

**MALAYSIAN SUSTAINABLE PALM OIL
– ANNUAL SURVEILLANCE ASSESSMENT 1
Public Summary Report**

TDM Plantation Sdn Bhd
Head Office: Level 3, Bangunan UMNO Terengganu Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu Terengganu, Malaysia
Certification Unit: Kemaman Palm Oil Mill & Plantations including Tebak Estate, Pelantoh Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate & MAIDAM Estate Location of Certification Unit: KM 121, Jerangau - Jabor Highway 24101 Kemaman, Terengganu, Malaysia

Report prepared by:
Mohamed Hidhir Zainal Abidin (Lead Auditor)

Report Number: 8814293

Assessment Conducted by:
BSI Services Malaysia Sdn Bhd,
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TABLE of CONTENTS	Page No
Section 1: Executive Summary	3
1.1 Organizational Information and Contact Person	3
1.2 Certification Information	3
1.3 Location of Certification Unit	4
1.4 Plantings & Cycle	4
1.6 Certified CPO / PK Tonnage	5
1.7 Certified Area	5
1.8 Details of Certification Assessment Scope and Certification Recommendation:	6
Section 2: Assessment Process	7
1. Assessment Program	8
Section 3: Assessment Findings	9
3.1 Details of audit results	9
3.2 Details of Nonconformities and Opportunity for improvement.....	9
3.3 Status of Nonconformities Previously Identified and OFI	11
3.4 Issues Raised by Stakeholders	17
3.5 Summary of the Nonconformities and Status.....	18
3.6 Summary of the findings by Principles and Criteria	19
Section 4: Assessment Conclusion and Recommendation	92
Appendix A: Assessment Plan	93
Appendix B: List of Stakeholders Contacted	96
Appendix C: Smallholder Member Details.....	97
Appendix D: Location and Field Map (Pelantoh, Gajah Mati and MAIDAM)	98
Appendix E: List of Abbreviations Used.....	102

Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
MPOB License	Kemaman POM: 50004190400 Expired date : 31/03/2019 Pelantoh Estate: 501374002000 Expired date : 31/03/2019 Tebak Estate:501373102000 Expired date : 31/03/2019 Jernih Estate:501868102000 Expired date : 31/10/2019 Air Putih Estate:503558102000 Expired date : 31/07/2019 Majlis Agama Islam Estate: 007400-40400 Expired date : 31/08/2019 Gajah Mati Estate:50203602000 Expired date : 31/08/2019		
Company Name	TDM Plantation Sdn Bhd		
Address	Head Office: Level 3, Bangunan UMNO Terengganu, Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu, Terengganu, Malaysia Certification unit: KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia		
Group name if applicable:	N/A		
Subsidiary of (if applicable)	N/A		
Contact Person Name	Mr Shahbudin Bin Usop		
Website	www.tdmberhad.com.my	E-mail	kpom.tdmp@tdmberhad.com.my
Telephone	09 822 6566	Facsimile	09 822 6704

1.2 Certification Information			
Certificate Number	Mill: MSPO 678572 Plantations: MSPO 686877		
Issue Date	15/12/17	Expiry date	14/12/22
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)	15-17 August 2017		
Continuous Assessment Visit Date (CAV) 1	15-17 October 2018		
Continuous Assessment Visit Date (CAV) 2	N/A		
Continuous Assessment Visit Date (CAV) 3	N/A		
Continuous Assessment Visit Date (CAV) 4	N/A		
Other Certifications			

MSPO Public Summary Report
Revision 0 (Aug 2017)

Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 587626	RSPO	BSI Services (M) Sdn Bhd	31/10/2018

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	
		Longitude	Latitude
Kemaman Palm Oil Mill	KM 121, Jerangau-Jabor Highway 24101 Kemaman, Terengganu, Malaysia	103° 14' 52.8" E	4° 24' 10.80" N
Tebak Estate	KM 121, Jerangau-Jabor Highway 24101 Kemaman, Terengganu, Malaysia	103° 13' 35.4" E	4° 25' 48.61" N
Pelantoh Estate	KM 121, Jerangau-Jabor Highway 24101 Kemaman, Terengganu, Malaysia	103° 14' 59.64" E	4° 25' 19.23" N
Jernih Estate	KM 121, Jerangau-Jabor Highway 24101 Kemaman, Terengganu, Malaysia	103° 12' 39.59" E	4° 26' 24.00" N
Air Putih Estate	KM 121, Jerangau-Jabor Highway 24101 Kemaman, Terengganu, Malaysia	103° 7' 47.99" E	4° 8' 23.99" N
Gajah Mati Estate	Bukit Besi 23000 Dungun, Terengganu, Malaysia	103° 12' 23.30" E	4° 41' 45.05" N
MAIDAM Estate	Bukit Besi 23000 Dungun, Terengganu, Malaysia	103° 12' 24.42" E	4° 37' 39.58" N

1.4 Plantings & Cycle

Estate	Age (Years) – ha				
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30
Tebak Estate	564.39	87.39	227.29	1,904.35	138.91
Pelantoh Estate	622.26	0	0	1,633.68	897.33
Jernih Estate	405.40	0	1,746.09	670.58	0
Air Putih Estate	567.40	1,510.92	0	628.17	1,336.21
Gajah Mati Estate	1,457.34	687.60	352.21	1,023.72	0
MAIDAM Estate	255.80	0	0	500.16	0
TOTAL	3,872.59	2,285.91	2,325.59	5,921.25	2,372.45

MSPO Public Summary Report
Revision 0 (Aug 2017)

1.5 Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (Oct 17 – Sept 18)	Actual (Oct 17 – Sept 18)	Forecast (Oct 18 - Sept 2019)
PELANTOH	51,430.00	40,929.80	46,873.72
TEBAK	54,000.00	47,302.91	49,538.90
JERNIH	42,300.00	39,438.57	49,891.80
AIR PUTIH	35,450.00	28,709.65	31,424.55
GAJAH MATI	31,300.00	24,427.28	32,681.86
MAIDAM	6,780.00	3,561.31	5,203.81
Total	221,260.00	184,369.52	215,614.64

1.6 Certified CPO / PK Tonnage			
Kemaman POM 60 MT/hr	Estimated (Previous Year)	Actual (Oct 17 – Sept 18)	Forecast (Oct 18 - Sept 2019)
	CPO (OER: 20.50 %)	CPO (OER: 23.21%)	CPO (OER: 21.03 %)
	45,358.30	42,798.97	45,346.37
	PK (KER: 5 %)	PK (KER: 5.33 %)	PK (KER: 5.40 %)
	11,063.00	9,830.37	11,633.15

1.7 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Tebak Estate	2,922.33	30.46	340.84	3,293.63	88.73
Pelantoh Estate	3,153.27	0.25	138.08	3,291.60	95.80
Jernih Estate	2,822.07	65.46	248.07	3,135.60	90
Air Putih Estate	4,042.70	187.70	121.58	4,351.98	94
Gajah Mati Estate	3,520.87	153.13	208.78	3,882.78	90.68
MAIDAM Estate	755.96	6.74	151.38	914.08	83.32
Total	17,217.2	443.74	1,208.73	18,869.67	91.24

**The hactarage and HCV area was different due to GIS resurvey for Kemaman CU in 2018 by internal team*

1.8 Details of Certification Assessment Scope and Certification Recommendation:

BSI Services Malaysia Sdn Bhd has conducted the Annual Surveillance Assessment of TDM Plantation Sdn Bhd – Kemaman Palm Oil Mill located in Kemaman, Terengganu comprising 6 estates, 1 palm oil mill and infrastructure

The assessment was conducted onsite to assess the compliance of the certification unit against the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder, MS 2530-4:2013 Part 4: General principles for palm oil mills and MSPO Guidance - Part 2(060814).

The onsite assessment was conducted on 15-17 October 2018.

Based on the assessment result, TDM Plantation Sdn Bhd – Kemaman Palm Oil Mill complies with the MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholder, MS 2530-4:2013 Part 4: General principles for palm oil mills and MSPO Guidance - Part 2_EDITED VERSION (100114) and recommended for certification.

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
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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 15-17 October 2018. The audit programme is included as Appendix A. The approach to the audit was to treat the mill or plantations as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, 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 and 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 $N = 1.0\sqrt{y}$ where y is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula $(1.0\sqrt{y}) \times (z)$; where 1.0 is the risk factor (may defer to 1.2 and 1.4 depending on risk), where y is total number of group members and where z is the multiplier defined by the risk assessment. 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 MSPO 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.

MSPO Public Summary Report
Revision 0 (Aug 2017)

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)
Kemaman Palm Oil Mill	√	√	√	√	√
Tebak Estate	√	-	√	-	√
Pelantoh Estate	-	√	-	√	-
Jernih Estate	√	-	√	-	√
Air Putih Estate	√	-	√	-	√
Gajah Mati Estate	-	√	-	√	-
MAIDAM Estate	-	√	-	√	-

Tentative Date of Next Visit: October 15, 2019 - October 17, 2019

Total No. of Mandays: 6

BSI Assessment Team:

Mohamed Hidhir Zainal Abidin – Lead Auditor

He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers and stakeholders consultation.

Muhamad Nagiuddin Mazeli – Team Member

He graduated with Bachelor of Science Horticulture at University Putra Malaysia. He started his career in 2009 as Researcher at Sime Darby Research Seed Centre and manage for Quality control for seed production for paddy, chilli and corn with collaboration with Malaysian Agricultural Research and Development Institute (MARDI) for 4 years. During the period, he was also involved with Nestle project on Red Rice production. He later joins the Sime Darby Plantation Berhad Sustainability Team in 2013 as Sustainability Executive. Joining the sustainability team, he managed, implemented and monitored the RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training and internal audits related to RSPO, MSPO and other certifications where applicable to the operations within Sime Darby Plantation. He is a trained Safety Officer and he managed the Occupation Safety and Health of Northern Region Sime Darby Plantation Berhad operations.

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

The nonconformity is listed below.

During the annual surveillance assessment there were 2 Major non-conformance raised. TDM Kemaman Palm Oil Mill & estates submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for the effectiveness and closed accordingly.

Major Nonconformities:		
Ref	Area/Process	Clause
1697065-201810-M1	Gajah Mati Estate (MS 2530:2013 Part 3)	4.4.4.2
Requirements:	The occupational safety and health plan shall cover the following; <ul style="list-style-type: none"> • The risks of all operations shall be assessed and documented. • Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. 	
Statement of Nonconformity:	The risk of operation and accident was not periodically reviewed effectively.	
Objective Evidence:	i) Found Paraquat Dichloride is being used by Gajah Mati Estate. Refer to permit from Department of Agriculture is 12 September 2018 (TRG/2018/PARA/118(GL)) with 200 liter and 18 March 2018 with 600 liter (TRG/2018/PARA/036(GL)) for 332.88 ha replanting area. However, based CHRA assessment dated 12 December 2017, the said chemical has not been assessed. ii) Found one accident cases JKPP 6 on 25 May 2018 Mohd Azmi with LTI 26 days. HIRARC was not reviewed after occurrence of the said accident	
Corrections:	Appointment of CHRA assessor for the re-assessment of Paraquat Dichlorate To review and updated HIRARC	

MSP0 Public Summary Report
Revision 0 (Aug 2017)

Root cause analysis:	i)CHRA was reviewed and updated. However, for item related to Paraquat Dichlorate is used at replanting area has yet to be included in the re-assessment. ii) Misunderstanding of job step in the register
Corrective Actions:	Appointment of CHRA assessor from Occumed Consultancy Sdn Bhd for the re-assessment of Paraquat Dichlorate. Report will be updated and reviewed periodically. To review HIRARC on security under patrolling section and checked during internal audit.
Assessment Conclusion:	Corrective action plan is found to be effectively implemented, thus the major NC is closed on 3/1/19. Continuous implementation will be further verified in the next assessment.

Major Nonconformities:

Ref	Area/Process	Clause
1697065-201810-M2	MAIDAM Estate (MS 2530:2013 Part 3)	4.5.1.6
Requirements:	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed	
Statement of Nonconformity:	Regular meeting on environmental quality was regularly organized.	
Objective Evidence:	No environmental meeting @ EPMC meeting carried out in 2018 at MAIDAM estate	
Corrections:	Environmental meeting will be carried out immediately	
Root cause analysis:	Environmental meeting was carried out combine with ESH meeting. However, the minute of meeting with regards to environmental was not properly recorded.	
Corrective Actions:	Environmental meeting will be carried out on quarterly basis and included in the annual plan	
Assessment Conclusion:	Corrective action plan is found to be effectively implemented, thus the major NC is closed on 3/1/19. Continuous implementation will be further verified in the next assessment.	

