the Mill Manager for the overall in charge of RSPO/MSP0 representative also to include for environment/quality Management He is the Assist Engineer in the mill trained in knowledge of the mill operations at senior executive level. The Mill Manager in turn is appointed as the Chairman for the ESH committee duties among other to preside the ESH meetings. The appointment letter dated 01/8/2017 issued by the RGM was sighted and verified. The Manager subsequently assigned duties of ESH coordinator to the Assistants for the down line implementation of ESH practices in the estates.</p> | |
|--|--|--|--|

| | | <p>The Mill management conduct regular two-way communication with their employees through the quarterly ESH meeting. The dates of meeting held are recorded below.</p> <table border="1" data-bbox="1126 520 1686 660"> <thead> <tr> <th colspan="4">Bukit Benut Mill</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>25/6/19</td> <td>3</td> <td>30/1/19</td> </tr> <tr> <td>2</td> <td>30/4/19</td> <td>4</td> <td>07/12/18</td> </tr> </tbody> </table> <p>The minutes of meeting dated 25/6/19 and 30/1/19 respectively were sighted and verified. Workers during the meeting participated in the discussion mainly on housing and safety. All units adopted the agenda as released SQM. This agenda list was sighted and adequate to discuss salient issues relating safety, environmental and health. The agenda as discussed during the meeting among others includes the following;</p> <ul style="list-style-type: none"> a) <i>Laporan Pemakaian PPE</i> b) <i>Laporan Prestasi ESH/Kesihatan</i> c) <i>Laporan LatIhan & SOP/HIRARC</i> d) <i>Laporan Pematuhan Undang-Undang</i> e) <i>Laporan Pematuhan Oleh Kontraktor</i> f) <i>Laporan Kemalangan</i> g) <i>Laporan Pemeriksaan Tempat Kerja</i> h) <i>Laporan Kesihatan & Kawasan Perumahan</i> i) <i>Laporan Bahan Buangan Terjadual/Isu Alam Sekitar</i> <p>The agenda discussed in the safety meetings are adequate to address the issue relating to OSH and to update the new <i>legislative requirement for compliance</i>.</p> | Bukit Benut Mill | | | | 1 | 25/6/19 | 3 | 30/1/19 | 2 | 30/4/19 | 4 | 07/12/18 | |
|------------------|---------|--|------------------|--|--|--|---|---------|---|---------|---|---------|---|----------|--|
| Bukit Benut Mill | | | | | | | | | | | | | | | |
| 1 | 25/6/19 | 3 | 30/1/19 | | | | | | | | | | | | |
| 2 | 30/4/19 | 4 | 07/12/18 | | | | | | | | | | | | |

| | | <p><i>The procedures for accident and emergencies has been established. There is formation of ERP Team & ERP for all the identified incidences. In addition the procedures have been summarised in a chart flow form and displayed for information of all employees in the mill. They includes emergencies relating fire, explosion, oil spillages & chemical spillages</i></p> <ul style="list-style-type: none"> <i>a) Ahli J/Kuasa Pasukan Bertindak Kecemasan 2019 headed by the Mill Manager</i> <i>b) Carta Aliran Pelan Tindakan Kecemasan Semasa Kebakaran</i> <i>c) Carta Aliran Pelan Tindakan Kecemasan Semasa Letupan</i> <i>d) Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan Minyak</i> <i>e) Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan Kimia</i> <p>The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by SQM and amended to tailor to the situation differences in the estates and mills.</p> <table border="1" data-bbox="1126 1102 1843 1394"> <thead> <tr> <th></th> <th>Emergencies Situation</th> <th>Mill</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Fire Hazard</td> <td>/</td> <td>/</td> </tr> <tr> <td>2</td> <td>Injury At Site</td> <td>/</td> <td>/</td> </tr> <tr> <td>3</td> <td>CPO spillage</td> <td>/</td> <td></td> </tr> <tr> <td>4</td> <td>Dieseline spillage</td> <td>/</td> <td>/</td> </tr> <tr> <td>5</td> <td>Explosion</td> <td>/</td> <td></td> </tr> <tr> <td>6</td> <td>Poisonous animals attack</td> <td></td> <td>/</td> </tr> </tbody> </table> | | Emergencies Situation | Mill | Estate | 1 | Fire Hazard | / | / | 2 | Injury At Site | / | / | 3 | CPO spillage | / | | 4 | Dieseline spillage | / | / | 5 | Explosion | / | | 6 | Poisonous animals attack | | / | |
|---|--------------------------|---|--------|-----------------------|------|--------|---|-------------|---|---|---|----------------|---|---|---|--------------|---|--|---|--------------------|---|---|---|-----------|---|--|---|--------------------------|--|---|--|
| | Emergencies Situation | Mill | Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Fire Hazard | / | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Injury At Site | / | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | CPO spillage | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Dieseline spillage | / | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Explosion | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | Poisonous animals attack | | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <table border="1"> <tr> <td>7</td> <td>Flood</td> <td></td> <td>/</td> </tr> <tr> <td>8</td> <td>Workers' Strike</td> <td>/</td> <td>/</td> </tr> <tr> <td>9</td> <td>Electrocution /Electric shock</td> <td>/</td> <td>/</td> </tr> <tr> <td>10</td> <td>Gas Release/Leaks</td> <td>/</td> <td></td> </tr> <tr> <td>11</td> <td>Exposion Incident</td> <td>/</td> <td></td> </tr> <tr> <td>12</td> <td>Rescue/retrieval-Confined Space</td> <td>/</td> <td></td> </tr> </table> <p>ERT members will receive training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trainings are conducted by an accredited or qualified organisation who can demonstrate their suitability to provide training. Among others the training held are as follows</p> <table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>22/5/18</td> <td>First Aid</td> <td>8</td> </tr> <tr> <td>2</td> <td>2/5/19</td> <td>Fire Drill</td> <td>Entire</td> </tr> <tr> <td>3</td> <td>10/7/19</td> <td>Chemical hazard</td> <td>19</td> </tr> <tr> <td>4</td> <td>13/4/19</td> <td>CHRA Briefings</td> <td>16</td> </tr> <tr> <td>5</td> <td>14/10/18</td> <td>Chemical spillage</td> <td>12</td> </tr> <tr> <td>6</td> <td>25/7/19</td> <td>ETP – ERP exercise</td> <td>10</td> </tr> <tr> <td>7</td> <td>7/4/19</td> <td>Emergency drill ERP</td> <td>Entire</td> </tr> <tr> <td>8</td> <td>9/7/19</td> <td>BOFA–Basic Occupational Ist Aid</td> <td>7</td> </tr> </tbody> </table> <p>The trained personnel for the First Aid were among the employees working in the mill on shift. The first aid boxes were available at</p> | 7 | Flood | | / | 8 | Workers' Strike | / | / | 9 | Electrocution /Electric shock | / | / | 10 | Gas Release/Leaks | / | | 11 | Exposion Incident | / | | 12 | Rescue/retrieval-Confined Space | / | | | Date | Subject | attendees | 1 | 22/5/18 | First Aid | 8 | 2 | 2/5/19 | Fire Drill | Entire | 3 | 10/7/19 | Chemical hazard | 19 | 4 | 13/4/19 | CHRA Briefings | 16 | 5 | 14/10/18 | Chemical spillage | 12 | 6 | 25/7/19 | ETP – ERP exercise | 10 | 7 | 7/4/19 | Emergency drill ERP | Entire | 8 | 9/7/19 | BOFA–Basic Occupational Ist Aid | 7 | |
|----|---------------------------------|--|-----------|-------|--|---|---|-----------------|---|---|---|-------------------------------|---|---|----|-------------------|---|--|----|-------------------|---|--|----|---------------------------------|---|--|--|------|---------|-----------|---|---------|-----------|---|---|--------|------------|--------|---|---------|-----------------|----|---|---------|----------------|----|---|----------|-------------------|----|---|---------|--------------------|----|---|--------|---------------------|--------|---|--------|---------------------------------|---|--|
| 7 | Flood | | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | Workers' Strike | / | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | Electrocution /Electric shock | / | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 | Gas Release/Leaks | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11 | Exposion Incident | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12 | Rescue/retrieval-Confined Space | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Date | Subject | attendees | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 22/5/18 | First Aid | 8 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 2/5/19 | Fire Drill | Entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | 10/7/19 | Chemical hazard | 19 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | 13/4/19 | CHRA Briefings | 16 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | 14/10/18 | Chemical spillage | 12 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | 25/7/19 | ETP – ERP exercise | 10 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | 7/4/19 | Emergency drill ERP | Entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | 9/7/19 | BOFA–Basic Occupational Ist Aid | 7 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | <p>various points in the mill complex including laboratory, office, workshop, process control room etc.</p> <p>Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKKP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKKP 8 a mandatory requirement for submission to DOSH by Jan of the subsequent year. Cases if any are reviewed during safety meetings.</p> <table border="1" data-bbox="1124 778 1626 919"> <thead> <tr> <th colspan="4">Accident Cases</th> </tr> <tr> <th></th> <th>LTI cases</th> <th>No of LTI</th> <th>Non-LTI Cases</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>1</td> <td>8</td> <td>0</td> </tr> </tbody> </table> <p>Major case as sighted involving a worker working at the kernel station causing injury at left hand on 23/1/18. Investigation was made with recommendation made. Document was sighted and verified. Where required submissions of JKKP 6, & 8 to DOSH were complied with under the legislative requirement. Investigations and revision of HIRARC where appropriate were made accordingly. The mill submitted the JKKP 8 in Jan 18 complying with the DOSH statutory requirement.</p> | Accident Cases | | | | | LTI cases | No of LTI | Non-LTI Cases | 1 | 1 | 8 | 0 | |
|---|---|--|----------------|--|--|--|--|-----------|-----------|---------------|---|---|---|---|--|
| Accident Cases | | | | | | | | | | | | | | | |
| | LTI cases | No of LTI | Non-LTI Cases | | | | | | | | | | | | |
| 1 | 1 | 8 | 0 | | | | | | | | | | | | |
| Criterion 4.4.5: Employment conditions | | | | | | | | | | | | | | | |
| 4.4.5.1 | The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy | The "Social Policy" showcases the company's commitment to providing a workplace that is free from sexual harassment and all other forms of violence against women, workers, and community. | Yes | | | | | | | | | | | | |