Noteworthy Positive Comments

1	Good cooperation among the team.
2	Good document retrieval.

3.3 Status of Nonconformities Previously Identified and OFI

Finding Reference	1512739-201708-M1	Certificate Reference	MSPO 678572
Certificate Standard	MS2530-2:2013	Clause	Part 3: 4.6.4.1
Category	Major		
Area/Process:	TDM Plantation Sdn Bhd Kemaman Certification Unit		
Details:	All estates yet to engage their contractors for understanding the MSPO requirements.		
Objective evidence:	No evidence that the estates have engage their contractors for understanding the MSPO requirements.		
Cause	Lack of awareness regarding the MSPO requirement for contractors. For current practice, we already conducted a stakeholder meeting which only involved internal stakeholder and not focusing on contractors.		
Correction / containment	To conduct a stakeholder/contractor meeting and properly recorded with pictures and list of attendance.		
Corrective action	<p>For the current and new contractors, before start work we will conduct and call for briefing / safety programme which cover MSPO requirement.</p> <p>ASA1 verification: Annual briefing to contractor was carried on 3 September 2018 concurrent during stakeholder meeting. Thus the minor NC is closed effectively on 15/10/18.</p>		
Closed?:	Yes		

Finding Reference	1512739-201708-M2	Certificate Reference	MSPO 678572
Certificate Standard	MS2530-2:2013	Clause	Part 3: 4.1.2 Criterion 2
Category	Major		
Area/Process:	TDM Plantation Sdn Bhd Kemaman Certification Unit		
Details:	Internal audit process for MSPO was not comprehensively documented and implemented.		
Objective evidence:	i) As to date there was no internal audit conducted to ensure compliance with MSPO requirements.		

MSPO Public Summary Report
Revision 0 (Aug 2017)

	<p>ii) There was no internal audit procedure for documented for MSPO. iii) There was no MSPO internal audit report generated to the management for review.</p>
Cause	Based on our record, we have already conducted internal audit. However, the audit only focusing on sustainability regarding to the safety and environment issues which are for RSPO requirements and not specific internal audit for MSPO
Correction / containment	HQ will prepare a SOP for MSPO Internal Audit and Management Review which is already done and ready for implementation.
Corrective action	<p>Following that, an annual audit plan/schedule as per SOP will be provided and followed by management review.</p> <p>ASA1 verification: Internal audit plan for 2018 was verified. Internal was carried out at Maidam Estate: 7/8/18 and Pelantoh Estate: 10/7/18. No recurrence of issues and NC is remained closed.</p>
Closed?:	Yes

Finding Reference	1512739-201708-M3	Certificate Reference	MSPO 678572
Certificate Standard	MS2530-2:2013	Clause	Part 3: 4.1.3.1
Category	Major		
Area/Process:	TDM Plantation Sdn Bhd Kemaman Certification Unit		
Details:	Management review was not effectively implemented for MSPO		
Objective evidence:	There was no management review meeting carried out as to date to review effective implementation of MSPO.		
Cause	Regarding this matter, we have conduct the monthly management meeting which conduct by HQ. However, no specific discussion regarding to MSPO matter/ issue.		
Correction / containment	Starting September 2017, management team will conduct management meeting and any issue/related document to MSPO requirement will be discussed.		
Corrective action	<p>ASA1 verification: Management review meeting was carried out on 23/9/18 for Kemaman Complex. The meeting was chaired by CEO of TDM Plantation. Review meeting is effectively implemented and the major NC is remained closed.</p>		
Closed?:	Yes		

MSPO Public Summary Report
Revision 0 (Aug 2017)

Finding Reference	1512739-201708-M4	Certificate Reference	MSPO 678572
Certificate Standard	MS2530-2:2013	Clause	Part 3: 4.6.4.1
Category	Major		
Area/Process:	TDM Plantation Sdn Bhd Kemaman Certification Unit		
Details:	All estates yet to engage their contractors for understanding the MSPO requirements		
Objective evidence:	No evidence that the estates have engage their contractors for understanding the MSPO requirements		
Cause	Lack of awareness regarding the MSPO requirement for contractors. For current practice, we already conducted a stakeholder meeting which only involved internal stakeholder and not focusing on contractors.		
Correction / containment	To conduct a stakeholder/contractor meeting and properly recorded with pictures and list of attendance.		
Corrective action	<p>For the current and new contractors, before start work we will conduct and call for briefing / safety programme which cover MSPO requirement.</p> <p>ASA1 verification: Annual briefing to contractor was carried on 3 September 2018 concurrent during stakeholder meeting. Thus the minor NC is closed effectively on 15/10/18.</p>		
Closed?:	Yes		

Finding Reference	1512739-201708-M5	Certificate Reference	MSPO 678572
Certificate Standard	MS2530-2:2013	Clause	Part 3: 4.1.2 Criterion 2
Category	Major		
Area/Process:	TDM Plantation Sdn Bhd Kemaman Certification Unit		
Details:	Internal audit process for MSPO was not comprehensively documented and implemented.		
Objective evidence:	<p>i) As to date there was no internal audit conducted to ensure compliance with MSPO requirements.</p> <p>ii) There was no internal audit procedure for documented for MSPO.</p> <p>iii) There was no MSPO internal audit report generated to the management for review</p>		

MSPO Public Summary Report
Revision 0 (Aug 2017)

Cause	Based on our record, we have already conducted internal audit. However, the audit only focusing on sustainability regarding to the safety and environment issues which are for RSPO requirements and not specific internal audit for MSPO.
Correction / containment	HQ will prepare a SOP for MSPO Internal Audit and Management Review which is already done and ready for implementation.
Corrective action	Following that, an annual audit plan/schedule as per SOP will be provided and followed by management review. ASA1 verification: Internal audit plan for 2018 was verified. Internal was carried out at Kemaman POM on 12/6/18. No recurrence of issues and NC is remained closed.
Closed?:	Yes

Finding Reference	1512739-201708-M6	Certificate Reference	MSPO 678572
Certificate Standard	MS2530-2:2013	Clause	Part 3: 4.1.3.1
Category	Major		
Area/Process:	TDM Plantation Sdn Bhd Kemaman Certification Unit		
Details:	Management review was not effectively implemented for MSPO		
Objective evidence:	There was no management review meeting carried out as to date to review effective implementation of MSPO.		
Cause	Regarding this matter, we have conduct the monthly management meeting which conduct by HQ. However, no specific discussion regarding to MSPO matter/ issue.		
Correction / containment	Starting September 2017, management team will conduct management meeting and any issue/related document to MSPO requirement will be discussed.		
Corrective action	ASA1 verification: Management review meeting was carried out on 23/9/18 for Kemaman Complex. The meeting was chaired by CEO of TDM Plantation. Review meeting is effectively implemented and the major NC is remained closed.		
Closed?:	Yes		

Finding Reference	1512739-201708-M7	Certificate Reference	MSPO 678572
Certificate Standard	MS2530-2:2013	Clause	Part 4: 4.5.1.1

MSPO Public Summary Report
Revision 0 (Aug 2017)

Category	Major
Area/Process:	TDM Plantation Sdn Bhd Kemaman Certification Unit
Details:	Environmental management plan was not effectively implemented.
Objective evidence:	Observed during site visit at Kemaman POM, discharge point no.1 was found silted. Cleaning water was mixed with oil/sludge and overflow to the nearby drain
Cause	Based on observation during site visit at Kemaman POM, discharge point no.1 was found silted. Cleaning water was mixed with oil/sludge and overflow to the nearby drain. Prior site visit, the appointed contractor had performed disposal of scrap iron from the old steriliser building. While executing the work, old loose fruits from cages leaked and slipped to nearby drain
Correction / containment	For immediate action, the drainage and location area (sampling point no.1) has been cleaned.
Corrective action	Environmental Improvement Plan/ Pollution Prevention Plan will be reviewed and updated regarding this matter. Weekly monitoring report by person in charge will be performed and documented ASA1 verification: Based on site visit at KPOM, no recurrence of issue observed during plant tour. Thus the major NC is remained closed.
Closed?:	Yes

Finding Reference	1512739-201708-N1	Certificate Reference	MSPO 678572
Certificate Standard	MS2530-2:2013	Clause	Part 3: 4.4.5.4
Category	Minor		
Area/Process:	TDM Plantation Sdn Bhd Kemaman Certification Unit		
Details:	The management did not ensure the employees of contractors are paid based on legal on industry minimum standards		
Objective evidence:	There is no evidence that the management has ensure the employees of contractors are paid based on legal on industry minimum standards		
Cause	During the briefing and before start work, the management already inform to contractor to comply regarding to the employees of contractor's paid based on legal on industry minimum standards. However, no audit to make sure their comply or not with the legal industry minimum standards.		
Correction / containment	For the immediate action, the management will give instruction order to the contractor to comply regarding this matter. Also, random audit will be carried out before end this		

MSP0 Public Summary Report
Revision 0 (Aug 2017)

	year 2017 and the sampling of pay slip from contractor employee will be made annually
Corrective action	<p>ASA1 verification: In Gajah Mati Verification for Harversting Contractor (Kitt Plantation Sdn Bhd), the wages as per record (Payment Voucher)below is align with Min Wages 2016 Reg. Nama Pekerja/Passport /Wages Ahmad Ridhon, AT541616, RM1638.28 Rusdi Rusnan, AT305609 RM 1674.65 Muhammad Khaerurrozi, AT341168, RM 1634.16 Kamran B2949965, RM1630.00</p> <p>The corrective is effective thus the minor NC is closed 15/10/18.</p>
Closed?:	Yes

Finding Reference	1512739-201708-N2	Certificate Reference	MSP0 678572
Certificate Standard	MS2530-2:2013	Clause	Part 3: 4.4.5.4
Category	Minor		
Area/Process:	TDM Plantation Sdn Bhd Kemaman Certification Unit		
Details:	The management did not ensure the employees of contractors are paid based on legal on industry minimum standards		
Objective evidence:	There is no evidence that the management has ensure the employees of contractors are paid based on legal on industry minimum standards.		
Cause	During the briefing and before start work, the management already inform to contractor to comply regarding to the employees of contractor's paid based on legal on industry minimum standards. However, no audit to make sure their comply or not with the legal industry minimum standards.		
Correction / containment	For the immediate action, the management will give instruction order to the contractor to comply regarding this matter.		
Corrective action	<p>Also, random audit will be carried out before end this year 2017 and the sampling of payslip from contractor employee will be made annually</p> <p>ASA1 verification: TDM has produce IOM to contractor (KPOM/stakeholder/002/2018) dated Jan 2018. To ensure the compliance KPOM have internal Audit dated 12 June 2018 to randomly check the compliant for Min Wages 2016. Record been verified for ASIADDEC Engineering Mr Mohd Zulfikri Ajjab dated payslip 22 July 2018 all comply with Min Wages 2016.</p>		

	Thus, the minor NC is effectively closed on 15/10/18.
Closed?:	Yes

3.4 Issues Raised by Stakeholders

IS #	Description
1	Issues: Contractors – He informed that the payments were made promptly without any delay. Contract agreement were signed prior commencement of work.
	Management Responses: The management will ensure the payment was made according to the terms.
	Audit Team Findings: No further issue.
2	Issues: Headmaster from SK. Padang Kubu – The management has provided assistance such as provided transportation to send students for competition outside the compound and etc. Good relationship with the management.
	Management Responses: The management will continue to support and provide assistance when deem necessary.
	Audit Team Findings: No other issue.
3	Issues: Head of Village, Kg. Padang Kubu – He informed that no encroachment of land from the management. Good relationship was maintained with the management.
	Management Responses: The management will continue to ensure no encroachment of land into local communities’ land.
	Audit Team Findings: No other issue.
4	Issues: Workers’ Representative (Bangladeshi and Indonesian) – They have been treated equally without any discrimination. Their salary was according to Minimum Wage Order 2016. Free housing was provided to them with subsidized of water and electricity.
	Management Responses: The management will continue to treat all the workers equally and comply with the regulations.
	Audit Team Findings: No further issue.