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| | shall be signed by the top management and communicated to the employees. - Major compliance - | The policy also commits to providing sufficient training and development for employees to increase their awareness and enhance their skills in line with this policy. | |
| 4.4.5.2 | The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance - | SDPB has established a Social Policy, Social & Humanity Management Policy dated January 2015 where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age. Interviewed with the workers found that no discrimination has occurred in the workplace. | Yes |
| 4.4.5.3 | Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance - | Employment contracts for workers were available for verification. Pay and conditions are documented and in line with the Minimum Wage Order 2018. Sampled of employment contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. Among the sampled workers number whom payslips for June and February, 2019 were verified: 124552, 127679, 136372, 140250, 44813 and 79717. | Yes |
| 4.4.5.4 | Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance - | The contractors have signed on the contract agreement prior commencement of work in the estate. In the agreement, it was clearly stated that the contractors shall ensure their workers are paid according to legal requirements. Interview with the contractors confirmed that they understood the terms and conditions stated in the contract. Their workers were paid according to Minimum Wage Order 2018. | Yes |
| 4.4.5.5 | The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain | There is a list of employees consist of employee number, name, check roll type, joining date and status in the SAP system – Sime | Yes |

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| | <p>full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p> | Estate Mill Upstream Application (SEMUA) System Employee Master Listing. | |
| 4.4.5.6 | <p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p> | <p>Employees have been provided with employment contract which were made reference to the collective agreement between employer and employees. The collective agreement for estates were available for verification. The employees that recruited by the estates are from local, Indonesia and India. They are all under direct employment to the estates. All of them have signed on the employment contract prior to work. Details about period of contract/ probation period, position offered, wages, annual leave, allowances and etc. was stated in the employment contract.</p> | Yes |
| 4.4.5.7 | <p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p>- Major compliance -</p> | <p>All the daily attendance were recorded by punch card system on daily basis and overtime was recorded in the individual card. Besides, the summary of Mill Daily Attendance Report for every month was developed and maintained as well. Nonetheless, the recording of overtime based on attendance punch card at Bukit Benut POM can be further improved and can be reflected in the pay slips (OFI).</p> | Yes |
| 4.4.5.8 | <p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p> <p>- Major compliance -</p> | <p>The working hours are recorded using punch card system. The punch card will be verified by supervisor daily. The supervisor will input the code in the "Daily Input Form" (e.g. Normal Full Day, rest day work, paid holiday work etc.) for the payroll clerk to compile the monthly salary.</p> | Yes |
| 4.4.5.9 | <p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p>- Major compliance -</p> | <p>Hours of overtime were recorded in the payslip and rate was paid according to the regulatory requirements.</p> | Yes |

| | | | |
|------------------------|--|---|------------|
| <p>4.4.5.10</p> | <p>Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.</p> <p>- Minor compliance -</p> | <p>Among other social benefits offered by the company:</p> <ul style="list-style-type: none"> - workers insurance through NUPW subsidy - phone allowance - accommodation allowance for local workers not staying at company's quarters - retention bonus | <p>Yes</p> |
| <p>4.4.5.11</p> | <p>In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.</p> <p>- Major compliance -</p> | <p>The basic amenities and facilities at the quarters provided by the company to its workers. Electricity and potable water are obtained from the public utilities. The electricity and water bills are borne by the workers themselves.</p> <p>Generally, the workers quarters were in very good condition. In addition, line-site inspection was done by the medical or hospital assistants and reports were documented in accordance to the Workers' Minimum Standards Housing and Amenities Act 1990. The inspection reports were seen by the managers.</p> | <p>Yes</p> |
| <p>4.4.5.12</p> | <p>The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p> | <p>SDPB has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. Awareness campaign is conducted time to time through various methods such as briefing and meetings. There was no report on sexual harassment or violence case so far.</p> | <p>Yes</p> |
| <p>4.4.5.13</p> | <p>The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective</p> | <p>SDPSB has implemented Social Policy dated January 2015 where the management is committed and respect the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Union Meetings at both visited estates were regularly held and minutes of meeting were maintained. Interview</p> | <p>Yes</p> |

| | | | |
|---|--|--|-----|
| | <p>bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p> | <p>with the workers from different nationalities confirmed that they are allowed to join Union freely without any restriction.</p> | |
| 4.4.5.14 | <p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p>- Major compliance -</p> | <p>The company has developed Child Protection policy dated January 2015. Operating units are complied with the minimum age requirement. Through document reviewed on the Employee Master Listing confirmed that no employee under 18 years was recruited by the company. Interview with the workers and contractors also found that no child labour was practiced by the mill.</p> | Yes |
| Criterion 4.4.6: Training and competency | | | |
| 4.4.6.1 | <p>All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p> <p>- Major compliance -</p> | <p>The annual training program has been established and significantly covers all aspects of the MSPO requirements. There were also additional subjects including the mill operating procedures, parameters of mill produce, machinery maintenance etc. The training program also specified the target group of employees to be trained under the allocated subjects. The program mainly covers both requirement of the estates and mill in the SOU 22. The subjects for the training are issued and assisted by the PSQM personnel. The following topics included in the annual training program 2019 among others are extracted below;</p> <ul style="list-style-type: none"> a) OSH Act & regulations 1994. b) Environmental Quality Act 1974 c) USECHH 2000 d) OSH Committee and function. e) First Aid Training f) Scheduled waste training g) RSPO/MSPO training h) Water treatment | Yes |

| | | <p>i) HCV & Biodiversity training. Records of training for Bukit Benut Palm Oil Mill were sighted during this audit. Details are shown in 4.4.6.3.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|----------------|--|---|-----------|------|---------|-----------|---|---------|-----------|---|---|--------|------------|--------|---|---------|---------------------------------|--------|---|---------|------------------|--------|---|---------|-------------------|---|---|--------|---------------|--------|---|---------|---------------|---|---|---------|----------------------|--------|---|---------|------------------------|---|----|---------|-----------------|----|----|---------|----------------|----|-----|
| 4.4.6.2 | <p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p> | <p>The training needs for the mill financial year 2019 training program has been established. The details of the training needs include categories of stations, subjects, and employees group. Included in this program among others are subjects related to;</p> <ul style="list-style-type: none"> a) Environmental/safety & health policy/scheduled waste management / environmental responsibility, b) HCV & Biodiversity training c) machine handling/mill stations operations/control of process parameters d) workshop management etc | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.4.6.3 | <p>A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.</p> <p>- Minor compliance -</p> | <p>Training program is made on annual basis. It is subject for review during the financial year should need arises. These training are made to ensure employees are trained in their job and on to update on current development adopted by the organisation.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>22/5/18</td> <td>First Aid</td> <td>8</td> </tr> <tr> <td>2</td> <td>2/5/19</td> <td>Fire Drill</td> <td>Entire</td> </tr> <tr> <td>3</td> <td>20/4/19</td> <td>Environmental/Biodiversity/COBC</td> <td>Entire</td> </tr> <tr> <td>4</td> <td>23/7/19</td> <td>MSPO RSPO Policy</td> <td>Entire</td> </tr> <tr> <td>5</td> <td>15/1/19</td> <td>Induction program</td> <td>4</td> </tr> <tr> <td>6</td> <td>8/7/19</td> <td>PPE adherence</td> <td>Entire</td> </tr> <tr> <td>7</td> <td>26/7/19</td> <td>SOCSO updates</td> <td>6</td> </tr> <tr> <td>8</td> <td>10/7/19</td> <td>Hearing conservation</td> <td>Entire</td> </tr> <tr> <td>9</td> <td>29/6/19</td> <td>Weighbridge operations</td> <td>5</td> </tr> <tr> <td>10</td> <td>10/7/19</td> <td>Chemical hazard</td> <td>19</td> </tr> <tr> <td>11</td> <td>13/4/19</td> <td>CHRA Briefings</td> <td>16</td> </tr> </tbody> </table> | | Date | Subject | attendees | 1 | 22/5/18 | First Aid | 8 | 2 | 2/5/19 | Fire Drill | Entire | 3 | 20/4/19 | Environmental/Biodiversity/COBC | Entire | 4 | 23/7/19 | MSPO RSPO Policy | Entire | 5 | 15/1/19 | Induction program | 4 | 6 | 8/7/19 | PPE adherence | Entire | 7 | 26/7/19 | SOCSO updates | 6 | 8 | 10/7/19 | Hearing conservation | Entire | 9 | 29/6/19 | Weighbridge operations | 5 | 10 | 10/7/19 | Chemical hazard | 19 | 11 | 13/4/19 | CHRA Briefings | 16 | Yes |
| | Date | Subject | attendees | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 22/5/18 | First Aid | 8 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 2/5/19 | Fire Drill | Entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | 20/4/19 | Environmental/Biodiversity/COBC | Entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | 23/7/19 | MSPO RSPO Policy | Entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | 15/1/19 | Induction program | 4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | 8/7/19 | PPE adherence | Entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | 26/7/19 | SOCSO updates | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | 10/7/19 | Hearing conservation | Entire | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | 29/6/19 | Weighbridge operations | 5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 | 10/7/19 | Chemical hazard | 19 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11 | 13/4/19 | CHRA Briefings | 16 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | | | |
|--|--|----------|-----------------------------------|--------|
| | 12 | 1/11/18 | Kernel plant SOP | 2 |
| | 13 | 3/11/18 | Steriliser /ramp safety briefing | 6 |
| | 14 | 1/11/18 | Clarification /Press SOP | 3 |
| | 15 | 30/10/18 | Safe working procedure | 1 |
| | 16 | 4/10/18 | Boiler chemical guidelines | 3 |
| | 17 | 14/10/18 | Chemical spillage | 12 |
| | 18 | 8/7/19 | Tractor driving competency | 2 |
| | 19 | 7/7/19 | Workshop toolbox | 14 |
| | 20 | 25/7/19 | ETP – ERP exercise | 10 |
| | 21 | 24/7/19 | Sexual harassments | Entire |
| | 22 | 10/7/19 | Confined space regulation | Entire |
| | 23 | 7/4/19 | Emergency drill ERP | Entire |
| | 24 | 25/7/19 | Safety briefing for Contractors | 10 |
| | 25 | 4/4/19 | Town hall 7.0 | Entire |
| | 26 | 9/7/19 | BOFA–Basic Occupational Ist Aid | 7 |
| | 27 | 21/2/19 | Chemical/water treatment handling | 18 |
| | <p>Bulk of the mill training is organized during the daily briefing prior to work commencement of each shift. Mainly the issues discussed / briefed were related to mill process operations and safety compliance. These training records are maintained in a separate book and were sighted during the audit.</p> | | | |

4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services

Criterion 4.5.1: Environmental Management Plan

| | | | |
|----------------|--|--|-----|
| 4.5.1.1 | An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be | There is an Environmental Management Policy for the mill issued and endorsed in Jan 2015 by the Managing Director. Content of the policy among others mentioned that the Company is committed to | Yes |
|----------------|--|--|-----|

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| | | | |
|-----------------------|--|--|------------|
| | <p>established, effectively communicated and implemented.</p> <p>- Major compliance -</p> | <p>protecting the environment and conserving biodiversity through sustainable development. Communications to the employees are made through town hall session, safety meetings, weekly briefings. A town hall 7.0 session for the mill employees was organized. This is a common program initiated by SQM throughout the entire operating units in the SDP.</p> | |
| <p>4.5.1.2</p> | <p>The environmental management plan shall cover the following:</p> <ul style="list-style-type: none"> a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations <p>- Major compliance -</p> | <p>The plans and impact assessments relating to environmental impacts based on documents for both estates and the mill are elaborated in the following records:</p> <ul style="list-style-type: none"> a) Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, <i>(version 1; year 2008 Issue no. 1; dated 1 April 2009 Register)</i> b) Appendix 5.4.1c - Environmental Aspect and Impact Identification form <i>(version 1; year 2008 Issue no. 1; dated 1 April 2009; MR-01/EAI)</i> c) Appendix 5.4.1d – Environmental Impacts Evaluation form <i>(version 1; year 2008 issue no. 1; dated 1 April 2009; MR-02/EIE)</i> <p>The latest register being reviewed dated 01/1/19 to include the following changes and continued being formalised for 2019.</p> <ul style="list-style-type: none"> a) EQA (scheduled waste) Regulation 2005 b) EQA (clean air) Regulations 2014 <p>The environmental aspects for the mill are tabulated in the EAI master list <i>(EAI/MOM/2013/001—1ME to EAI/2015/MOM/020)</i> reviewable on 1/1/19. Among others the EAIs are divided into the all stations in the mill processing as listed below. The newest added activities being the MDS and ETP (additional dust cyclone being installed.</p> <ul style="list-style-type: none"> a) the boiler stack emission, black smoke | <p>Yes</p> |

| | | <p>b) palm oil mill effluent (POME) discharge and water contamination, c) Activities related to managing of scheduled wastes and general waste. d) Activities of all operations beginning from the mill entrance ending to the effluent, EFB operations.</p> <p>Documents are maintained, sighted and verified</p> | | | | | | | | | | | | | |
|-----------------------|---|--|-------------------------------|----------------|--------------------------------|---------------|---|---------------|--|-------------------------------|---|-------------|---|-------------------------------|------------|
| <p>4.5.1.3</p> | <p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p>- Major compliance -</p> | <p>The mill monitors aspects and impacts among others the following activities This plan is available and similar to the reduction of pollution and emission. Mainly the areas relating to significant impact to the environment and the effort implemented are summarised below.</p> <table border="1" data-bbox="1124 826 1888 1364"> <thead> <tr> <th data-bbox="1124 826 1160 903"></th> <th data-bbox="1160 826 1317 903">Environ Issues</th> <th data-bbox="1317 826 1736 903">Solution Procedure/Action Plan</th> <th data-bbox="1736 826 1888 903">Main Location</th> </tr> </thead> <tbody> <tr> <td data-bbox="1124 903 1160 1129">1</td> <td data-bbox="1160 903 1317 1129">Water Quality</td> <td data-bbox="1317 903 1736 1129"> Continuous monitoring water quality at identified points of Sg Mengkibol for detection of quality/pollution Analysis made at certified laboratory Advisory/guidance from Health Ministry </td> <td data-bbox="1736 903 1888 1129">River, Water Treatment Plant,</td> </tr> <tr> <td data-bbox="1124 1129 1160 1364">2</td> <td data-bbox="1160 1129 1317 1364">Air Quality</td> <td data-bbox="1317 1129 1736 1364"> Adherence to the legislative requirement on boiler emission Prohibition of open burning Fibre and shell are used as fuel in the boiler furnace Monitoring of CEMS system </td> <td data-bbox="1736 1129 1888 1364">Boiler operation mill complex</td> </tr> </tbody> </table> | | Environ Issues | Solution Procedure/Action Plan | Main Location | 1 | Water Quality | Continuous monitoring water quality at identified points of Sg Mengkibol for detection of quality/pollution Analysis made at certified laboratory Advisory/guidance from Health Ministry | River, Water Treatment Plant, | 2 | Air Quality | Adherence to the legislative requirement on boiler emission Prohibition of open burning Fibre and shell are used as fuel in the boiler furnace Monitoring of CEMS system | Boiler operation mill complex | <p>Yes</p> |
| | Environ Issues | Solution Procedure/Action Plan | Main Location | | | | | | | | | | | | |
| 1 | Water Quality | Continuous monitoring water quality at identified points of Sg Mengkibol for detection of quality/pollution Analysis made at certified laboratory Advisory/guidance from Health Ministry | River, Water Treatment Plant, | | | | | | | | | | | | |
| 2 | Air Quality | Adherence to the legislative requirement on boiler emission Prohibition of open burning Fibre and shell are used as fuel in the boiler furnace Monitoring of CEMS system | Boiler operation mill complex | | | | | | | | | | | | |

| | | | | | | | | |
|---------|--|--|---------------------|---|----------------------------|-----|----------|-----|
| | | | | Appointment of trained personnel for Air Pollution Control. | | | | |
| | | 3 | Conductive EFB yard | Control of leachate at EFB yard An improved site construction to include concrete flooring, roofing & containment wall Enforcement of site vehicle collection area. | EFB yard | | | |
| | | 4 | Scheduled waste | Scheduled wastes are managed in accordance with the regulatory requirements. | Source of generation/store | | | |
| | | Records of periodical reporting of the listed issues were available. These were the evidence which showed that the plans been monitored. The plans were reviewed annually during the Management review / EPMC meeting where environmental issues were discussed. | | | | | | |
| 4.5.1.4 | A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance - | This is available as elaborated in item 4.5.1.3 above. | | | | Yes | | |
| 4.5.1.5 | An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. | This is available in the annual training program under subject of; <table border="1" data-bbox="1126 1326 1845 1374"> <tr> <td data-bbox="1126 1326 1182 1374"></td> <td data-bbox="1182 1326 1845 1374">Subjects</td> </tr> </table> | | | | | Subjects | Yes |
| | Subjects | | | | | | | |