**MSPO Public Summary Report
Revision 0 (Aug 2017)****3.5 Summary of the Nonconformities and Status**

CAR Ref.	CLASS	ISSUED	STATUS
1512739-201708-M1	Major	17/8/17	Closed on 13/11/17
1512739-201708-M2	Major	17/8/17	Closed on 13/11/17
1512739-201708-M3	Major	17/8/17	Closed on 13/11/17
1512739-201708-M4	Major	17/8/17	Closed on 13/11/17
1512739-201708-M5	Major	17/8/17	Closed on 13/11/17
1512739-201708-M6	Major	17/8/17	Closed on 13/11/17
1512739-201708-M7	Major	17/8/17	Closed on 13/11/17
1512739-201708-N1	Minor	17/8/17	Closed on 15/10/18
1512739-201708-N2	Minor	17/8/17	Closed on 15/10/18

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 -	TDM Plantation has established a policy on sustainable palm oil production signed by CEO, Mr Jailani Che Kar dated 1/8/17.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The established policy has emphasized on the commitment for key legal, social and environmental consideration with the objective of improving the milling and estate operation.	Complied
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 for MSPO was conducted on 7/8/18 at MAIDAM and Pelantoh estate on 10/7/18. The internal audit had covered all the MSPO MS 2530 elements specifically on part 3.	Complied
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	The procedure has incorporated the internal auditor competency requirement. Based on the procedure, internal audit is to be carried	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	implement the necessary corrective action. - Major compliance -	out at least once a year. All finding has been followed up and still in the process on closure.	
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	The internal audit report has distributed to the TDM management. Refer to internal audit report dated 7/8/18 and 10/7/18.	Complied
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 -	The last management review was conducted on 23 rd September 2018. The management review had included internal and external sustainable palm oil audit results review and all pertinent agenda as per standard requirements. The status of the correction and preventive actions are being discuss and reviewed. The meeting was chaired by Mill Manager and attended by HODs.	
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 -	Continuous improvement plan for POM FY2016/2017. It cover the welfare and the operation aspect. For example: Provide additional housing blocks Installing new water filtration system Building a new BioCompost Plant Install CCTV for ensuring the safety of all workers	Complied

Criterion / Indicator		Assessment Findings	Compliance
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 -	The estate has optimised the use of mechanised operations to reduce pollutions. For example, existing crop evacuation system using mechanized buffalo (MB), Mini Tractor Grabber (MTG) and bin system are still in used. Verified during assessment, the was no new information and techniques or new industry standards and technology observed.	Complied
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 -	The action plan is included in the Continuous Improvement Plan for FY 2017/2018.	Complied
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 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. - Major compliance -	TDM Plantation Sdn Bhd has established Flowchart dated 01/06/2016 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders. The estate management will communicate all information requested by relevant stakeholders. All information relating to external stakeholder will be responded by Mill Management depends on the confidentiality. According to the flow chart, the request shall be responded within 2 weeks from the date of receipt.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Requests for information from the Regulatory Department such as DOSH during compliance visit (31/7/2017) to Tebak Estate and Air Putih Estate (19 December 2017) were attended and relevant issue recorded in the inspection book.	
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>There was no restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>Access to these documents is made available upon request. Information relating to land titles, safety and health plans, pollution prevention plans was made available at all operating units. Procedure for complaints and grievances were available at notice boards. The company is in the progress to make available the documents on the company's website in the future.</p> <p>Among the documents that were made available for viewing are:</p> <ul style="list-style-type: none"> • Good Agricultural Practices • Social Enhancement • Sustainability Management Programmes • Complaint and Grievances procedure. • Environmental Conservation <p>These documents highlight current TDM Plantation Sdn Bhd practices and their continual improvement plans. Besides the above document TDM Plantations Sdn Bhd policy on the followings are also available:</p> <ol style="list-style-type: none"> 1) Social 2) Quality 	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		3) Freedom of Association 4) Occupational Safety, Health and Environment 5) Environment & Biodiversity 6) Protection of Children 7) Gender The policies were displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.	
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. - Major compliance -	TDM Plantation Sdn Bhd has established Flowchart for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders.	Complied
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 -	Estate Managers was appointed as officer to handle social issue by Human Resource Department. Letter of appointment dated 18/9/17 for Tebak Estate and 02 September 2014 for Air Putih Estate was sighted.	Complied
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 -	The estates have developed the stakeholder list FY2018 which included all relevant stakeholders such as local communities, government authorities, contractors and suppliers and etc. Stakeholder meeting was conducted on 28/6/2017 for whole Kemaman Complex with stakeholders such as local communities, managers from other estates, workers' representatives, school	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		representatives and etc. Issues raised during the stakeholders was explained in the meeting and unresolved issue has incorporated into the Social Action Plan to monitor.	
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 -	TDM Plantations’ estate only send their FFB to Kemaman POM. Mill’s Supply Chain Procedures TDM/KPOM/01; REV: KPOM-02/2017 describes the procedure for all levels or receiving oil products, processing, storage, transportation and distribution. Daily FFB production report are available up to October 2018. In the report, it recorded the sub-block, hectarage and the total FFB send to palm oil mill. Year to date total of 158,870 mt received at Kemaman POM. The weighbridge ticket will be issued during the delivery of FFB from the estate to mill.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Daily FFB production report are available up to October 2018. In the report, it recorded the sub-block, hectarage and the total FFB send to palm oil mill. The POM will send the summary of the received FFB to the estate on daily basics. Verified the record dated 11/10/18 contain all the required information.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The assistant manager has been assigned to maintain the traceability system. The appointment letter dated 1/08/17 with job responsibility has been clearly defined.	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	Inspection of records confirmed these were updated daily according to the established traceability procedure.	Complied
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 -	Kemaman estate’s complex had continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. The following license and permit available for verification: <u>Maidam Estate</u> i) Diesel permit, ref# TR/DGN/15/09 SKD , permit# T011802, quantity: 8,500 liter valid until 22/10/18 ii) MPOB license: 503576002000, valid until 31/8/19 <u>Pelatoh Estate</u> i) Diesel permit, ref# KPDNKK/KMN/25-14/07 SK D, permit# T010161, quantity: 24,000 liter valid until 9/1/19. ii) MPOB license, 501374002000 valid until 31/3/19	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.3.1.2	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>List of applicable legal and other requirements was made available during the assessment and compiled in the Legal Register 2017. Documented procedure has been established and implemented; refer to SOP: Procedure for Legal and Other Requirements dated November 2012.</p> <p>A summary of legal register FY2017 incorporating all the legal requirements are sighted during onsite at Air Putih, Tebak and Jernih Estate. Latest requirements such as Minimum Wages Order 2016 are registered in the list.</p>	Complied
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>Documented procedure has been established and implemented; refer to SOP: Procedure for Legal and Other Requirements dated November 2012.</p> <p>The estate management will identify all legal and other requirements that are applicable to the estate's operations. The Group Legal Department, Plantation Coordinator and Plantation Advisor will advise of any new regulatory requirements. All the requirements will be evaluated once a year.</p>	Complied
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>Safety Officer is the person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p>	Complied
<p>Criterion 4.3.2 – Lands use rights</p>			

Criterion / Indicator		Assessment Findings	Compliance
4.3.2.1	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>The Estates and Mill are on government lease land and they hold copies of Land Titles. The oil palm operations are consistent with the land title for agricultural purposes.</p> <p><u>Maidam Estate</u> Lease land, 60 years ended 9/12/2058 Agricultural, Mukim Jengai, District: Dungun, HSD 583</p> <p><u>Pelantoh Estate</u> Lease land, 99 years ended 23/6/75 Agricultural, Mukim Jengai, District: Dungun, HSD 583</p>	Complied
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p>- Major compliance -</p>	<p>In Tebak estate, sighted the copy of the land title (no: 18274) onsite and the original keep at the headquarters. In Air Putih Estate, there are total 5 land titles with 4933.26 ha All the land lease belong to state land. There is no issue on land use claims evidence during the audit.</p>	Complied
4.3.2.3	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p>- Major compliance -</p>	<p>The estate boundary is well maintained with the construction of boundary pegs to demarcate the mill's compound.</p> <p>There are more than 10 boundary pegs installed at the boundary of the estate and are evidence in Layout Plan with details GPS Coordinate.</p>	Complied

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 is no issue on legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants in the estate.	Complied
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 land dispute or customary rights issues in the estate.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	There is no land dispute or customary rights issues in the estate.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There is no land dispute or customary rights issues in the estate.	Complied
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.	SIA was conducted on November 2011 by SRA Consultancy. The assessment was covered the whole Kemaman Complex which	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	included Kemaman POM, Pelantoh Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, MAIDAM Estate and Tebak Estate. The assessment team has interviewed with the relevant stakeholders such contractors, local communities, internal workers included local and foreign and etc. The mill and estates have developed SIA Action Plan for Y2018 which covered the social profile such as safety & health, education, housing & infrastructure and etc. The plan was developed through the issues raised during SIA and stakeholder meetings. The plan has incorporated the specific time frame with the person in charge to solve the issue. The SIA plan was updated by each operating units accordingly. The updated SIA plan for each issues raised in the stakeholder meeting was verified.	
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 -	TDM Plantation Sdn Bhd has established a flowchart on handling social issue. Two way communication was the method been utilized by the management. The management has to discuss the issue raised by stakeholders within 2 weeks for the first meeting. According to the procedure, all the complaints and grievances will be recorded in each individual form.	Complied
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 forms can be filling and drop into the suggestion box at the office or send to PIC. The estate management has implemented House Maintenance Records to record any complaints related to housing by the workers. For e.g.: roof was leaking, water pipe broken and etc. The management has taken action to rectify the problem. For example, record complaint for the House door in Gajah Mati Estate dated 6 October 2018 sighted during site visit.	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

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 -	Communication to the affected parties is evidenced. For instance, any social issues are communicated through social and legal PIC, noted appointed person Mohamad Firdaus Bin Abd Sata dated 1 August 2017 and Muhammad Farhan Bin Abdul Fatah dated 1 August 2017 valid for 2 years.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	Grievances procedure flowchart also displayed on the office signboard and security post. Checked the complainants file noted that acknowledgement was evident in the complaint form. Interviewed with the workers' representatives confirmed that the management has addressed the issues raised by them.	Complied
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 -	Grievances procedure flowchart and complaint form displayed on the office signboard.	Complied
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 -	Estates has made contributions to the local communities and stakeholders such as below: a. Request for transportation to Majlis Berbuka Puasa to The Mation Dungun for SK Ladang Gajah mati dated 10 June 2018 (Gajah Mati estate) b. Donation to Asrama Pra tahfiz Perkaya in term of Sugar, Milo, Flour etc. cost around RM 449.13 dated 27 May 2018	Complied

Criterion / Indicator		Assessment Findings	Compliance						
		For Pelantoh Estate:- <ul style="list-style-type: none"> a. Donation to JKKK Padang Kubu RM 370 for ADUN Kijal Activity b. Donation to PIBG for sport activity RM 200 c. Donation to PIBG for helping the school RM 200 d. Donation to JKKK Padang Kubu RM 600 for Futsal Activity. 							
Criterion 4.4.4: Employees safety and health									
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	TDM Plantation has established Occupational, Safety & Health and Environment dated 1/9/17 which signed by CEO, Mr Jailani Che Kar. The OSH plan has developed and in-lined with company's policy and incorporated with the training plan. In Gajah Mati Estate the procedure for safety is available such as HIRARC procedure dated 1 August 2018 edition: TDMP/01 Revision: TDMP – 01/2018. SOP for best practice and also safety is also covered under Standard Operating Procedure for estate dated 23 August 2017(TDMP/OP/07/60.01).	Complied						
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: 	CHRA (REF. No: JKKP HIE 127/171/2(8)- 2017/064) – done by Dr Yasriza bin Yahaya (JKKP HIE 127/171/2(8) valid from 26 10 2016 – 24 Oct 2019, Date assessment 12 December 2017. From Occumed consultancy & services Sdn bhd. CHRA recommendation:- <table border="1" data-bbox="1048 1289 1861 1358"> <thead> <tr> <th>Work unit</th> <th>Recommendation</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Work unit	Recommendation	Frequency				Major non-compliance
Work unit	Recommendation	Frequency							

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings			Compliance
	<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 	Pesticide applicator	Medical surveillance – pemantauan perubatan for Glyphosate isopropalamine	Yearly	
		Fertilizer applicator	No need for any medical surveillance	Not applicable	
	<ul style="list-style-type: none"> 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 and 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 must 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 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. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. 	<p>The latest medical surveillance was carried out on 13 June 2018 by OHD, DOSH Reg: HQ/08/DOC/00/352) Dr Aisam bin Abu Bakar under Klinik Medic Bestari</p> <p>Found Paraquat Dichloride was used at Gajah Mati Estate. Sighted permit issued by Department of Agriculture on 12 September 2018 (TRG/2018/PARA/118(GL))with 200 liter and 18 March 2018 with 600liter (TRG/2018/PARA/036(GL)) for 332.88 ha replanting area. Further trailaed found that no record of paraquat dichlorate being assessed based CHRA assessment dated 12 December 2017. Thus, a major NC was raosed.</p> <p>At Pelantoh Estate, CHRA was carried out on 7 June 2016 by Occumed Consultancy & Service Sdn Bhd (Dr Yasriza bin Yahya) Total of 20 workers (pesticide applicator)was sent for medical surveillance on 6 October 2018 and 13 June 2018 and shows no detrimental of health based on the results.</p> <p>In Gajah Mati Estate training needs and plan is available under file Safety, from the record of training need and plan dated review on</p>			

Criterion / Indicator		Assessment Findings	Compliance
	<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>- Major compliance -</p>	<p>25 Jan 2018 have 16 item including PPE training, First aid training and others.</p> <p>In Pelantoh estate, the OSH committee appointed on 1 April 2018. Sampling record on Muhamad Syawal Bin Endut as management representative LPT/JKKP/2018 and Junaidi Bin Hassan also as management representative LPT/JKKP/2018.</p> <p>Osh Meeting is done periodically 3 month once. Latest record is on 19 September 2018, 20 June 2018 and 16 April 2018. attend by 18 Person for all meeting. Sampling on Minute meeting on June 2018, there are 6 cases accident have been happen from April to June 2018 in Pelantoh Estate and only 1 cases JKKP 6 recorded in Pelantoh estate.</p> <p>Latest HIRARC under HIRARC file already review dated 2 Jan 2018 has include all operation starting from Harvesting, Pruning, Spraying and until sending FFB to mill. Found accident cases JKKP 6 on 25 May 2018 Mohd Azmi with LTI 26 days is not been reviewed in HIRARC in Pelantoh estate. Thus, a major NC was issued.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>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.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has implemented Human Rights Policy dated 1/6/2017. The management is committed to support the principle of Universal Declaration of Human Rights and ILO Core Convention on Labour Standards. They evaluated and managed the human rights activities parallel to the policy such as workers, contractors and suppliers, local communities and etc. The policy</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		was displayed at the notice board in front of office and canteen area.	
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 -	TDM Plantation Sdn Bhd has developed Social Policy dated 1/6/2017 where they are committed to treat all the workers equally during the recruitment and promotion process without discrimination based on nationality, race, ethnic, religion, sexual orientation, age and etc. There were no evidences of any form of discrimination based on race, national origin, religion, gender, union and political affiliation and is covered in the policy as well.	Complied
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 -	The payroll and pay slip records of employees showed that all employees are paid with the monthly salary are compliance with the local minimum wages requirements. Payslip of month April 2018 and June 2018 for workers have been sampled as below: <ul style="list-style-type: none"> a. Alem(GM0901597) b. Forhad Hossain (GM0901749) c. Mohammad Piyas Hossain (GM0901846) d. Zariah Binti Abdullah (GM00034) e. Hayati Binti Jaafar (GM0901156) f. Hawa Bee Binti Mustapa (GM0901687) Review the pay slip of Gajah Mati employees pay statements has been carried out and confirm that their basic salary wages are comply with Minimum Wage Order 2016 of RM 1000/ month or RM 38.46/ day.	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance															
4.4.5.4	<p>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.</p> <p>- Minor compliance -</p>	<p>In Gajah Mati Verification for Harversting Contractor (Kitt Plantation Sdn Bhd), the wages as per record (Payment Voucher)below is align with Min Wages 2016 Reg:-</p> <table border="1"> <thead> <tr> <th>Nama Pekerja</th> <th>Passport</th> <th>Wages</th> </tr> </thead> <tbody> <tr> <td>Ahmad Ridho</td> <td>AT541616</td> <td>1638.28</td> </tr> <tr> <td>Rusdi Rusnan</td> <td>AT305609</td> <td>1674.65</td> </tr> <tr> <td>Muhammad Khaerurrozi</td> <td>AT341168</td> <td>1634.16</td> </tr> <tr> <td>Kamran</td> <td>B2949965</td> <td>1630.00</td> </tr> </tbody> </table>	Nama Pekerja	Passport	Wages	Ahmad Ridho	AT541616	1638.28	Rusdi Rusnan	AT305609	1674.65	Muhammad Khaerurrozi	AT341168	1634.16	Kamran	B2949965	1630.00	Minor Non_Compliance
Nama Pekerja	Passport	Wages																
Ahmad Ridho	AT541616	1638.28																
Rusdi Rusnan	AT305609	1674.65																
Muhammad Khaerurrozi	AT341168	1634.16																
Kamran	B2949965	1630.00																
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 management have a list or record for all workers and record under masterlist workers contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. In Pelantoh estate no subcontractor workers.</p>	Complied															
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>There is a contract and agreement for staff and workers including foreign workers and pay and conditions are documented and are above the industry minimum standard. Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker.</p>	Complied															

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Copies of Employment Contract for each local workers indicated in the employment records are available. Sample of employment contract available for the local workers:</p> <ul style="list-style-type: none"> a. Mohd Azmi Faizul Mazalan (TDMP/BK/100) b. Esah binti Abd Kadir c. Aidil Iman Ahmad Tajudin d. Sakina Binti Samudera 	
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>Estates established a time recording system using Check Roll Book for all employees at different station. The working hours for all employees has been clearly documented in the Check Roll Book as well as their pay slip under OT section to ensure transparent for both employees and employer. Time recording system has been carried out manually on daily basis for field and office staff & executives. For office staff & executives, the working hours are recorded in the Executives & Staff Attendance List. For field workers, they record the working hours in the Daily Time Record. The overtime working hours always approved by the assistant manager. The documented working hours available in the daily check roll records.</p>	Complied
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 and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.</p>	<p>Through the verification of the O/T form, overtime sheet and also the sampled payslip. There is no overtime more than the legal permitting 104 hour</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
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>Pay slips of all employees are available as evidence of salary payment. The pay slip contain the following information :</p> <ul style="list-style-type: none"> a. Opening Balance b. Elaun dobi c. Wages d. Pendahuluan tunai e. EIS f. EPF g. SOCSO h. Bayaran Lebih masa <p>Payslip of month April 2018 and June 2018 for workers have been sampled as below:</p> <ul style="list-style-type: none"> a. Mohd Azmi b. Esah binti Abd Kadir c. Aidil Iman Ahmad Tajudin d. Sakina Binti Samudera 	Complied

Criterion / Indicator		Assessment Findings	Compliance
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 -	The management also provides free housing facilities with water and electricity. In addition, clinic facilities are prepared in the estate and the VMO visit once a month.	Complied
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 -	On-site living quarters are provided to general workers and staff. Observed that the living quarters are habitable and have amenities such as water, electricity etc. Transportation to send children to neighbouring school was provided as well.	Complied
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 -	TDM Plantation Sdn Bhd has developed Gender Policy dated 1/6/2017 where they are responsible to ensure the workplaces are free from any harassment related to sexual, religion, nationality and etc. The policy has been displayed at the notice board in front of office. From the interview with gender committee, Pn Hamidah Bt Abas in Gajah Mati estate they aware regarding to policy and guidelines to prevent all form of sexual harassment. Latest Meeting record is on 28 August 2018 and 16 April 2018, from the meeting record, No issue record under meeting.	Complied
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	TDM Plantation Sdn Bhd has implemented Freedom of Association Policy dated 1/6/2017. The workers were able to join or form any	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	<p>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.</p> <p>- Major compliance -</p>	<p>association according to the Employment Act without any restriction.</p> <p>Besides, they also implemented Social Policy dated 1/6/2017 where they workers are allowed to join and form association freely. Interview of Staff and Workers also confirmed their awareness of freedom of association but there was no worker unions being formed at the moment.</p> <p>In Pelantoh estate, the latest union meeting conducted on 16 May 2018 Various issues being discussed between the union representatives and also management. The Issue already been taken by management available in Social action plan.</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. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn. Bhd. has developed Protection of Children Policy dated 1/6/2017. They are committed not to exploit or recruit any individual less than 16 years old in the plantations. Estate maintain an accurate record of all employees under the list of workers.</p> <p>Through document reviewed on the Employee master listing confirmed that the workers recruited are above 18 years old. Evidence that there is no underage worker (below 18 years old) employed at the work locations visited.</p>	Complied
Criterion 4.4.6: Training and competency			
4.4.6.1	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of</p>	<p>Awareness and training programed had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding SDS, safe working practices and the correct</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>training needs and documentation, including records of training shall be kept.</p> <p>- Major compliance -</p>	<p>use of PPE. PPE standard and compliance based on CHRA recommendation and PPE recommendation in HIRARC and SDS:-</p> <p><u>Gajah Mati Estate</u></p> <ul style="list-style-type: none"> - Policy training: 15 August 2018 - Chemical Handling and Analysis Training: 6 Feb 2018 - Training on Tractor Driving: 21 Oct 2018 - Chemical/Oil Spillage Drill : 14 Feb 2018 - PPE training : 24 march 2018 - Scheduled waste Training:-12 March 2018 <p><u>Pelantoh Estate</u></p> <ul style="list-style-type: none"> - First Aid Training:- 17 Feb 2018 - Buffer zone and HCV Training:- 16 August 2018 - Chemical handling training:- 12 Feb 2018 - HIRARC training <p><u>Maidam Estate</u></p> <ul style="list-style-type: none"> - Policy briefing – 13/8/18 - Incident investigation – 18/7/18 - Emergency evacuation plan briefing – 4/7/18 - Safety Tractor Handling – 21/6/18 	

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		- PPE training – 5/6/18	
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>Training needs and plan is available under file Safety, from the record of training need and plan dated review on 25 Jan 2018 have 16 item including PPE training, First aid training and others.</p> <p>From the sampling :-</p> <p>OSH Awareness have been conduct on date 21 May 2018. This training have been attend by 18 person attend and conduct by Safety officer.</p>	Complied
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>As per record of Continues training is referred in Training needs and plan as per indicator 4.4.6.1 :-</p> <ul style="list-style-type: none"> i) Safety on P&D Application dated 19 April 2018, attended by 16 person. Training by Manager Kadarusman Bin Tumin. ii) Training on safety for motorcycle riding dated on 13 January 2018 iii) Emergency response plan training dated also in January 2018 	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	<p>An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.</p>	<p>TDM Plantations Sdn Bhd has established an environmental policy with relevant to the applicable laws and regulations. Policy was signed by Chief Executive Director on 1st September 2017.</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	The policy has been displayed at the notice board in front of office and line site area. The workers also been briefed on the policy during morning muster. Interviews of staff and workers found that the policy has been communicated and implemented.	
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 established environmental improvement plan/ pollution prevention plan (review on June 2018) has covered all the environmental issue, mitigating measure, action PIC, time frame and status.</p> <p>TDM Plantations Sdn Bhd has established an environmental policy with relevant to the applicable laws and regulations. Policy was signed by Chief Executive Director on 1st June 2017.</p> <p>Environmental Aspect and Impact Identification (EAI) 2017 (date: 1 May 2011; TDM/KPOM/01) has identity the environmental aspects related to its activities, products or services, and to evaluate the significance of the associated environmental impacts. Besides, the applicable law & regulation also incorporated into the evaluation form. For example, replanting activities have been identified in the aspect and impact identification in Tebak and Air Putih estates.</p>	Complied
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 established environmental improvement plan/ pollution prevention plan (review on June 2018) has covered all the environmental issue, mitigating measure, action PIC, time frame and status.</p> <p>Results of the programs that were monitored will determine operational changes whether have positive or negative environmental impacts. For example, in Pelantoh estate</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		management plan updated on 12 Jan 2018. List for environmental improvement plan as such: <ul style="list-style-type: none"> a. River water quality monitoring b. Waste management c. Reduction of pesticide d. Recycling 	
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Estates environmental improvement programme also includes continual improvement plans. For example, the chemical containers triple rinsed and pierced and send to recycler. For EFB, mill will send to Bio-compost plant for composting and send to estate. In Pelantoh Estate, the management plan for 2018 has incorporated various activities including: <ul style="list-style-type: none"> a. Rainwater harvesting b. Reduction of pesticide usage through IPM 	Complied
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 -	Annual training programme of the estates includes environmental awareness and compliance related trainings to the executives, staffs and workers.	Complied
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	Environmental Performance Monitoring Committee (EPMC) established since 1 January 2017 for ensuring the environmental monitoring tools implemented effectively.	Major Non-compliance

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Environmental related matters such as policy, law & regulations, open burning, river pollution and etc were discussed during the meeting. Workers interview reveal that they are encouraged to discuss environmental issues with the management.</p> <p>In addition, quarterly environmental meeting was last conducted on 13/9/18. All pertinent environmental matters were discussed during the meeting. For Maidam Estate, no environmental meeting carried out as todate. Thus a major NC was raised.</p>	
Criterion 4.5.2: Efficiency of energy use and use of renewable energy			
4.5.2.1	<p>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 operations over the base period.</p> <p>- Major compliance -</p>	<p>Monthly record on energy consumption for non-renewable sources were kept and documented. It is monitored to optimise use of non-renewable energy for reference. Data is being compiled for comparison and control for future improvement and reduction plan.</p>	Complied
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>Kemaman Complex Estate’s has estimation on total energy required. This estimation was compared to the actual usage by monthly and reported to the head office for monitoring.</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance						
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	There was no use of renewable energy at Kemaman Estate’s complex as to date. Operation of diesel set and vehicle is fully dependent on fossil fuel.	Complied						
Criterion 4.5.3: Waste management and disposal									
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	<p>Estates has established Waste Management Action Plan FY 2017. Few type of waste has been identified i.e. Scheduled Waste, Domestic Waste and Industrial Waste. The source of these wastes were mainly located at mechanical/electrical workshop, chemical store, scheduled waste store, line site, office, mill effluent pond.</p> <p>Other specific type of waste generated by the mill is organic (biomass) waste which is also a source of renewable energy consists of fibres, shells, empty fruit bunches, boiler ashes and decanter solids.</p> <p>Other specific activities such as mill maintenance and estate vehicle workshop generate few categories of scheduled waste such as SW 305, SW 102 and SW 410.</p>	Complied						
4.5.3.2	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting	<p>Waste Management Action Plan 2018 has identified different type of waste, generated location, action to be taken, person in charge and expected completion.</p> <p>In the action plan FY2018 has identified the waste generated location and action to be taken; for example:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Waste</th> <th style="width: 33%;">Location</th> <th style="width: 33%;">Action to be taken</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Waste	Location	Action to be taken				Complied
Waste	Location	Action to be taken							