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|--|---|------------|--------------------------------|---|---------------------------------------|---|---|---|---|---|----------------------------|---|-------------------------|---|------------------|---|----------------|---|---------------------------------------|----|----------------------------------|----|--------|----|-----------------------|----|-------------------------------|--|
| | <p>- Major compliance -</p> | <table border="1"> <tr><td>1</td><td>ESH Legal & Other requirements</td></tr> <tr><td>2</td><td>Safe handling of electrical equipment</td></tr> <tr><td>3</td><td>Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000</td></tr> <tr><td>4</td><td>Emergency Respond Plan Training Chemical spill, poisoning, Fire. Lightning)</td></tr> <tr><td>5</td><td>Scheduled waste management</td></tr> <tr><td>6</td><td>RSPO/ISCC/MSP0 Training</td></tr> <tr><td>7</td><td>5 S Housekeeping</td></tr> <tr><td>8</td><td>LORR Awareness</td></tr> <tr><td>9</td><td>Effective work place inspection/audit</td></tr> <tr><td>10</td><td>Machinery Maintenance/inspection</td></tr> <tr><td>11</td><td>HIRARC</td></tr> <tr><td>12</td><td>Water Treatment Plant</td></tr> <tr><td>13</td><td>Environmental Management Plan</td></tr> </table> | 1 | ESH Legal & Other requirements | 2 | Safe handling of electrical equipment | 3 | Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000 | 4 | Emergency Respond Plan Training Chemical spill, poisoning, Fire. Lightning) | 5 | Scheduled waste management | 6 | RSPO/ISCC/MSP0 Training | 7 | 5 S Housekeeping | 8 | LORR Awareness | 9 | Effective work place inspection/audit | 10 | Machinery Maintenance/inspection | 11 | HIRARC | 12 | Water Treatment Plant | 13 | Environmental Management Plan | |
| 1 | ESH Legal & Other requirements | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Safe handling of electrical equipment | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Emergency Respond Plan Training Chemical spill, poisoning, Fire. Lightning) | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Scheduled waste management | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | RSPO/ISCC/MSP0 Training | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | 5 S Housekeeping | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | LORR Awareness | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | Effective work place inspection/audit | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 | Machinery Maintenance/inspection | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11 | HIRARC | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12 | Water Treatment Plant | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 13 | Environmental Management Plan | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>4.5.1.6</p> | <p>The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.</p> <p>- Major compliance -</p> | <p>This is made through the quarterly EPMC meeting. The latest being on 08/7/19 discussing the following agenda;</p> <ul style="list-style-type: none"> a) SW management b) Issue relating to environmental c) Effluent quality d) Diesoline utilization e) Stack sampling | <p>Yes</p> | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion 4.5.2: Efficiency of energy use and use of renewable energy | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|--------|------------|---------------|--------|------------|---------|------|------|------|--------|-------|------|------|---------|-------|------|------|--------|-------|-------|------|--------|-------|-------|------|--------|-------|-------|------|--------|-------|-------|------|--------|-------|-------|------|--------|------|-------|------|----------|-------|-------|------|--------|-------|-------|------|-------|------|-------|------|------------|
| <p>4.5.2.1</p> <p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period</p> <p>- Major compliance -</p> | <p>The mill records the diesel used versus the FFB processed.</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB processed</th> <th>Diesel</th> <th>Diesel/FFB</th> </tr> </thead> <tbody> <tr> <td>July 18</td> <td>8543</td> <td>7494</td> <td>1.14</td> </tr> <tr> <td>Aug 18</td> <td>10001</td> <td>8851</td> <td>1.13</td> </tr> <tr> <td>Sept 18</td> <td>12359</td> <td>7923</td> <td>1.56</td> </tr> <tr> <td>Oct 18</td> <td>12280</td> <td>10065</td> <td>1.22</td> </tr> <tr> <td>Nov 18</td> <td>11229</td> <td>70181</td> <td>0.16</td> </tr> <tr> <td>Dec 18</td> <td>11610</td> <td>48375</td> <td>0.24</td> </tr> <tr> <td>Jan 19</td> <td>10433</td> <td>43472</td> <td>0.24</td> </tr> <tr> <td>Feb 19</td> <td>10720</td> <td>97458</td> <td>0.11</td> </tr> <tr> <td>Mac 19</td> <td>9647</td> <td>50773</td> <td>0.19</td> </tr> <tr> <td>April 19</td> <td>11063</td> <td>23539</td> <td>0.47</td> </tr> <tr> <td>May 19</td> <td>11063</td> <td>48101</td> <td>0.23</td> </tr> <tr> <td>Jun19</td> <td>9466</td> <td>41158</td> <td>0.23</td> </tr> </tbody> </table> | | Month | FFB processed | Diesel | Diesel/FFB | July 18 | 8543 | 7494 | 1.14 | Aug 18 | 10001 | 8851 | 1.13 | Sept 18 | 12359 | 7923 | 1.56 | Oct 18 | 12280 | 10065 | 1.22 | Nov 18 | 11229 | 70181 | 0.16 | Dec 18 | 11610 | 48375 | 0.24 | Jan 19 | 10433 | 43472 | 0.24 | Feb 19 | 10720 | 97458 | 0.11 | Mac 19 | 9647 | 50773 | 0.19 | April 19 | 11063 | 23539 | 0.47 | May 19 | 11063 | 48101 | 0.23 | Jun19 | 9466 | 41158 | 0.23 | <p>Yes</p> |
| Month | FFB processed | Diesel | Diesel/FFB | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| July 18 | 8543 | 7494 | 1.14 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug 18 | 10001 | 8851 | 1.13 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sept 18 | 12359 | 7923 | 1.56 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct 18 | 12280 | 10065 | 1.22 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nov 18 | 11229 | 70181 | 0.16 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dec 18 | 11610 | 48375 | 0.24 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan 19 | 10433 | 43472 | 0.24 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb 19 | 10720 | 97458 | 0.11 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mac 19 | 9647 | 50773 | 0.19 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| April 19 | 11063 | 23539 | 0.47 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May 19 | 11063 | 48101 | 0.23 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jun19 | 9466 | 41158 | 0.23 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>The Mill consistently monitors and tabulates the data monthly of the consumption of non-renewable energy (diesel). Direct usage of diesel for the mill operations is recorded. The quantity in mt is divided over the mt FFB processed (ratio) during the month. The performance is measured by this ratio to indicate the level of performance. The data is compiled for comparison and control for future improvement with aim of gradual reduction of diesel. There were measures as shown in the energy management plan to reduce and eliminate wastages among others as follows;</p> <ul style="list-style-type: none"> a) To ensure optimum FFB ramp balance to commence processing b) Timely servicing of vehicles to ensure efficient use of diesel & avoid leakages | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <p>c) Regular servicing of turbine for a better efficiency and to minimise running of gen-set</p> <p>d) Educate employees on fuel saving practices.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|----------------|--|--|-----------|---------------|-----------------------|-----------|-----------|-----------------------|---------|------|------|------|------|------|--------|-------|------|------|------|------|---------|-------|------|------|------|------|--------|-------|------|------|------|------|--------|-------|------|------|------|------|--------|-------|------|------|------|------|--------|-------|------|------|------|------|--------|-------|------|------|------|------|--------|------|------|------|------|------|----------|-------|------|------|------|------|--------|-------|------|------|------|------|-------|------|------|------|------|------|-----|
| 4.5.2.2 | <p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p>- Major compliance -</p> | <p>The mill records the following data and tabulated the ratio against the FFB processed to determine the efficiency of their operations;</p> <p>a) all the diesel used (non-renewable) for the mill operations</p> <p>b) fibre/shell (renewable)</p> <p>In this relation the following data were sighted and verified.</p> <p>The details as provided in 4.5.2.3 below</p> | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.5.2.3 | <p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p> | <p>The fibre and shell are used in the boiler for fuel recycled in the process system. Surplus quantity of shell/fibre are delivered to estates for multi purposes or sold to outside buyers. EFB is used in the estates for mulching. Details of renewable energy fibre/shell utilization are recorded below</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB processed</th> <th>CPO/ mt</th> <th>Fiber/ mt</th> <th>Shell/ mt</th> <th>Shell & fiber/ CPO mt</th> </tr> </thead> <tbody> <tr><td>July 18</td><td>8543</td><td>1762</td><td>5980</td><td>2563</td><td>4.85</td></tr> <tr><td>Aug 18</td><td>10001</td><td>2103</td><td>7001</td><td>3000</td><td>4.76</td></tr> <tr><td>Sept 18</td><td>12359</td><td>2534</td><td>8652</td><td>3707</td><td>4.88</td></tr> <tr><td>Oct 18</td><td>12280</td><td>2512</td><td>8596</td><td>3684</td><td>4.89</td></tr> <tr><td>Nov 18</td><td>11229</td><td>2350</td><td>7860</td><td>3369</td><td>4.78</td></tr> <tr><td>Dec 18</td><td>11610</td><td>2446</td><td>8127</td><td>3483</td><td>4.75</td></tr> <tr><td>Jan 19</td><td>10433</td><td>2235</td><td>7303</td><td>3130</td><td>4.67</td></tr> <tr><td>Feb 19</td><td>10720</td><td>2315</td><td>7504</td><td>3216</td><td>4.63</td></tr> <tr><td>Mac 19</td><td>9647</td><td>2038</td><td>5753</td><td>2894</td><td>4.73</td></tr> <tr><td>April 19</td><td>11063</td><td>2205</td><td>7502</td><td>3215</td><td>4.86</td></tr> <tr><td>May 19</td><td>11063</td><td>2281</td><td>7744</td><td>3319</td><td>4.85</td></tr> <tr><td>Jun19</td><td>9466</td><td>1951</td><td>6623</td><td>2839</td><td>4.85</td></tr> </tbody> </table> | Month | FFB processed | CPO/ mt | Fiber/ mt | Shell/ mt | Shell & fiber/ CPO mt | July 18 | 8543 | 1762 | 5980 | 2563 | 4.85 | Aug 18 | 10001 | 2103 | 7001 | 3000 | 4.76 | Sept 18 | 12359 | 2534 | 8652 | 3707 | 4.88 | Oct 18 | 12280 | 2512 | 8596 | 3684 | 4.89 | Nov 18 | 11229 | 2350 | 7860 | 3369 | 4.78 | Dec 18 | 11610 | 2446 | 8127 | 3483 | 4.75 | Jan 19 | 10433 | 2235 | 7303 | 3130 | 4.67 | Feb 19 | 10720 | 2315 | 7504 | 3216 | 4.63 | Mac 19 | 9647 | 2038 | 5753 | 2894 | 4.73 | April 19 | 11063 | 2205 | 7502 | 3215 | 4.86 | May 19 | 11063 | 2281 | 7744 | 3319 | 4.85 | Jun19 | 9466 | 1951 | 6623 | 2839 | 4.85 | Yes |
| Month | FFB processed | CPO/ mt | Fiber/ mt | Shell/ mt | Shell & fiber/ CPO mt | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| July 18 | 8543 | 1762 | 5980 | 2563 | 4.85 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug 18 | 10001 | 2103 | 7001 | 3000 | 4.76 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sept 18 | 12359 | 2534 | 8652 | 3707 | 4.88 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct 18 | 12280 | 2512 | 8596 | 3684 | 4.89 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nov 18 | 11229 | 2350 | 7860 | 3369 | 4.78 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dec 18 | 11610 | 2446 | 8127 | 3483 | 4.75 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan 19 | 10433 | 2235 | 7303 | 3130 | 4.67 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Mac 19 | 9647 | 2038 | 5753 | 2894 | 4.73 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| April 19 | 11063 | 2205 | 7502 | 3215 | 4.86 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| | | <p>In summary the total consumption of both shell and fibre over the CPO production is at an average of 4.85. When the renewable energy consumption is maximized the utilization of non-renewable is reduced.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|---|--|---------------|---------|---|------------|--|---|----------------|---|---|------------------|--|---|--------|------------------------------------|--|---------------|---------|---|-------------|-----------------------|---|---------------|--|---|----------------------|-------------------------------|------------|
| <p>Criterion 4.5.3: Waste management and disposal</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>4.5.3.1</p> | <p>All waste products and sources of pollution shall be identified and documented. - Major compliance -</p> | <p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2019.</p> <p>a) The waste generated from the mill operations as shown below;</p> <table border="1" data-bbox="1126 815 1883 1043"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Schd waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> <tr> <td>2</td> <td>Domestic waste</td> <td>rubbish from the mill complex and employees' quarters</td> </tr> <tr> <td>3</td> <td>Industrial waste</td> <td>Fibre, palm kernel shell, boiler ash, scrap iron</td> </tr> <tr> <td>4</td> <td>Sewage</td> <td>Sewage from housing/office complex</td> </tr> </tbody> </table> <p>b) The pollution identified from the mill activities</p> <table border="1" data-bbox="1126 1137 1883 1281"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke</td> <td>Emission from Boilers</td> </tr> <tr> <td>2</td> <td>Odour & gases</td> <td>Activities from the effluent treatment</td> </tr> <tr> <td>3</td> <td>Leakage of lubricant</td> <td>Storage & vehicle maintenance</td> </tr> </tbody> </table> | | Type of waste | Details | 1 | Schd waste | Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries | 2 | Domestic waste | rubbish from the mill complex and employees' quarters | 3 | Industrial waste | Fibre, palm kernel shell, boiler ash, scrap iron | 4 | Sewage | Sewage from housing/office complex | | Type of waste | Details | 1 | Black smoke | Emission from Boilers | 2 | Odour & gases | Activities from the effluent treatment | 3 | Leakage of lubricant | Storage & vehicle maintenance | <p>Yes</p> |
| | Type of waste | Details | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| | Type of waste | Details | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Black smoke | Emission from Boilers | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Odour & gases | Activities from the effluent treatment | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Leakage of lubricant | Storage & vehicle maintenance | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| <p>4.5.3.2</p> | <p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p>- Major compliance -</p> | <p>The plan listed the waste generated from the mill operations as shown below;</p> <table border="1"> <thead> <tr> <th>Waste type</th> <th>Description</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td>1 Industrial waste</td> <td>EFB</td> <td>Sent for mulching in the estates. To ensure and submit EFB disposal schedule and location every month To dispose EFB within 14 days upon storage To ensure no open burning activity on EFB and mill waste To design EFB storage area in ensuring no spillage of leachate into monsoon drain.</td> </tr> <tr> <td></td> <td>Scrap iron</td> <td>Dispose as sale to assigned vendor by Regional office. Recycle where appropriate for workshop maintenance</td> </tr> <tr> <td></td> <td>POME</td> <td>Treated in effluent plant. The final discharge from the treatment plant is used for land discharge. Effluent quality monitoring on monthly basis. The monitoring of the effluent discharge is reported to DOE on monthly and quarterly basis. This practice is accordance with the requirements in the written approval issued by DOE. Review of the results revealed that the quality of the effluent discharge is in within the regulatory limit. The BOD level has been revised by DOE</td> </tr> </tbody> </table> | Waste type | Description | Action to be taken | 1 Industrial waste | EFB | Sent for mulching in the estates. To ensure and submit EFB disposal schedule and location every month To dispose EFB within 14 days upon storage To ensure no open burning activity on EFB and mill waste To design EFB storage area in ensuring no spillage of leachate into monsoon drain. | | Scrap iron | Dispose as sale to assigned vendor by Regional office. Recycle where appropriate for workshop maintenance | | POME | Treated in effluent plant. The final discharge from the treatment plant is used for land discharge. Effluent quality monitoring on monthly basis. The monitoring of the effluent discharge is reported to DOE on monthly and quarterly basis. This practice is accordance with the requirements in the written approval issued by DOE. Review of the results revealed that the quality of the effluent discharge is in within the regulatory limit. The BOD level has been revised by DOE | <p>Yes</p> |
|-----------------------|--|---|------------|-------------|--------------------|--------------------|-----|--|--|------------|--|--|------|---|------------|
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| | Scrap iron | Dispose as sale to assigned vendor by Regional office. Recycle where appropriate for workshop maintenance | | | | | | | | | | | | | |
| | POME | Treated in effluent plant. The final discharge from the treatment plant is used for land discharge. Effluent quality monitoring on monthly basis. The monitoring of the effluent discharge is reported to DOE on monthly and quarterly basis. This practice is accordance with the requirements in the written approval issued by DOE. Review of the results revealed that the quality of the effluent discharge is in within the regulatory limit. The BOD level has been revised by DOE | | | | | | | | | | | | | |