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings			Compliance
	<p>them into value-added by-products</p> <p>- Major compliance -</p>	<p>Schedule waste</p>	<p>Mechanical/electrical workshop, chemical store, schedule waste store</p>	<p>Send to licensed contractor</p>	
		<p>Domestic waste</p>	<p>Line site, office, workshop, store, shop</p>	<p>Landfill in estate, recycling campaign</p>	
		<p>Industrial waste</p>	<p>EFB, scrap metal</p>	<p>recycling, mulching</p>	
4.5.3.3	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under 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>TDM Plantations Sdn Bhd has established a procedure for handling of schedule waste (TDMP-02/2017). The SOP stated all the methodology for handling different kind of schedule waste.</p> <p>The estate has a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor.</p> <p>In estate, the empty pesticides container were collected in scheduled waste store after piercing at the bottom of the container. The licensed contractor will collect from the estate. Following record sighted:</p> <p><u>MAIDAM Estate</u></p> <ul style="list-style-type: none"> • Consignment note: 2018062615HZQGMW dated 26/6/18 ; SW305 by Pentas Flora Kelantan • Consignment note: 14596, 14697, SW 409 an SW 410 siaposal date 25/6/18 			<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		<p><u>Pelantoh Estate</u></p> <ul style="list-style-type: none"> • Consignment note: 2018071711Q0M9AE dated 17 July 2018; SW305 by Pentas Flora Kelantan • Consignment note: 2018071711ERJOVZ dated 12 July 2018; SW409 by Pentas Flora Kelantan 	
4.5.3.4	<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 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>During site visit, all estates have a proper Scheduled Waste Store for storing scheduled waste. Empty chemical containers were triple rinse and punctured prior collect by DOE authorized waste disposal contractor.</p> <p>Empty chemical container need to be marked or painted before re-used back for premix.</p>	Complied
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>TDM SOP June 2017; section B8: Guidance for establishing landfill within the estate which required at least 3 km far from the watercourse and residential area.</p> <p>Domestic waste are being disposed at landfill established at the block 98/A in Maidam estate and block 96A F1 in Air Putih Estate.</p>	Complied
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.</p> <p>- Major compliance -</p>	<p>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 area assessed among other as follows;</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings		Compliance
		Sources/objective & target	Action steps	
		Management of HCV river reserve & buffer zone conservation	To train/retrain sprayers/manuring gang to avoid any chemical-related works at the area	
		To monitor waste management plan for its suitability	SW disposal monitoring	
		To improve employees awareness on pollution prevention at housing complex including zero burning policy.	Continuous reminders	
		To minimise spillage of oil/chemical onto the ground	Continuous training and use of spill trays	
		To review aspect identification & impact evaluation to identify significant critical points for control.	Review through EA/EIE	
		Maintenance of sentang trees	Ensure signage & demarcation are visible to avoid chemical intervention. To monitor pollution/erosion	
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 in 4.5.4.1 above		Complied
Criterion 4.5.5: Natural water resources				

Criterion / Indicator	Assessment Findings	Compliance
<p>4.5.5.1 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> <ul style="list-style-type: none"> a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). 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. e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. <p>- Major compliance -</p>	<p>Water management plan 2018 available for review. The plan has included reduction plan, pollution prevention, maintenance and upkeep of field drain for irrigation.</p> <p>Maidam Estate - rainfall data recorded at 4155 mm (todate 2018) compared with 8,065 mm for 2017. Rainfall data will be used as basis for availability of water resource for rain water harvesting programme. Water supply is from government supply, SATU.</p> <p>Water monitoring quality report, by ERALAB (KT) SDN BHD.</p> <p>Refer to COA, 18/07/W0555 dated 24/7/18. Water sampling point, upstream of field drain (W1) and (W2).</p> <p>Comply with limit under NWQSN Class IIA – Water supply II : conventional treatment required, Fishery II – sensitive aquatic species. Class IIB – Recreational use with body contact.</p> <p>Parameter check : pH, BOD5, COD, TSS , AN (NH3 N) Phosphorus (P*), Pesticides in water test (organochlorine pesticides, paraquat)</p> <p><u>Pelantoh Estate</u></p> <p>Total rainfall 2018 to date : 4311 mm. Rainfall data will be used as basis for availability of water resource for rain water harvesting programme. Water supply is from government supply, SATU.</p> <p>SOP for Water Sampling (streams/rivers), issue:1 dated 28/7/12. Frequency of sampling, once a year.</p> <p>Water monitoring quality report, by ERALAB (KT) SDN BHD.</p>	<p>Complied</p>

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Refer to COA, 18/07/W0585 dated 17/7/18. Water sampling point, upstream (W1) N 04° 25' 40.9", E 103° 15' 2.3", downstream of Sg Tebak</p> <p>Comply with limit under NWQSN Class IIA – Water supply II : conventional treatment required, Fishery II – sensitive aquatic species. Class IIB – Recreational use with body contact.</p> <p>Parameter check : pH, BOD5, COD, TSS , AN (NH3 N) Phosphorus (P*), Pesticides in water test (organochlorine pesticides, paraquat). Based on the analysis report, all parameter tested were within stipulate limit and no pesticides detected in water.</p>	
4.5.5.2	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p>- Minor compliance -</p>	<p>There were no construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p>	Complied
4.5.5.3	<p>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).</p> <p>- Minor compliance -</p>	<p>Water management plan includes rain water harvesting programme, desilting of road side drains and etc.</p>	Complied
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value			
4.5.6.1	<p>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:</p>	<p>HCV assessment was conducted in November 2011 by an independent consultant from SRA Consultancy with working experience in conducting HCV and Social Impact Assessment. HCV Toolkit for Malaysia by WWF – Malaysia was used. There were appropriate consultation processes as per the HCV Toolkit-Malaysia</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>b) Conservation status (<i>e.g.</i> 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), that could be significantly affected by the grower(s) activities.</p> <p>- Major compliance -</p>	<p>which covers the three main components of identification, management and monitoring.</p>	
<p>4.5.6.2 If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) 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>Based on the assessment report findings, endangered, rare and threatened species by IUCN was recorded during the surveys. Among the species recorded are elephant (<i>Elephas maximus</i>), Malayan tiger (<i>Panthera tigris corbetti</i>), Malayan tapir (<i>Tapirus indicus</i>) and wild boar. It is due to certain estate bordering with the forest reserve.</p> <p>Besides, respective estate has the animal sighting record which documented types and frequency of the animal being sighted by the workers in the field.</p> <p>No illegal hunting signage are prominently erected at the estate entrance and other strategic area and awareness training has been given to workers and other stakeholders</p> <p>The mitigation measures for the estate such as patrolling, tyre burning and electric fencing.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
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>The HCV management and monitoring plan 2018 was established. Activities such as:</p> <ul style="list-style-type: none"> a. Policy training b. Conservation of natural areas c. Enhance the plantation landscape d. Animal sighting records e. Erect signage <p>In Pelantoh estate, similar HCV Management and Monitoring Plan 2018 sighted during site visit. Record for respective record available.</p>	Complied
Criterion 4.5.7: Zero burning practices			
4.5.7.1	<p>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.</p> <p>- Major compliance -</p>	<p>Replanting programme was completed in 2017 at Maidam Estate. Verified work programme for replanting at Maidam Estate and has confirmed no use of fire for waste disposal and for preparing land for oil palm cultivation or replanting.</p>	Complied
4.5.7.2	<p>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.</p> <p>- Major compliance -</p>	<p>Not applicable for Maidam, Gajah Mati and Pelantoh Estate as there was no phyto-sanitation activities as to date. A normal land preparation practices were observed for replanting.</p>	Not applicable

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
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 -	Not applicable for Maidam, Gajah Mati and Pelantoh Estate as there was no phyto-sanitation activities as to date. A normal land preparation practices were observed for replanting.	Not applicable
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	Not applicable for Maidam, Gajah Mati and Pelantoh Estate as there was no phyto-sanitation activities as to date. A normal land preparation practices were observed for replanting.	Not applicable
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Kemaman Complex Estate's has well established management systems for monitoring and control of best practice implementation at its estate. This includes the programme of regular internal audits by Sustainability Department and agronomist for maintaining and improving the production. In addition, 3rd party Plantation Advisory visit by Sime Darby Seeds and Agricultural Services Sdn Bhd was conducted on 3/10/18. Areas of visit scope (crop recovery, harvesting guidelines, field upkeep and maintenance, frond stacking discipline, manuring matters, pest management, FFB production etc). Other internal check and monitoring done by agronomist department on 23/4/18. Refer to report dated 28/5/18.	Complied
4.6.1.2	Where oil palm is grown within permitted levels on sloping land,		Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator	Assessment Findings	Compliance																								
<p>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 contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.</p> <p>- Major compliance -</p>	<p>Replanted area is established with cover crops and vegetation is well established. Field inspection showed groundcover with soft grass and soft weeds. There is no significant erosion risk was noted during the field visit.</p> <p>Terracing and "Stops bunds" have been constructed to reduce the soil erosion. Summary of soil type and terrain within Maidam Estate:</p> <table border="1" data-bbox="1050 705 1848 1018"> <thead> <tr> <th>Soil type</th> <th>Terrain</th> <th>Area (ha)</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Chempaka Series</td> <td>Flat (0-2°)</td> <td>56</td> <td>7.68</td> </tr> <tr> <td>Kuala Brang Series</td> <td>6-12 °</td> <td>122</td> <td>16.74</td> </tr> <tr> <td>Kuala Brang Series</td> <td>12-20 °</td> <td>394</td> <td>54.05</td> </tr> <tr> <td>Kuala Brang Series</td> <td>20-25 °</td> <td>132</td> <td>18.11</td> </tr> <tr> <td>Tanah Curam</td> <td>Steep >25 °</td> <td>25</td> <td>3.43</td> </tr> </tbody> </table> <p>*Based on soil suitability assessment by Department of Agriculture dated December 2011.</p> <p>There are no peat soils or soil categorised as problematic or fragile soil at visited estates.</p>	Soil type	Terrain	Area (ha)	%	Chempaka Series	Flat (0-2°)	56	7.68	Kuala Brang Series	6-12 °	122	16.74	Kuala Brang Series	12-20 °	394	54.05	Kuala Brang Series	20-25 °	132	18.11	Tanah Curam	Steep >25 °	25	3.43	
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<p>4.6.1.3 A visual identification or reference system shall be established for each field.</p> <p>- Major compliance -</p>	<p>All fields are marked and identified. Information like year planting (field no) and the total hectare is shown in all markers. There are both stencilled at the palm trees and also displayed in signages at the</p>	<p>Complied</p>																								

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		boundary/corners of every fields. This is observed during the field visit at Maidam, Gajah Mati and Pelantoh Estate	
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	TDM plantation has implemented a management system for monitoring and reporting of performance against production targets for achieving long-term economic and financial viability.	Complied
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 -	Long range replanting programme available from 2018 - 2022 i) Maidam Estate – 180 ha (PR19A) ii) Pelantoh Estate – 620.22 (PR91/A1, PR91/A and PR91/D)	Complied
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 d) Price forecast e) e) Financial indicators : cost benefit, discounted cash flow, return on investment	TDM Plantation has an annual operating budget for the calendar year 2018 and 5 year’s projections (2018-2022) for production. The plan includes age profile, yield projection, cost per tonne of FFB production and etc. Besides the OPEX, CAPEX was also gazzeted for improvement. Sample of CAPEX for 2018: i) Bulding and Construction – workers and staff quarters (semi-D), new clinic/dispensary, ii) Road bridges & path – 30’ concrete bridge iii) Plant and machinery – mini tractor grabber	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- 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 -	TDM plantation monitored the estate performance against the targets. It also recommends changes to the plans if necessary.	Complied
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 -	For estates, they always engage the contractor for services such as replanting, cleaning, vehicle maintenance and etc. Pricing for the service has been documented in the contracts for the transportation: <u>Maidam Estate</u> a. Contract for excavator rental; Contract no: PPK/LMA016/18 b. Road grading (LTK Construction and Plantation Works Sdn Bhd); contract: PPK/LMA 017/18 All the terms and conditions were specified in the contract and contractors have acknowledged on each page of the contract.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Sample contract and payment record verification together with interviews of suppliers and contractor found the payments has been made as per contract. Sampled Contractor as below: a. Excavator service (An Cha Enterprise; Invoice: 20326), payment made on 08 Oct 2018	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		b. Road Grading (LTK Construction and Plantation Works Sdn Bhd ; No: LTK-INV1809/004); payment made on 8 Oct 2018All	
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. - Major compliance -	Estates has prepared a standard contract for all the contractors. In the contract, special clause on the MSPO requirements were included to ensure compliance.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Estates has prepared a standard contract for all the contractors. The signed copy of the contract available at the estate office. Sample of contract agreement for harvesting contractor and maintenance work; a. Excavator service (Alias bin Jusoh), contract: TB039/2017. b. FFB Transportation (Sam Chan Foo Contractor & Workshop); contract: TB048/2017 Drain washing; (Koperasi Ladang Kelapa Sawit Kemamn Terengganu Berhad; contract: TB:001/2017	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	Estates has no objection to allow BSI auditors to verify the assessment through physical inspection if required.	Complied
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the	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 TDM HQ.	Complied

Criterion / Indicator	Assessment Findings	Compliance
contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -		
<p>4.7 Principle 7: Development of new planting</p> <p>Kemaman Palm Oil Mill & supply bases did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.</p>		

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 -	TDM Plantation has established a policy on sustainable palm oil production signed by CEO, Mr Jailani Che Kar dated 1/8/17. No changes on the policy as to date.	Complied
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 established policy has emphasized on the commitment for key legal, social and environmental consideration with the objective of improving the milling and estate operation.	Complied
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 for MSPO was conducted on 12 th June 2018 at Kemaman Palm Oil Mill. The internal audit had covered all the MSPO MS2530 elements specifically on part 4.	Complied
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	TDM Plantation Sdn Bhd has established procedure, SOP, TDMP-01/2017, dated 1/7/17 . The procedure is designed for MSPO and used as audit criteria.	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	implement the necessary corrective action. - Major compliance -	The procedure has incorporated the internal auditor competency requirement. Based on the procedure, internal audit is to be carried out at least once a year. 4 major NC were raised during last audit. All finding has been followed and timeline for closure be clearly determined for improvement.	
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	The internal audit report has distributed to the POM management and reported to TDM Plantation Sdn Bhd management. Refer to internal audit report dated 12/6/18.	Complied
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 -	TDM Plantation Sdn Bhd is RSPO certified organization. The last management review was conducted on 23 rd September 2018 combined with Sg Tong complex. The management review has included internal and external sustainable palm oil audit results review. The status of the correction and preventive actions are being discuss and reviewed. The meeting was chaired by CEO and attended by manager from all operating units.	Complied
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	Continuous improvement plan for POM FY2016/2017. It cover the welfare and the operation aspect. For example: Provide additional housing blocks Installing new water filtration system	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Building a new BioCompost Plant</p> <p>Install CCTV for ensuring the safety of all workers</p>	
4.1.4.2	<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>The staff/workers competency training plan for FY 2017/2018 was established. The training identified including operations, understanding of MSPO/RSPO requirements, human rights, company policies, health and safety etc.</p> <p>The FY2017/2018 OPEX budget has include training budget and operations improvement including environmental improvement, worker welfare, OHS etc.</p> <p>Interview with workers confirmed trainings are provided by company on regular basis.</p>	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	<p>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.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has established Flowchart dated 01/06/2016 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders.</p> <p>The mill management will communicate all information requested by relevant stakeholders. All information relating to external stakeholder will be responded by Mill Management depends on the confidentiality. According to the flow chart, the request shall be responded within 2 weeks from the date of receipt. Requests for information from the Regulatory Department such as DOSH</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		visit (3/10/2018) and DOE visit (30/7/18) were attended and relevant issue recorded in the inspection book.	
4.2.1.2	<p>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.</p> <p>- Major compliance -</p>	<p>There was no restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>Access to these documents is made available upon request. Information relating to land titles, safety and health plans, pollution prevention plans was made available at all operating units. Procedure for complaints and grievances were available at notice boards. The company is in the progress to make available the documents on the company's website in the future.</p> <p>Among the documents that were made available for viewing are:</p> <ul style="list-style-type: none"> • Good Agricultural Practices • Social Enhancement • Sustainability Management Programmes • Complaint and Grievances procedure. • Environmental Conservation <p>These documents highlight current TDM Plantation Sdn Bhd practices and their continual improvement plans. Besides the above document TDM Plantations Sdn Bhd policy on the followings are also available:</p> <ol style="list-style-type: none"> 1) Social 2) Quality 3) Freedom of Association 4) Occupational Safety, Health and Environment 5) Environment & Biodiversity 	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		6) Protection of Children 7) Gender The policies were displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.	
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. - Major compliance -	Kemaman POM has established Flowchart for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders.	Complied
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 -	Managers was appointed as officer to handle social issue by Human Resource Department. Letter of appointment dated 1/11/2012 was sighted.	Complied
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 -	Kemaman POM has developed the stakeholder list FY2018 which included all relevant stakeholders such as local communities, government authorities, contractors and suppliers and etc. Stakeholder meeting was conducted on 15/8/2018 for whole Kemaman Complex with stakeholders such as local communities, managers from other estates, workers’ representatives, school representatives and etc. Issues raised during the stakeholders was explained in the meeting and unresolved issue has incorporated into the Social Action Plan to monitor.	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.2.3 – Traceability			
4.2.3.1	<p>The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.</p> <p>- Major compliance -</p>	<p>Kemaman POM only receive FFB from their own supply base; did not receiver from out-grower or any other smallholder.</p> <p>Mill’s Supply Chain Procedures TDM/KPOM/01; REV: KPOM-02/2017 describes the procedure for all levels or receiving oil products, processing, storage, transportation and distribution.</p> <p>Daily production report and sales & stock movement (MT) are available for October 2017 – September 2018. In the report, incoming and outgoing of FFB and palm product (CPO and PK) as well as the despatch record is available.</p> <p>The weighbridge ticket will be issued during the delivery of FFB from the estate to mill as well as delivery of CPO and PK from mill to refinery.</p>	Complied
4.2.3.2	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p>- Major compliance -</p>	<p>Daily production report and sales & stock movement (MT) are available for October 2017 – September 2018. In the report, incoming and outgoing of FFB and palm product (CPO and PK) as well as the despatch record is available. Verified the record dated 11/10/18 contain all the required information.</p>	Complied
4.2.3.3	<p>The management shall identified and assign suitable employees to implement and maintain traceability system.</p> <p>- Minor compliance -</p>	<p>Mill Manager has been appointed as the person in charge of traceability. Refer to appointment letter (ref: P/S09/004/2017) dated 04 Feb 2017.</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.2.3.4	<p>Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.</p> <p>- Major compliance -</p>	<p>Records of storage, sales, delivery or transportation of crude palm oil and palm kernel were maintained at the mill.</p> <p>Example of records evidence are as below:</p> <ul style="list-style-type: none"> a. Daily production Record dated 11 October 2018 (last production date before mill shutdown for inspection) b. Despatch record and sales contract (contract no: PO-181004; SGPK-190801) c. Weighbridge ticket <p><u>Pelantoh Estate</u> Supplier ID: 110-LPN, docket# P0227065 dated 11/10/18, Field : 92B1, vehicle # TAF104 , weight: 9,520 kg</p> <p><u>Gajah Mati Estate</u> Supplier ID: 110-LGM, docket# P0227114 dated 11/10/18, Field 15C4, vehicle # JDY3458, weight : 35,940 kg</p> <p>The mill has generated a monthly CPO/ PK product sales statement on daily basis.</p>	Complied
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>Kemaman POM has maintained the systems for documentation, checking and assessment of legal compliance with applicable laws and regulations. Inspection of records showed that the Kemaman POM has yet to comply with legal and statutory requirements as per the following:</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Sample of Permit and license sighted were :</p> <p>i) Diesel license, serial# T010186, ref# KPDNKK/KMN/25 02/08 SK D, quantity: 42,000 litre valid until 17/4/19</p> <p>ii) MPOB license # 500041904000; validity period 01- April 2018 to 31-Mar-2019 for 384,000 mt</p> <p>iii) Mill DOE license and compliance schedule #004055; validity 1-Jul-2018 to 30-Jun-2019 for 60 MT FFB/hr and method of POME discharge on waterways. Limit for BOD is <100 mg/l.</p> <p>iv) Certificate of fitness checked: Boiler: TG PMD 232 expired 13/8/18 under maintenance and schedule for inspection on 18/10/18 Back pressure receiver: PMT 107391 TG expired on 16/3/19 Steam dryer capacity 15 ton/hr: TG PMT 8213 expired 13/8/18 under maintenance and schedule for inspection on 18/10/18</p> <p>v) Electrical Installation license, Form F, serial# 24847, license# 2017/02779, capacity 2400 kW valid until 21/11/18.</p> <p>vi) Permit to Purchase and Store and Use of Sodium Hydroxide, Poison Ordinance 1952, register# TC0040/2018 and valid until 31/12/18.</p>	
4.3.1.2	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>List of applicable legal and other requirements was made available during the assessment and compiled in the Legal Register 2018. Documented procedure has been established and</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>implemented; refer to SOP: Kemaman Palm Oil Mill: Procedure for Legal and Other Requirements dated November 2012.</p> <p>All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. Refer to legal register for 2018.</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>Evaluation of the legal requirements and compliance status with legal requirement are through internal audits by the compliance and productivity team.</p> <p>At POM, internal audit has been conducted on 12 June 2018 by compliance executive and sustainability team. Assessment report for respective area with all the findings have been documented. Tracking system on any changes in the law been well implemented. E.g. regular notification by Head Office and regular updates from the DOE/DOSH website as well as from government gazette website.</p>	Complied
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>Documented procedure has been established and implemented; refer to SOP: Kemaman Palm Oil Mill: Procedure for Legal and Other Requirements dated November 2012.</p> <p>The mill management will identify all legal and other requirements that are applicable to the Mill operations. The Group Legal Department, Plantation Coordinator and Plantation Advisor will advise of any new regulatory requirements. All the requirements will be evaluated once a year.</p>	Complied
Criterion 4.3.2 – Lands use rights			

Criterion / Indicator		Assessment Findings	Compliance
4.3.2.1	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>The Estates and Mill are on government lease land and they hold copies of Land Titles. The oil palm operations are consistent with the land title for agricultural purposes.</p> <p>For POM, the land title sharing with Pelantoh Estate. Sighted the copy of the land title onsite and the original keep at the headquarters.</p>	Complied
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.</p> <p>- Major compliance -</p>	<p>For POM, the land title (first date alienation: 29 April 1967) sharing with Pelantoh Estate. Sighted the copy of the land title onsite and the original keep at the headquarters.</p> <p>There is no issue on land use claims evidence during the audit.</p>	Complied
4.3.2.3	<p>Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p>- Major compliance -</p>	<p>POM located within the compound of the Pelantoh estate. It was noted that legal boundaries are clearly demarcated and visibly maintained.</p>	Complied
4.3.2.4	<p>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).</p> <p>- Minor compliance -</p>	<p>There is no land dispute in the Kemaman operating units at the time of audit. The land belongs to TDM and land ownership documents verified.</p>	Complied
<p>Criterion 4.3.3 – Customary rights</p>			

Criterion / Indicator		Assessment Findings	Compliance
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 land dispute or customary rights issues in the mill.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	There is no land dispute or customary rights issues in the mill.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	There is no land dispute or customary rights issues in the mill.	Complied
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 -	Social Impact Assessment was conducted on November 2011 by SRA Consultancy. Seen the interview checklists with the relevant stakeholders that been utilized during the assessment. The stakeholders that participated in the assessment were such as school's representative, internal workers and contractors. The topics that discussed during the assessment are child labour issue, discrimination, complaints, policies and etc. The assessment was carried out with the participation of affected stakeholders such as internal workers, contractors, and neighbouring school representatives. Seen the evidence of interview checklists that been utilized during the assessment.	Complied