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|---------|--|---|-----------------|--|---|-----|
| | | | | Boiler ash | Disposed to designated dumping site near holding pond Daily leveling monthly using backhoe. | |
| 4.5.3.3 | The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed | 2 | Scheduled Waste | SW305/306/102/410/109 SW 409/410/322/429 | Clean and tidy storage area Separation of type SW using labels 10cm x 10cm To ensure spillage trap functions effectively Monthly stock verification by executives Ensure inventory not exceeding 180 days / 20 mt Follow approved consignment note and update in ESWIS Provide training to the SW handlers. | Yes |
| | | 3 | Domestic Waste | Rubbish/ garden waste | Disposal made 2x /week for both mill/estate on a different day. Encourage 3R program – disposal via estate landfill. Provide adequate dustbins line sites /office complex Weekly inspection by MA/executives Awareness on hygiene. | |
| | | | | Sewage | Provide adequate washrooms/toilets at mill and line sites To ensure employees' quarters equipped with appropriate septic tank Cleaning/desludging septic tank done by appointed contractor. | |
| | | | | | The SOP for handling the used chemicals under this classification are documented under operational control procedure dated 26/2/2015 of 53 pages. The document is titled as <i>Document title scheduled waste (hazardous waste) management document ID SD/SDP/PSQM (ESH)/203-EN1</i> . The document is sighted, and | |