Criterion / Indicator		Assessment Findings	Compliance
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 -	TDM Plantation Sdn Bhd has established a flowchart on handling social issue. Two way communication was the method been utilized by the management. The management has to discuss the issue raised by stakeholders within 2 weeks for the first meeting. The Complaint procedure is available 'Carta Aliran Pengendalian Isu Sosial (Aduan, Rungutan/ Permohonan)' REV2.0/2017 dated 7 Oct 2018.	Complied
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	From the record of grievance under "Perjumpaan Majikan bersama Wakil Pekerja KPOM" found issue hygiene from bat issue dated meeting 15 May 2018 and the issue is in progress, from the invoice record the company already taken action dated 3 June 2018. Grievances procedure flowchart also displayed on the office signboard and security post. Checked the complainants file noted that acknowledgement was evident in the complaint form. Interviewed with the workers' representatives confirmed that the management has addressed the issues raised by them.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	The complaint form is available in KPOM latest record is available under title house maintenance record and no record complaint from other stakeholder. Grievances procedure flowchart and complaint form displayed on the office signboard.	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.4.2.4	<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>Training (complaint and grievance procedures, communication and consultation procedure) has been conducted too all the Kemaman POM and estates' stakeholder on 28 Jun 2018 for stakeholder (KPOM/Stakeholder/004/2018).</p>	Complied
4.4.2.5	<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>Flowchart indicate records of complaints and resolution for the last 24 months are available in the Complaint and Grievances file. Up to date there is no complaint documented in exception of housing maintenance request.</p>	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	<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>Mill has made contributions to the local communities and stakeholders such as below:</p> <ul style="list-style-type: none"> a. Request for School Sport Day from PIBG SKPK dated 2/5/2018 RM 300. b. Request for Hari Raya Aidilfitri from SKPK dated 28 July 2018 RM 250 c. Donation to BOMBA dated 1 August 2018 d. The record is available under file communication with Stakeholder 	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and</p>	<p>TDM Plantation has established Occupational, Safety & Health and Environment dated 1/9/17 which signed by CEO, Mr Jailani</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>Che Kar. The OSH plan has developed and in-lined with company's policy and incorporated with the training plan.</p>	
<p>4.4.4.2 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 	<p>OSH committee is available in TDM Kemaman POM, Appointment letter dated 10 Dec 2017 valid for 2 year. Example Appointment letter for Mohd Khairul Azri as AJK.</p> <p>OSH Meeting conducted 3 month once, latest meeting dated 25 September 2018, 8 August 2018 and 6 March 2018.</p> <p>Chemical exposure monitoring have been done dated 2 March 2017. From Email dated 3 April 2017, Muhamad Khairul Najib inform mill for non –necessity to conduct further exposure monitoring based on review of chemical exposure monitoring report is less than 10 %PEL.</p> <p>CHRA Dated 10 June 2015 by Muhamad Khairul Najib Bin Ahmad (JKKP HIE 127/171 – 2(259))</p> <p>LEV inspection dated 12/4/2018 by Ir Mohd Zainuddin A Bakar (JKKP HIE 127/171-3/2(76)). Result is acceptable and safe to be used by the laboratory personnel as per report LEV monitoring.</p> <p>HIRARC – Latest review in 8 August 2018. From the JKKP 6 record, accident on Ahmad Hilmi Abdullah dated 1 August 2018 sent to DOSH dated 5 August 2018 with 3 day Lost Time Injury.</p>	<p>Complied</p>

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
	<p>shall 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 that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept and 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>		
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has implemented Human Rights Policy dated 1/6/2017. The management is committed to support the principle of Universal Declaration of Human Rights and ILO Core Convention on Labour Standards. They evaluated and managed the human rights activities parallel to the policy such as workers, contractors and suppliers, local communities and etc. The policy was displayed at the notice board in front of office and canteen area.</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.4.5.2	<p>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.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has developed Social Policy dated 1/6/2017 where they are committed to treat all the workers equally during the recruitment and promotion process without discrimination based on nationality, race, ethnic, religion, sexual orientation, age and etc. There were no evidences of any form of discrimination based on race, national origin, religion, gender, union and political affiliation and is covered in the policy as well.</p>	Complied
4.4.5.3	<p>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.</p> <p>- Major compliance -</p>	<p>The payroll and pay slip records of employees showed that all employees are paid with the monthly salary are compliance with the local minimum wages requirements. Payslip of month January 2018, April 2018 and June 2018 for workers have been sampled as below:</p> <ul style="list-style-type: none"> a. Employee# Azlin b. Employee# Hashim Mohamad c. Employee#Siti zabidah <p>Review the pay slip of mill employees pay statements has been carried out and confirm that their basic salary wages are comply with Minimum Wage Order 2016 of RM 1000/ month or RM 38.46/ day.</p>	Complied
4.4.5.4	<p>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.</p> <p>- Minor compliance -</p>	<p>TDM has produce IOM to contractor (KPOM/stakeholder/002/2018) To ensure the compliance KPOM have internal Audit dated 12 June 2018 to randomly check the compliant for Min Wages 2016. Record for ASIADEC Engineering dated payslip 22 July 2018 all comply with Min Wages 2016.</p>	Minor nonconformance

Criterion / Indicator	Assessment Findings	Compliance
<p>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 full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>Estate maintain an accurate record of all employees under the following documents :</p> <ol style="list-style-type: none"> 1) Workers paid on monthly basics 2) Working paid on daily/hourly workers <p>Both above records (e.g. records updated as of year 2018) verified during the audit were found contains the following details of information for every employees.</p> <ul style="list-style-type: none"> • Employee Name • New IC/Passport • Position • Date of Birth • EPF No • SOCSO No • Tax No • Marital Status • No of children • Nationality • Race • Remuneration • OT Rate and EIS 	<p>Complied</p>

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.5.6 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>There is a contract and agreement for staff and workers, pay and conditions are documented and are above the industry minimum standard and followed as per MAPA NUPW. Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker.</p> <p>Copies of Employment Contract for each local workers indicated in the employment records are available. Sample of employment contract available for the local workers:</p> <ul style="list-style-type: none"> a. Employee# Azlin b. Employee# Hashim Mohamad c. Employee#Siti Zabidah 	<p>Complied</p>
<p>4.4.5.7 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>Mill established a time recording system using Check Roll Book for all employees at different station. The working hours for all employees has been clearly documented in the Check Roll Book as well as their pay slip under OT section to ensure transparent for both employees and employer. Time recording system has been carried out manually on daily basis. The documented working hours available in the daily check roll records</p>	<p>Complied</p>
<p>4.4.5.8 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>Through the verification of the O/T form, overtime sheet and also the sampled payslip. There is no overtime more than the legal permitting 120 hours.</p>	<p>Complied</p>

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
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>Pay slips of all employees are available as evidence of salary payment. The pay slip contain the following information : i. Earnings j. Basic Salary (Daily Rated Work, Work on Rest Day and Work on Holiday) k. Overtime (Week days, Rest days and Holiday) l. Price Bonus m. Advance n. Deduction o. SOCSO, EPF, Others</p>	Complied
4.4.5.10	<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>The management also provides free housing facilities with water and electricity. In addition, clinic facilities are prepared in the estate and the VMO visit once a month.</p>	Complied
4.4.5.11	<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>On-site living quarters are provided to general workers and staff. Observed that the living quarters are habitable and have amenities such as water, electricity etc. New housing is in progress to build for comply with min housing and amenities regulation. Transportation to send children to neighbouring school was provided as well.</p>	Complied
4.4.5.12	<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>TDM Plantation Sdn Bhd has developed Gender Policy dated 1/6/2017 where they are responsible to ensure the workplaces are free from any harassment related to sexual, religion, nationality and etc. The policy has been displayed at the notice board in front of office. Up to date, there is no case reported in the estate. In respective estate will organise gender committee</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		meeting quarterly. For example, meeting conducted on 15/8/2018 and 10/4/2018	
4.4.5.13	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 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 -	TDM Plantation Sdn Bhd has implemented Freedom of Association Policy dated 1/6/2017. The workers were able to join or form any association according to the Employment Act without any restriction. Besides, they also implemented Social Policy dated 1/6/2017 where they workers are allowed to join and form association freely. Interview of Staff and Workers also confirmed their awareness of freedom of association but there was no worker unions being formed at the moment.	Complied
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. - Major compliance -	TDM Plantation Sdn. Bhd. has developed Protection of Children Policy dated 1/6/2017. They are committed not to exploit or recruit any individual less than 16 years old in the plantations. Mill maintain an accurate record of all employees under the list of workers. Through document reviewed on the Employee Listing confirmed that the workers recruited are above 18 years old. Evidence that there is no underage worker (below 18 years old) employed at the work locations visited.	Complied
Criterion 4.4.6: Training and competency			
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.	OSH Programe 2018 was sighted available together which included other related programs for ERP Drill, Electrical Safety, SOP and Emergency evacuation. The following training records were sighted:	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	1) Latest training for workers is on first aid is on 13 March 2018 by Mohd Zaki Abdul Kadir 2) For contractor the latest is training on Safety,SOP and working at height for contractor on 22 July 2018 by Moh Basri Mat Yazid and 8 person attended the training 3) PPE training have been held on 18 Sept 2018 and 75 person is attend the training.	
4.4.6.2	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. - Major compliance -	Training needs for individual employees has been 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.	Complied
4.4.6.3	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. - Minor compliance -	Training Programme established is based on a training need assessment carried out at the individual operating unit level for each work-station/work type. The training program includes staff, workers, contractor’s workers and contractors. It was noted that most of the trainings/briefings are informal “on the job” instruction. The mill maintains records of informal and formal training for workers. Daily briefings are recorded in a note book of the executives, mainly “on the job” instructions.	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			

Criterion / Indicator		Assessment Findings	Compliance
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance -	TDM Plantations Sdn Bhd has established an environmental policy with relevant to the applicable laws and regulations. The policy was signed by Chief Executive Director on 1 st June 2017	Complied
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations - Major compliance -	The established environmental improvement plan/ pollution prevention plan (review on January 2018) has covered all the environmental issue, mitigating measure, action PIC, time frame and status. Environmental Aspect and Impact Identification (EAI) 2017 (date: 1 May 2011; TDM/KPOM/01) has identity the environmental aspects related to its activities, products or services, and to evaluate the significance of the associated environmental impacts. Besides, the applicable law & regulation also incorporated into the evaluation form.	Complied
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance -	The established environmental improvement plan/ pollution prevention plan (review on January 2018) has covered all the environmental issue, mitigating measure, action PIC, time frame and status. Results of the programs that were monitored will determine operational changes whether have positive or negative environmental impacts. List for environmental improvement plan as such: a. River water quality monitoring b. Waste management c. Noise pollution	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		d. CEMS and Stack monitoring	
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Kemaman POM environmental improvement programme also includes continual improvement plans. For example, the POME applied to land through flatbed and long bed application system. For EFB, mill will send to Bio-compost plant for composting and send to estate.	Complied
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. - Major compliance -	Annual training programme of the mill includes environmental awareness and compliance related trainings to the executives, staffs and workers. The latest training conducted on 16 July 2018 for all the workers during every Tuesday morning muster.	Complied
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	Environmental Performance Monitoring Committee (EPMC) established since 1 January 2017 for ensuring the environmental monitoring tools implemented effectively. Environmental related matters such as policy, law & regulations, CEMS, effluent and etc were discussed during the meeting. Workers interview reveal that they are encouraged to discuss environmental issues with the management. In addition, quarterly environmental meeting was last conducted on 20/9/18. All pertinent environmental matters were discussed during the meeting.	Complied
Criterion 4.5.2: Efficiency of energy use and use of renewable energy			

Criterion / Indicator		Assessment Findings	Compliance
4.5.2.1	<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>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement.</p> <p>Apart from use of grid electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler. The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO.</p>	Complied
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>Electricity generation was through steam turbine and boiler where Palm fibre and PK shells were used as renewable energy/fuel on a 70:30 ratio basis. Monthly records of energy consumption of non-renewable and renewable fuel per metric tonne of palm product at the Mill were available.</p> <p>Renewable energy monitoring is based on kWh turbine generated per FFB process. Todate kWh/FFB is 20.75.</p> <p>For diesel usage monitoring todate 2018 recorded at 1.44 litre/FFB.</p>	Complied
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 used in the mill is shown in 4.5.2.2 above.</p> <p>The long term planning for biogas implementation was reviewed. The recovered biogas will be used for energy generation (e.g. steam & electricity and included under Kemaman POM FY2017/2018 CAPEX.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance						
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>Kemaman POM has established Waste Management Action Plan FY 2017. Few type of waste has been identified i.e. Scheduled Waste, Domestic Waste and Industrial Waste. The source of these wastes were mainly located at mechanical/electrical workshop, chemical store, scheduled waste store, line site, office, mill effluent pond.</p> <p>Other specific type of waste generated by the mill is organic (biomass) waste which is also a source of renewable energy consists of fibres, shells, empty fruit bunches, boiler ashes and decanter solids.</p> <p>Other specific activities such as mill maintenance and estate vehicle workshop generate few categories of scheduled waste such as SW 305, SW 102 and SW 410.</p>	Complied						
4.5.3.2	<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>Waste Management Action Plan 2017 has identified different type of waste, generated location, action to be taken, person in charge and expected completion.</p> <p>In the action plan FY2017 has identified the waste generated location and action to be taken; for example:</p> <table border="1" data-bbox="1093 1198 1832 1265"> <thead> <tr> <th>Waste</th> <th>Location</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Waste	Location	Action to be taken				Complied
Waste	Location	Action to be taken							