| | <p>as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p>- Major compliance -</p> | <p>details of the handling is given for the all the identified SW and used chemicals</p> <table border="1" data-bbox="1126 488 1908 580"> <thead> <tr> <th></th> <th>Date</th> <th>SW410</th> <th>SW409</th> <th>SW109</th> <th>SW430</th> <th>SW322</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>21/3/19</td> <td>0.068</td> <td>0.300</td> <td>0.032</td> <td>0.028</td> <td>0.082</td> </tr> </tbody> </table> <p>Despatches are made to M/s Kualiti Alam Sdn Bhd.</p> | | Date | SW410 | SW409 | SW109 | SW430 | SW322 | 1 | 21/3/19 | 0.068 | 0.300 | 0.032 | 0.028 | 0.082 | |
|--|--|---|------------|---------------|-------------|-------|-------------|--|-------|---------------|--|------------|----------------------|-------------------------------|------------|-------|--|
| | Date | SW410 | SW409 | SW109 | SW430 | SW322 | | | | | | | | | | | |
| 1 | 21/3/19 | 0.068 | 0.300 | 0.032 | 0.028 | 0.082 | | | | | | | | | | | |
| <p>4.5.3.4</p> | <p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p> <p>- Minor compliance -</p> | <p>Domestic wastes are disposed to the Bukit Benut Estate land fill site P2000. Collection made at a centralized point in the mill 2x-3x/week.</p> | <p>Yes</p> | | | | | | | | | | | | | | |
| <p>Criterion 4.5.4: Reduction of pollution and emission</p> | | | | | | | | | | | | | | | | | |
| <p>4.5.4.1</p> | <p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.</p> <p>- Major compliance -</p> | <p>The pollution identified from the mill activities</p> <table border="1" data-bbox="1126 957 1845 1098"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke</td> <td>Emission from Boilers</td> </tr> <tr> <td>2</td> <td>Odour & gases</td> <td>Activities from the effluent treatment</td> </tr> <tr> <td>3</td> <td>Leakage of lubricant</td> <td>Storage & vehicle maintenance</td> </tr> </tbody> </table> | | Type of waste | Details | 1 | Black smoke | Emission from Boilers | 2 | Odour & gases | Activities from the effluent treatment | 3 | Leakage of lubricant | Storage & vehicle maintenance | <p>Yes</p> | | |
| | Type of waste | Details | | | | | | | | | | | | | | | |
| 1 | Black smoke | Emission from Boilers | | | | | | | | | | | | | | | |
| 2 | Odour & gases | Activities from the effluent treatment | | | | | | | | | | | | | | | |
| 3 | Leakage of lubricant | Storage & vehicle maintenance | | | | | | | | | | | | | | | |
| <p>4.5.4.2</p> | <p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p>- Major compliance -</p> | <p>The action plan to reduce the pollutions are as follows;</p> <table border="1" data-bbox="1126 1161 1845 1382"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke</td> <td>To monitor the condition of dust cyclone every 3 months To carry out boiler furnace cleaning every week</td> </tr> <tr> <td>2</td> <td>Odour & gases</td> <td>To maintain proper feeding into digestion process of effluent to</td> </tr> </tbody> </table> | | Type of waste | Action Plan | 1 | Black smoke | To monitor the condition of dust cyclone every 3 months To carry out boiler furnace cleaning every week | 2 | Odour & gases | To maintain proper feeding into digestion process of effluent to | <p>Yes</p> | | | | | |
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| | | <table border="1"> <tr> <td data-bbox="1122 363 1173 480"></td> <td data-bbox="1173 363 1429 480"></td> <td data-bbox="1429 363 1845 480">prevent severe and unpleasant odour Maintain 1:1 ratio of acidification process</td> </tr> <tr> <td data-bbox="1122 480 1173 568">3</td> <td data-bbox="1173 480 1429 568">Leakage of lubricant</td> <td data-bbox="1429 480 1845 568">Ensure SOP to be strictly followed To place all lubricant oil drum on metal trays.</td> </tr> </table> <p>All efforts and action plan for the identified pollutants and emission above is adequate to comply with the requirement. All identified issues have significant impacts to the environment. The mill also monitored and maintained records on Palm GHG. This compilation is made at Head Office level and made for the entire SOU.</p> | | | prevent severe and unpleasant odour Maintain 1:1 ratio of acidification process | 3 | Leakage of lubricant | Ensure SOP to be strictly followed To place all lubricant oil drum on metal trays. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|---|--|-------------|---------|--|--------|----------------------|---|--|------|------|------|-----|-----|------|------|-----|-----|--|------|------|------|--------------|--|-------|------|------|------------------|--|------|------|------|--------------|--|------|------|------|------------|--|-----|-----|-----|------------|
| | | prevent severe and unpleasant odour Maintain 1:1 ratio of acidification process | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Leakage of lubricant | Ensure SOP to be strictly followed To place all lubricant oil drum on metal trays. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>4.5.4.3</p> | <p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p>- Major compliance -</p> | <p>The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No over flow was observed, and flow meter reading was recorded daily. The mill monitoring the effluent and submits to DOE through '<i>Borang Penyata Suku Tahunan</i>'. The Mill DOE license was for land application and the requirement is for the BOD to be less than 100 mg/l. The results from final discharge were compliance within parameter limit. <i>Jadual Pematuhan license no 004747</i> dated 01/7/19-30/6/20</p> <table border="1"> <thead> <tr> <th>Sample date</th> <th>Std</th> <th>29/4/19</th> <th>5/9/19</th> <th>11/6/19</th> </tr> </thead> <tbody> <tr> <td>PH</td> <td></td> <td>7.80</td> <td>8.10</td> <td>8.00</td> </tr> <tr> <td>BOD</td> <td>100</td> <td>2710</td> <td>1725</td> <td>385</td> </tr> <tr> <td>COD</td> <td></td> <td>7545</td> <td>5378</td> <td>2329</td> </tr> <tr> <td>Total solids</td> <td></td> <td>16492</td> <td>9953</td> <td>9140</td> </tr> <tr> <td>Suspended solids</td> <td></td> <td>6950</td> <td>1800</td> <td>1120</td> </tr> <tr> <td>Oil & grease</td> <td></td> <td>8.00</td> <td>6.00</td> <td>7.00</td> </tr> <tr> <td>A Nitrogen</td> <td></td> <td>285</td> <td>259</td> <td>262</td> </tr> </tbody> </table> | Sample date | Std | 29/4/19 | 5/9/19 | 11/6/19 | PH | | 7.80 | 8.10 | 8.00 | BOD | 100 | 2710 | 1725 | 385 | COD | | 7545 | 5378 | 2329 | Total solids | | 16492 | 9953 | 9140 | Suspended solids | | 6950 | 1800 | 1120 | Oil & grease | | 8.00 | 6.00 | 7.00 | A Nitrogen | | 285 | 259 | 262 | <p>Yes</p> |
| Sample date | Std | 29/4/19 | 5/9/19 | 11/6/19 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PH | | 7.80 | 8.10 | 8.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BOD | 100 | 2710 | 1725 | 385 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| COD | | 7545 | 5378 | 2329 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total solids | | 16492 | 9953 | 9140 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Suspended solids | | 6950 | 1800 | 1120 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oil & grease | | 8.00 | 6.00 | 7.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| A Nitrogen | | 285 | 259 | 262 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | Total N | 870 | 375 | 345 | | | | | | | | | | | | | | | | | | |
|---|---|---|------------------------|---------------|--------------|-----|---|--------------------------------------|---|------------------------|---|---------------------------------------|---|------------------------|--------------|--------------|-----|--------|--|--|--|--|-----|
| Criterion 4.5.5: Natural water resources | | | | | | | | | | | | | | | | | | | | | | | |
| 4.5.5.1 | <p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p> | <p>The Water Management Plan for the mill has been established. It was last reviewed on 1/12/18 for the 2019 plan. Included therein are the following documents which were sighted and verified;</p> <p>Contingency plan during water shortage</p> <table border="1"> <thead> <tr> <th></th> <th>Area/incident</th> <th>Action steps</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water shortage/ prolonged dry season</td> <td>to obtain water from SYABAS to train/educate staff/workers to conserve water to seek assistance from SYABAS - to obtain treated water supply from mill's WTP</td> <td>Mill Executives /Staff</td> </tr> <tr> <td>2</td> <td>Severe water pollution/ contamination</td> <td>to obtain water from SYABAS to train/educate staff/workers to conserve water to seek assistance from SYABAS - to obtain treated water outsourced supply.</td> <td>Mill Executives /Staff</td> </tr> </tbody> </table> <p>Water reduction plan</p> <table border="1"> <thead> <tr> <th>Issues/Areas</th> <th>Action Steps</th> <th>PIC</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> | | Area/incident | Action steps | PIC | 1 | Water shortage/ prolonged dry season | to obtain water from SYABAS to train/educate staff/workers to conserve water to seek assistance from SYABAS - to obtain treated water supply from mill's WTP | Mill Executives /Staff | 2 | Severe water pollution/ contamination | to obtain water from SYABAS to train/educate staff/workers to conserve water to seek assistance from SYABAS - to obtain treated water outsourced supply. | Mill Executives /Staff | Issues/Areas | Action Steps | PIC | Status | | | | | Yes |
| | Area/incident | Action steps | PIC | | | | | | | | | | | | | | | | | | | | |
| 1 | Water shortage/ prolonged dry season | to obtain water from SYABAS to train/educate staff/workers to conserve water to seek assistance from SYABAS - to obtain treated water supply from mill's WTP | Mill Executives /Staff | | | | | | | | | | | | | | | | | | | | |
| 2 | Severe water pollution/ contamination | to obtain water from SYABAS to train/educate staff/workers to conserve water to seek assistance from SYABAS - to obtain treated water outsourced supply. | Mill Executives /Staff | | | | | | | | | | | | | | | | | | | | |
| Issues/Areas | Action Steps | PIC | Status | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <table border="1"> <tr> <td>1</td> <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> <td>Mill Engineer</td> <td>On-going</td> </tr> <tr> <td>2</td> <td>Re-streaming</td> <td>Re stream from sterilizer condensate pit for dilution</td> <td>Mill Engineer</td> <td>On-going</td> </tr> </table> <p>Identification & management of waste water</p> <table border="1"> <thead> <tr> <th></th> <th>location</th> <th>Wastewater produced</th> <th>Treatment/containment</th> <th>Reuse/recycle/disposal method</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Processing stations</td> <td>Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water</td> <td>Oil recovery/ETP</td> <td>Recover into system</td> </tr> <tr> <td>2</td> <td>Boiler</td> <td>Blow down, cleaning water</td> <td>Sludge pit, ETP</td> <td>Monsoon drain</td> </tr> <tr> <td></td> <td>Process ramp</td> <td>Rainfall runoff</td> <td>Sedimentation trap</td> <td>Monsoon drain</td> </tr> <tr> <td>3</td> <td>Engine room</td> <td>Steam condensate, turbine cooling water</td> <td>Monsoon drain, recycled tank</td> <td>Monsoon drain</td> </tr> <tr> <td>4</td> <td>Laboratory</td> <td>Cleaning water</td> <td>Process drain</td> <td>Monsoon drain</td> </tr> </tbody> </table> | 1 | 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 | Mill Engineer | On-going | 2 | Re-streaming | Re stream from sterilizer condensate pit for dilution | Mill Engineer | On-going | | location | Wastewater produced | Treatment/containment | Reuse/recycle/disposal method | 1 | Processing stations | Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water | Oil recovery/ETP | Recover into system | 2 | Boiler | Blow down, cleaning water | Sludge pit, ETP | Monsoon drain | | Process ramp | Rainfall runoff | Sedimentation trap | Monsoon drain | 3 | Engine room | Steam condensate, turbine cooling water | Monsoon drain, recycled tank | Monsoon drain | 4 | Laboratory | Cleaning water | Process drain | Monsoon drain | |
|---|-----------------------|---|------------------------------|-------------------------------|---|---------------|----------|---|--------------|---|---------------|----------|--|----------|---------------------|-----------------------|-------------------------------|---|---------------------|--|------------------|---------------------|---|--------|---------------------------|-----------------|---------------|--|--------------|-----------------|--------------------|---------------|---|-------------|---|------------------------------|---------------|---|------------|----------------|---------------|---------------|--|
| 1 | 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 | Mill Engineer | On-going | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Re-streaming | Re stream from sterilizer condensate pit for dilution | Mill Engineer | On-going | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | location | Wastewater produced | Treatment/containment | Reuse/recycle/disposal method | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Processing stations | Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water | Oil recovery/ETP | Recover into system | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Boiler | Blow down, cleaning water | Sludge pit, ETP | Monsoon drain | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Process ramp | Rainfall runoff | Sedimentation trap | Monsoon drain | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Engine room | Steam condensate, turbine cooling water | Monsoon drain, recycled tank | Monsoon drain | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Laboratory | Cleaning water | Process drain | Monsoon drain | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | <table border="1" data-bbox="1126 362 1906 523"> <tr> <td>5</td> <td>washroom</td> <td>Toilet water, cleaning water</td> <td>Septic tank</td> <td>Supernatant to drains, sludge collected by licensed contractor.</td> </tr> </table> <p data-bbox="1126 576 1805 608">Analysis of river water <i>Sg Mengkibol</i> are made at 3 points</p> <table border="1" data-bbox="1126 667 1899 1086"> <thead> <tr> <th></th> <th></th> <th>Standard</th> <th>River upstream</th> <th>River midstream</th> <th>River downstream</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>6-9</td> <td>6.6</td> <td>6.3</td> <td>6.2</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>3</td> <td>58</td> <td><1</td> <td>2</td> </tr> <tr> <td>3</td> <td>COD</td> <td>25</td> <td>100</td> <td>8</td> <td>36</td> </tr> <tr> <td>4</td> <td>SS</td> <td>50</td> <td>30</td> <td>26</td> <td>100</td> </tr> <tr> <td>5</td> <td>AN</td> <td>0.3</td> <td><1</td> <td><1</td> <td><1</td> </tr> <tr> <td>6</td> <td>DO</td> <td>5-7</td> <td>2.26</td> <td>4.38</td> <td>4.61</td> </tr> <tr> <td>7</td> <td>P</td> <td>0.2</td> <td>0.616</td> <td>0.004</td> <td>0.024</td> </tr> </tbody> </table> <p data-bbox="1126 1139 1906 1198">Results are within the acceptable limits concluding no pollution affecting from the mill activities.</p> | 5 | washroom | Toilet water, cleaning water | Septic tank | Supernatant to drains, sludge collected by licensed contractor. | | | Standard | River upstream | River midstream | River downstream | 1 | PH | 6-9 | 6.6 | 6.3 | 6.2 | 2 | BOD | 3 | 58 | <1 | 2 | 3 | COD | 25 | 100 | 8 | 36 | 4 | SS | 50 | 30 | 26 | 100 | 5 | AN | 0.3 | <1 | <1 | <1 | 6 | DO | 5-7 | 2.26 | 4.38 | 4.61 | 7 | P | 0.2 | 0.616 | 0.004 | 0.024 | |
|-----------------------|--|--|----------------|---|------------------------------|-------------|---|--|--|----------|----------------|-----------------|------------------|---|----|-----|-----|-----|-----|---|-----|---|----|----|---|---|-----|----|-----|---|----|---|----|----|----|----|-----|---|----|-----|----|----|----|---|----|-----|------|------|------|---|---|-----|-------|-------|-------|--|
| 5 | washroom | Toilet water, cleaning water | Septic tank | Supernatant to drains, sludge collected by licensed contractor. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | Standard | River upstream | River midstream | River downstream | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | PH | 6-9 | 6.6 | 6.3 | 6.2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | BOD | 3 | 58 | <1 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | COD | 25 | 100 | 8 | 36 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | SS | 50 | 30 | 26 | 100 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | AN | 0.3 | <1 | <1 | <1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | DO | 5-7 | 2.26 | 4.38 | 4.61 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | P | 0.2 | 0.616 | 0.004 | 0.024 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>4.5.5.2</p> | <p>Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.</p> <p>- Major compliance -</p> | <p>The mill operates on a land application for the effluent discharge system.</p> | <p>Yes</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

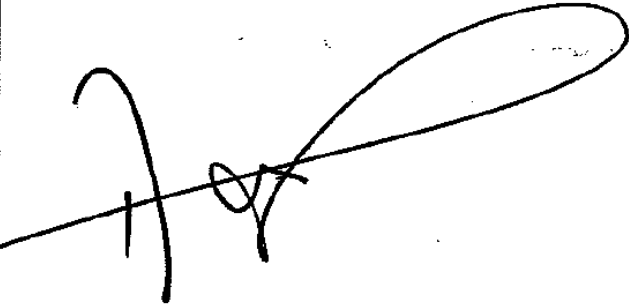
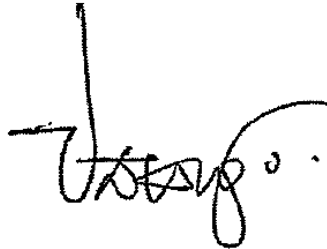
| 4.6 Principle 6: Best Practices | | | |
|---|--|---|-----|
| Criterion 4.6.1: Mill Management | | | |
| 4.6.1.1 | Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance - | <p>The mill processing system is documented in the Sustainability Plantation Management System MQMS/SQM/08 v 1 dated 01/11/2008 which includes;</p> <ul style="list-style-type: none"> a) The mill SOP, b) The Mill Quality Management Manual v.1 2008/MQMS/QMM/08. <p>These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from;</p> <ul style="list-style-type: none"> a) the reception, sterilization, threshing, pressing, b) clarification, depericarping (nut polishing) station, c) effluent, laboratory, workshop, dispatches etc. <p>In addition, there are also manuals available within the industry and MPOB that are used as guidelines.</p> | Yes |
| 4.6.1.2 | All palm oil mills shall implement best practices. - Major compliance - | <p>The monitoring of the mill process is made through the shift supervision headed by An Engineer. All process parameters are documented and summarized in a daily report. The external monitoring is made through visits by Regional General Manager, Mill Advisor, SQM and GCAD. This is to ensure compliance to Policies, procedures in relation mill operations, financial, OSH, welfare among others.</p> | Yes |
| Criterion 4.6.2: Economic and financial viability plan | | | |

| | | | |
|---|---|---|------------|
| <p>4.6.2.1</p> | <p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p>- Major compliance -</p> | <p>The annual business plan is available. The document is in the form of annual budget and the projection for 5 years (Budget year, PY2, PY3, PY4, PY5) prepared as guidance for future planning. The business plan contains;</p> <ul style="list-style-type: none"> a) FFB processed production of CPO & CPK. b) Component of operating expenditure includes <ul style="list-style-type: none"> - process labour, - maintenance external/maintenance parts - consumable/EVIT, - admin cost/labour overhead. <p>Inclusive in the business plan is also Capital Expenditure (CAPEX) among others replacement / upgrading of building/machinery, workers amenities for the mill. The M Plan for 2019 was sighted and verified. A calculation of seeking the profitability quantum was also sighted. This is a standard format provided from the Regional CEO to the Manager and treated in high confidentiality.</p> | <p>Yes</p> |
| <p>Criterion 4.6.3: Transparent and fair price dealing</p> | | | |
| <p>4.6.3.1</p> | <p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p>- Major compliance -</p> | <p>The pricing method for products and other services has been clearly stated in the Letter of Offer (LOA) and contract agreement. The contract shall be agreed upon both party prior to commencement of work.</p> | <p>Yes</p> |
| <p>4.6.3.2</p> | <p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p> | <p>The payment was made by Head Office after the mill have sent the invoice to Head Office. Interview with the contractors confirmed that the payment was made appropriately and timely manner.</p> | <p>Yes</p> |
| <p>Criterion 4.6.4: Contractor</p> | | | |

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| | | | |
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| <p>4.6.4.1</p> | <p>In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- Major compliance -</p> | <p>The mill has communicated the MSPO requirements to their contractors through stakeholders meetings. Minutes of meeting were available for verification and interview with the contractors showed that they understood the intention and general requirements of the standard.</p> | <p>Yes</p> |
| <p>4.6.4.2</p> | <p>The management shall provide evidence of agreed contracts with the contractor.</p> <p>- Major compliance -</p> | <p>The contract agreements between the mill and contractors were made available for verification. The agreements were signed by the contractors and interview with the contractors showed that there have been no breach of contract terms so far.</p> | <p>Yes</p> |
| <p>4.6.4.3</p> | <p>The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.</p> <p>- Minor compliance -</p> | <p>Both estate visited has no objection to allow BSI auditors to verify the assessment through physical inspection if required. The contractors also have signed the letter from Sime Darby stated that all suppliers and contractors need to follow the RSPO/ISCC/MSPO guideline in accordance with the Sime Darby Plantation of Mill/Estate Quality Management System (MQMS/EQMS).</p> | <p>Yes</p> |

4.0 Assessment Conclusion and Recommendation:

| Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings | |
|--|---|
| Based on the findings during the assessment, Bukit Benut Palm Oil Mill and Bukit Benut SOU 22 Estates Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Bukit Benut Palm Oil Mill and Bukit Benut SOU 22 Estates Certification Unit to be continued. | |
| Acknowledgement of Assessment Findings | Report Prepared by |
| Name: <i>ROZDIJAM KASAN.</i> SIME DARBY PLANTATION BERHAD | Name: Valence Shem |
| Company name: (Company No. 647766-V) BUKIT BENUT ESTATE P. O. BOX 513, 86005 KLUANG, JOHOR. | Company name: BSI Services Malaysia Sdn Bhd |
| Title: <i>ES/1118</i> TEL NO: 07-7722040/019-3808872 FAX NO: 077766040 | Title: Lead Auditor |
| Signature:  | Signature:  |
| Date: <i>15/11/19</i> | Date: 4/11/2019 |

Appendix A: Assessment Plan

| Date | Time | Subjects | ABH | VSH |
|------------------------|-----------|--|-----|-----|
| Wednesday 31/7/2019 | 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) | ✓ | ✓ |
| | 0900-1200 | Lambak Elaieis 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, Scheduled wastes management, worker housing, clinic, Landfill, , etc. | ✓ | ✓ |
| | 1000-1200 | Stakeholder consultations: Consultation with stakeholders such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc. | | ✓ |
| | 1200-1300 | Lunch break | | |
| | 1300-1630 | Lambak Elaieis Estate Document review P1 – P7 (MSPO Part 3): General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc. | ✓ | ✓ |
| | 1630-1700 | Interim closing briefing | ✓ | ✓ |
| Thursday 1/8/2019 | 0900-1200 | CEP Niyor 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, Scheduled wastes management, worker housing, clinic, Landfill, , etc. | ✓ | ✓ |
| | 1200-1300 | Lunch break | | |
| | 1300-1630 | CEP Niyor Estate Document review P1 – P7 (MSPO Part 3): General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc. | ✓ | ✓ |
| | 1630-1700 | Interim closing briefing | ✓ | ✓ |
| Friday 2/8/2019 | 0900-1200 | Bukit Benut 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. | ✓ | ✓ |
| | 1200-1300 | Lunch break and Friday Prayer | | |
| | 1300-1600 | Bukit Benut POM Document Review P1 – P6 (MSPO Part 4): SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc. | ✓ | ✓ |
| | 1600-1630 | Audit team discussion & preparation for closing meeting | ✓ | ✓ |

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|--|-----------|-----------------|---|---|
| | 1630-1700 | Closing meeting | ✓ | ✓ |
|--|-----------|-----------------|---|---|

Appendix B: List of Stakeholders Contacted

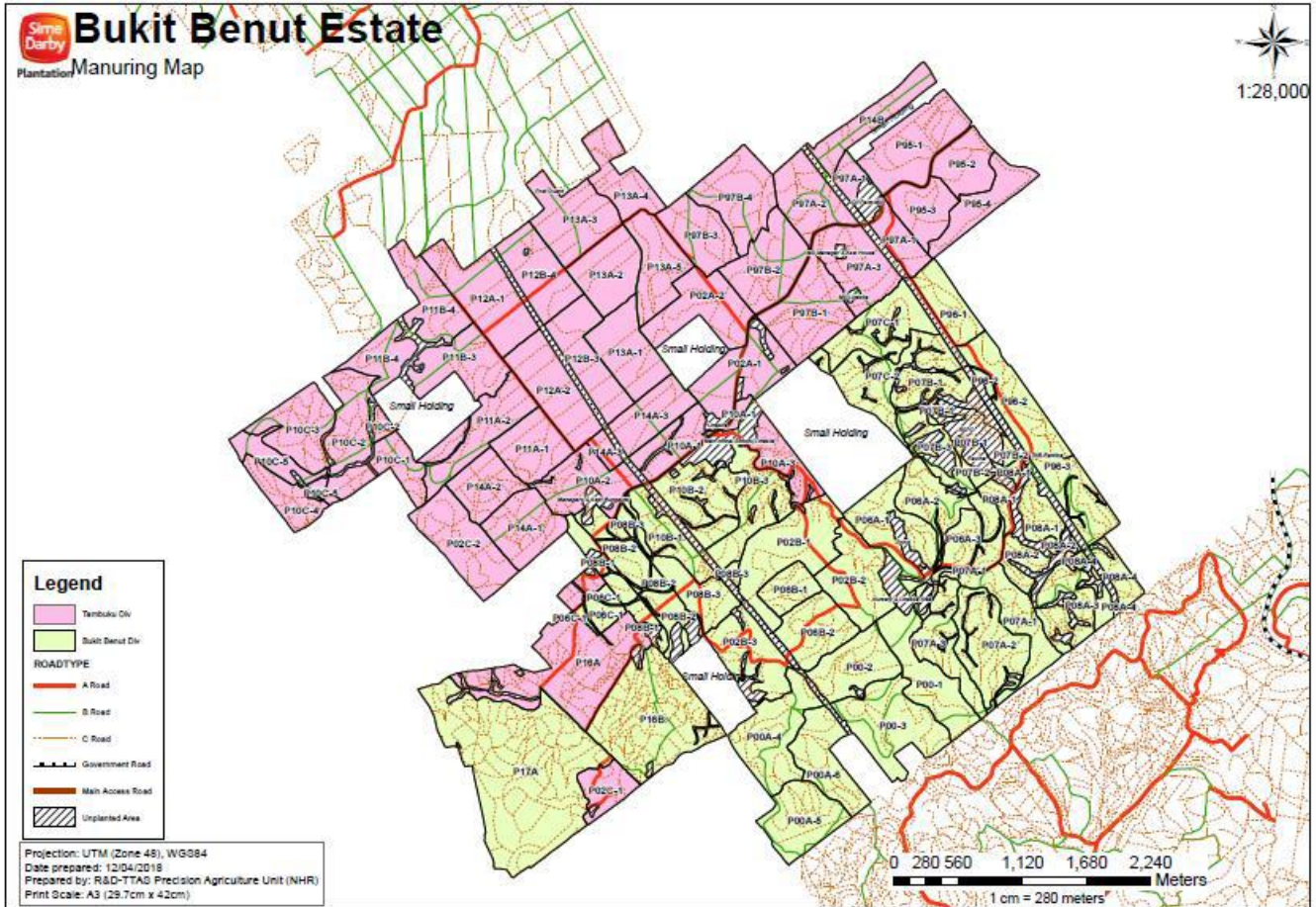
| List of Stakeholders Contacted | |
|---|--|
| <p>Internal Stakeholders</p> <p>Managers and Assistants Mill & Estate Male Mill Staff/ Workers Female Mill Staff/Workers Foreign Worker Male and Female Estate workers Workers Representatives NUPW representative Gender Committee</p> | <p>Union/Contractors/Local Communities</p> <p>Sundry shops Contractors</p> |
| <p>Government Departments</p> <p>SJK(T) Ladang Lambak</p> | <p>NGO</p> <p>Nil</p> |

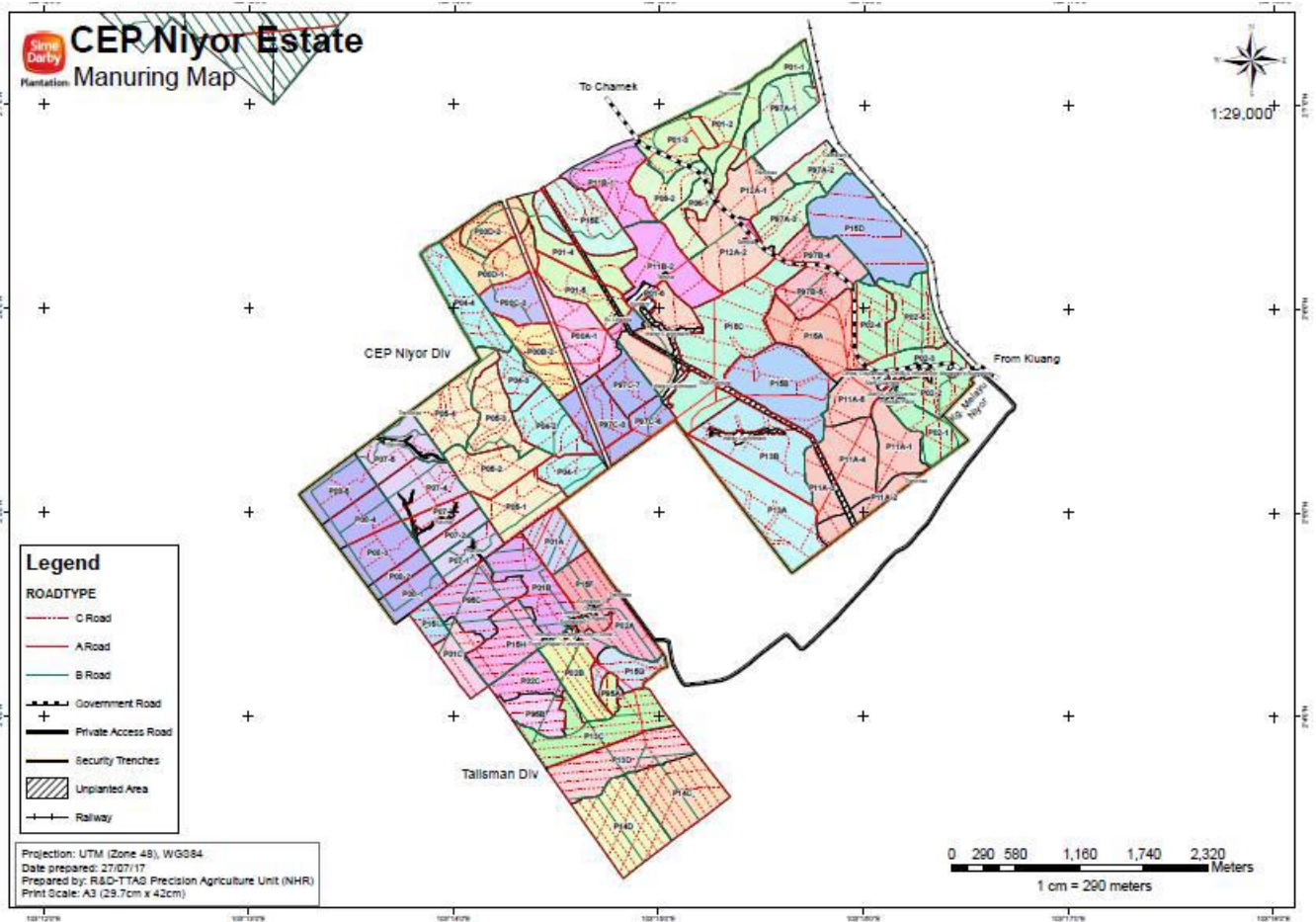
Appendix C: Smallholder Member Details

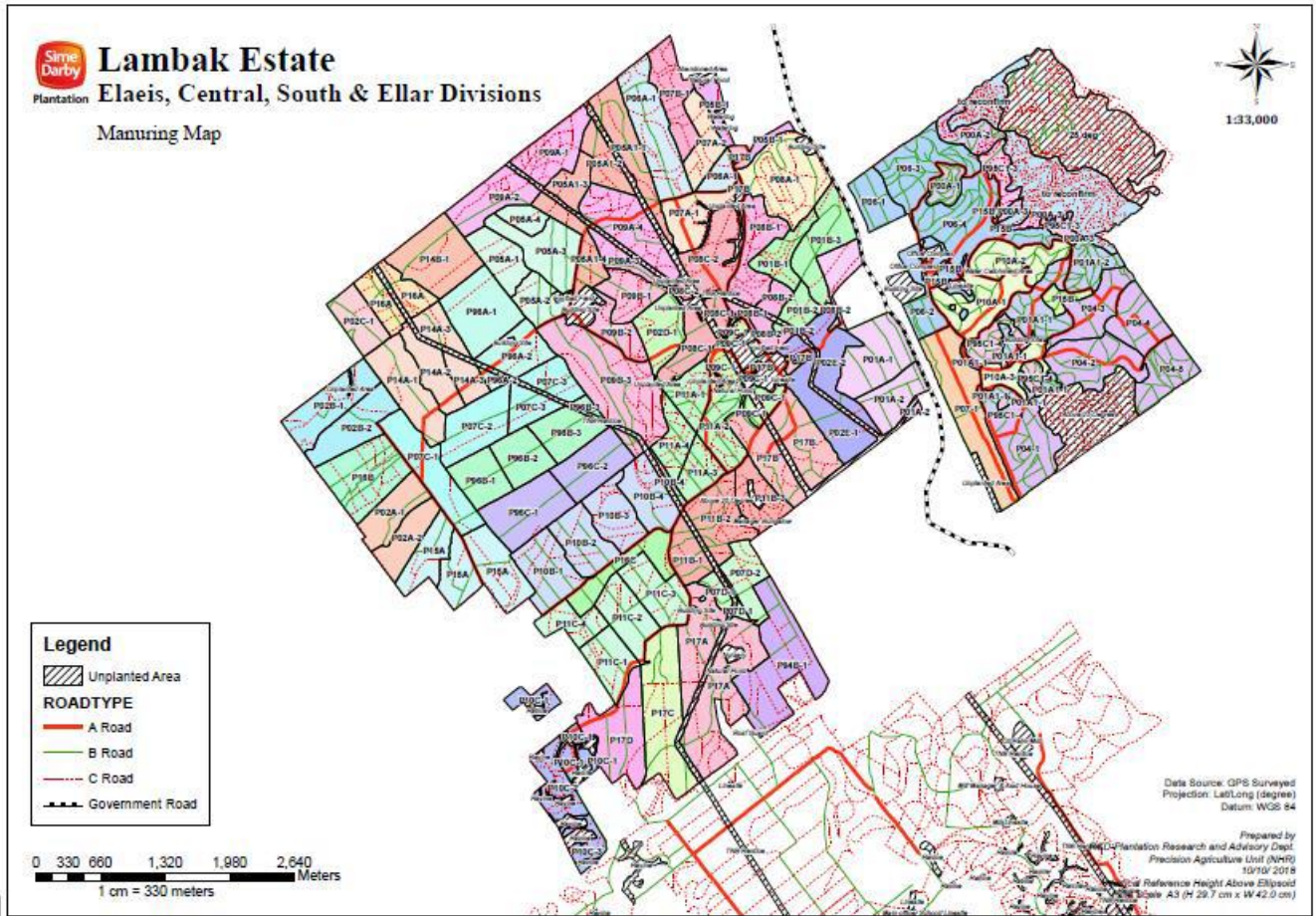
N/A

Appendix D: Location Map of Bukit Benut Palm Oil Mill Certification Unit and Supply bases









Appendix E: List of Abbreviations

| | |
|------|--|
| AN | Ammoniacal Nitrogen |
| BOD | Biological Oxygen Demand |
| CHRA | Chemical Health Risk Assessment |
| CPO | Crude Palm Oil |
| DOSH | Department of Occupational Safety & Health |
| EFB | Empty Fruit Bunch |
| EMS | Environmental Management System |
| FFB | Fresh Fruit Bunch |
| GMP | Good Manufacturing Practice |
| HCV | High Conservation Value |
| IAV | Initial Assessment Visit |
| IPM | Integrated Pest Management |
| ISCC | International Sustainable Carbon Certification |
| MSDS | Material Safety Data Sheet |
| MSPO | Malaysian Sustainable Palm Oil |
| O&G | Oil and Grease |
| PK | Palm Kernel |
| PPE | Personal Protective Equipment |
| PSQM | Plantation Sustainability and Quality Management |
| PQR | Performance Quality Rating |
| RC | Re-Certification |
| RED | Renewable Energy Directive |
| SEIA | Social & Environmental Impact Assessment |
| SIA | Social Impact Assessment |
| SOP | Standard Operating Procedure |
| SOU | Strategic Operating Unit |
| SS | Suspended Solids |
| TN | Total Nitrogen |
| TS | Total Solids |
| VFA | Volatile Fatty Acids |