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings			Compliance
		Schedule waste	Mechanical/electrical workshop, chemical store, schedule waste store	Send to licensed contractor	
		Domestic waste	Line site, office, workshop, store, shop	Landfill in estate, recycling campaign	
		Industrial waste	Mill effluent pond, mill, workshop	BOD monitoring, mulching, recycling	
		<p>For mill effluent, the POME applied to land through flatbed and long bed application system. For EFB, mill will send to estate for mulching purpose.</p>			
4.5.3.3	<p>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 as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p>- Major compliance -</p>	<p>TDM Plantations Sdn Bhd has established a procedure for handling of schedule waste (TDMP-02/2017). The SOP stated all the methodology for handling different kind of schedule waste.</p> <p>The POM and estate has a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor.</p> <p>In Kemaman POM, the empty chemical container were collected and stored at scheduled waste store area. The licensed contractor will collect from the mill. Following record sighted:</p>			Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Consignment note: 2018062108SOWJ4H dated 21 June 2018; SW322 by Urban Environmental Industries Sdn Bhd • Consignment note: 2018062108AK3Q8R dated 21 June 2018; SW409 by Urban Environmental Industries Sdn Bhd • Consignment note: 20180621088LJ65Z dated 21 June 2018; SW305 by Urban Environmental Industries Sdn Bhd 	
4.5.3.4	<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>For domestic waste, Kemaman POM send the domestic waste to the dumpsite at the Pelandoh estate. Inspection to the dump site and the location far from river as well as the residential area.</p> <p>TDM SOP June 2017; section B8: Guidance for establishing landfill within the estate which required at least 3 km far from the watercourse and residential area.</p>	Complied
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	<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>Based on the assessment of all polluting activities as documented under Environmental Aspect and Impact Identification (EAI) for 2018 under boiler house operation, EAI/2018/6-01, and effluent treatment plant, the identified source was from boiler (partilculate and soot) and effluent treatment plant/anaerobic process (GHG).</p> <p>Current monitoring was through online boiler smoke density and alarm and six-monthly boiler and incinerator stack monitoring of dust particulate.</p> <p>2nd half of 2017 : Boiler no.1 (TG PMD 232) – Report ref# L-GB-TC11CTP-0096 dated 6/11/17</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Dust emission load: 0.2336 g/Nm³ , dry @ 12% CO₂ vs 0.4 g/Nm³ , dry @ 12% CO₂</p> <p>1st half of 2018 : Boiler no.2 (TG PMD 232) – Report ref# L-GB-TC1805CTP-0507 dated 31/5/18</p> <p>Dust emission load: 0.005 g/Nm³ , dry @ 12% CO₂ vs 0.4 g/Nm³, dry @ 12% CO₂</p>	
4.5.4.2	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p>- Major compliance -</p>	<p>Kemaman POM pollution prevention plan has been integrated into environmental improvement plan which is being reviewed on yearly basis. Based on pollution prevention plan dated March 2014, main source of significant pollutants and greenhouse gas (GHG) identified was methane (CH₄) emission through POME treatment. The company are in process of obtaining proposals to construct methane capture facilities in POME treatment pond. Other less significant GHG emissions identified including CO_x, SO_x and NO from various sources including fossil fuel, chemical and fertilizer consumptions. GHG emission calculated using and RSPO approved calculator, Palm GHG version 2.</p>	Complied
4.5.4.3	<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>Palm Oil Mill Effluent (POME) treated through anaerobic pond treatment system where the licensed limit for final discharge BOD is 100 mg/l for latest compliance schedule. Regular monitoring was conducted by the mill by taking the sample of waste water in final discharge point before entering the river.</p> <p>Effluent final discharge analysis was monitored on monthly basis by accredited 3rd party laboratory (Makmal Analisa Bukit Goh,</p>	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
		<p>FGV). Refer to the latest analysis dated 27/9/18, ref# 2514/2018. BOD3 recorded <100 mg/l (51 mg/l) and comply with the limit stipulated in mill’s compliance schedule.</p> <p>In addition, Kemaman POM also required to submit Quarterly Return Report to DOE. Latest quarter (April – June 2018) was verified.</p>	
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>Water management plan for 2017 was made available. The plan includes water consumption management (reduction plan) and contingency plan during water shortage. The rainfall data collected to monitor the availability of water. Water consumption were monitored and measured individually for mill processing, boiler, firefighting and housing. Average consumption to date for 2018 = 2.35 m³/FFB processed.</p> <p>Plan to reduce usage was observed at Kemaman POM as per below:</p> <ul style="list-style-type: none"> i) Process water recycling – turbine cooling water, vacuum dryer recycled water ii) Dilution water consumption – sterilizer condensate recycle 	Complied
4.5.5.2	<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>Palm Oil Mill Effluent (POME) treated through anaerobic pond treatment system where the licensed limit for final discharge BOD allowed by DOE was 100mg/l through discharge to river course.</p> <p>Parameter monitored:- pH, Total Alkalinity, VFA, BOD, COD, TS, SS, VSS, TN, AN, O&G. Effluent Analysis conducted by Felda</p>	Complied

**MSPO Public Summary Report
Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings	Compliance
		<p>Industries Sdn Bhd and submitted to DOE every 3 months through OER (Online Environmental Report). Following report sighted:</p> <ul style="list-style-type: none"> a. Report dated 29 September 2018 - BOD: 51 mg/L b. Report dated 10 August 2018 - BOD: 65 mg/L c. Report dated 19 April 2017- BOD: 40 mg/L <p>BOD limit for final discharge <100mg/L were met as well as all parameters that were within allowable limit.</p>	
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Mill Management			
4.6.1.1	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p>	<p>For Kemaman POM, the Standard Operating Procedure & Operation Manual updated on November 2012. (TDM/KPOM/01 dated 1 May 2011) as a guidance document to operate the mill. There are total 25 SOP has been documented.</p> <p>For estate, the SOP which revised on May 2017 has 2 section:</p> <ul style="list-style-type: none"> a. Section A- Total 19 SOP which cover all the operations such as boundary, muster, nursery, soil conservation and etc. b. Section B- Total 9 SOP which cover mainly on workshop, clinic, childcare centre, generator set, foreign workers, land dispute and waste. 	Complied

MSPO Public Summary Report
Revision 0 (Aug 2017)

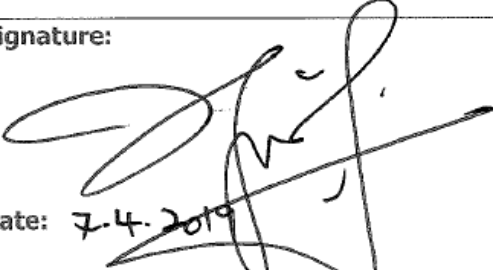

Criterion / Indicator		Assessment Findings	Compliance
		<p>Work Instructions in Bahasa Malaysia have been derived from SOPs and are posted at work stations at the mill and at certain locations at the estates, such as the Muster Notice Boards.</p> <p>External Mill Advisor inspect and report on the operations on annual basis. There were other audits by compliance & productivity team to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirement.</p>	
4.6.1.2	<p>All palm oil mills shall implement best practices.</p> <p>- Major compliance -</p>	<p>Sustainability department inspect and report on the operations on annual basis. The on-site managers develop the action plans from the MA visit report and internal audit report for improvement of the operations. Review of reports, action plans and site inspections confirmed consistent records of implementation of SOPs. This to ensure that performance is on track and best practices being consistently implemented.</p>	Complied
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>Kemaman POM had an annual budget for the financial year 2017. The palm oil mill budget includes the projected FFB processed, CPO and PK production which projected for five years from 2018 until 2022. It also incorporated item such as general charges, mill maintenance, process shift labour, general services, processing cost and fixed assets.</p>	Complied
Criterion 4.6.3: Transparent and fair price dealing			

MSPO Public Summary Report
Revision 0 (Aug 2017)

Criterion / Indicator		Assessment Findings	Compliance
4.6.3.1	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p>- Major compliance -</p>	<p>Kemaman palm oil mill process FFB from company owned estates only. No FFB purchased from out-growers or smallholders.</p> <p>Pricing for the service has been documented in the contracts for the transportation:</p> <ul style="list-style-type: none"> i. Contract for CPO and PK transporter: NPT Travel and Tours Sdn Bhd; signed on 17/1/18 ii. Contract for CPO and PK transporter: Hamidah Bt. Senik; signed on 17/1/18 iii. EFB disposal and evacuation: Chong Trading; signed 17/1/18 <p>For the sales of CPO, following contracts were verified:</p> <ul style="list-style-type: none"> a. TDM/SGCPO-0817/P8548 b. WPCPO986732 c. PGO/01P1707/0015L d. All the terms and conditions were specified in the contract and contractors have acknowledged on each page of the contract. 	Complied
4.6.3.2	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p>	<p>Sample contract and payment record verification together with interviews of suppliers and contractor found the payments has been made as per contract. Based on the terms in the contract clause 3a, the payment terms will be made within 14 days after the invoice made. Following invoice and payments verified:</p> <ul style="list-style-type: none"> a) No Contract: P/C05/166/2018 dated 17 June 2018; Invoice no: 0313 dated 31 Jul 2018 <p>Seen the purchase summary and invoice confirmed that the payment was made promptly and according to the signed</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		contract agreement. Interviewed with the contractor confirmed that the payment was made accordingly.	
Criterion 4.6.4: Contractor			
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	Kemaman POM has prepared a standard contract for all the contractors. In the contract, special clause on the MSPO requirements were included to ensure compliance.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Kemaman POM has prepared a standard contract for all the contractors. The signed copy of the contract available at the mill. Verified sample of contract with both party agreement for; i. Contract for CPO transporter: Koperasi Ladang Kemaman Trg Berhad; CLF Jaya Enterprise; Nik Transport Enterprise; signed on 15 Jan 2016 Palm Kernel transporter: Koperasi Ladang Kemaman Trg Berhad; Hamidah Binti Senik; signed on 15 Jan 2017	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	Kemaman POM has no objection to allow BSI auditors to verify the assessment through physical inspection if required.	Complied

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment TDM Plantation (Kemaman POM and estates) comply with the MS 2530-3:2013 and MS2530-4:2013. It is recommended that the certification of Kemaman POM and estates is to be continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: HAJI SHAHBUDIN BIN USOP	Name: Mohamed Hidhir Zainal Abidin
Company name: TDM PLANTATION SDN. BHD. (KEMAMAN)	Company name: BSI Services Malaysia Sdn Bhd
Title: MILL MANAGER	Title: Lead Auditor
Signature: 	Signature: 
Date: 7-4-2019	Date: 5/4/2019

Appendix A: Assessment Plan

PRELIMINARY AGENDA				
Date	Time	Subjects	Hidhir	Naquiuddin
Sunday 14/10/2018	AM	Audit team travelling Kuantan. Check in at Zenith Hotel, Kuantan	√	√
Monday 15/10/2018 Kemaman Palm Oil Mill	0730	Audit team travelling to site		
	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan 	√	√
	09.00 – 12.30	Kemaman Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√
	10.00-12.30	Stakeholder interviews (combined with estate's Stakeholders)	-	√
	12.30 – 13.30	Lunch	√	√

MSPO Public Summary Report
Revision 0 (Aug 2017)

PRELIMINARY AGENDA				
Date	Time	Subjects	Hidhir	Naquiuddin
	13.30 – 16.30	Continue with unfinished elements Document Review (part 4), P1: Management commitment and responsibility, P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition P5: Environment, natural resources, biodiversity and ecosystem services P4: Social responsibility, health safety and employment condition, P6 : Best practices	√ √	√ √
	16.30 - 17.00	Interim Closing briefing	√	√
Tuesday 16/10/2018 MAIDAM estate	09.00 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Document review P1 – P6 (part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement	√ √	- -
	12.30 – 13.30	Lunch	√	-
	13.30 – 16.30	P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6 : Best practices, P7: Development of New Planting	√	-
	16.30 - 17.00	Interim Closing briefing	√	-
Tuesday 16/10/2018 Gajah Mati Estate	09.00 – 10.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Document review P1 – P6 (part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement	- -	√ √
	12.30 – 13.30	Lunch	-	√
	13.30 – 16.30	P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6 : Best practices, P7: Development of New Planting	-	√
	16.30 - 17.00	Interim Closing briefing.	-	√

MSP0 Public Summary Report
Revision 0 (Aug 2017)

Wednesday 17/10/18 Pelantoh Estate	09.00 – 10.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√
	12.30 – 13.30	Lunch	√	√
	13.30 – 16.00	P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6 : Best practices, P7: Development of New Planting	√	√
	16.00 - 17.00	Audit team discussion and closing meeting	√	√
Thursday 18/10/18	AM	Travelling back to KL	√	√

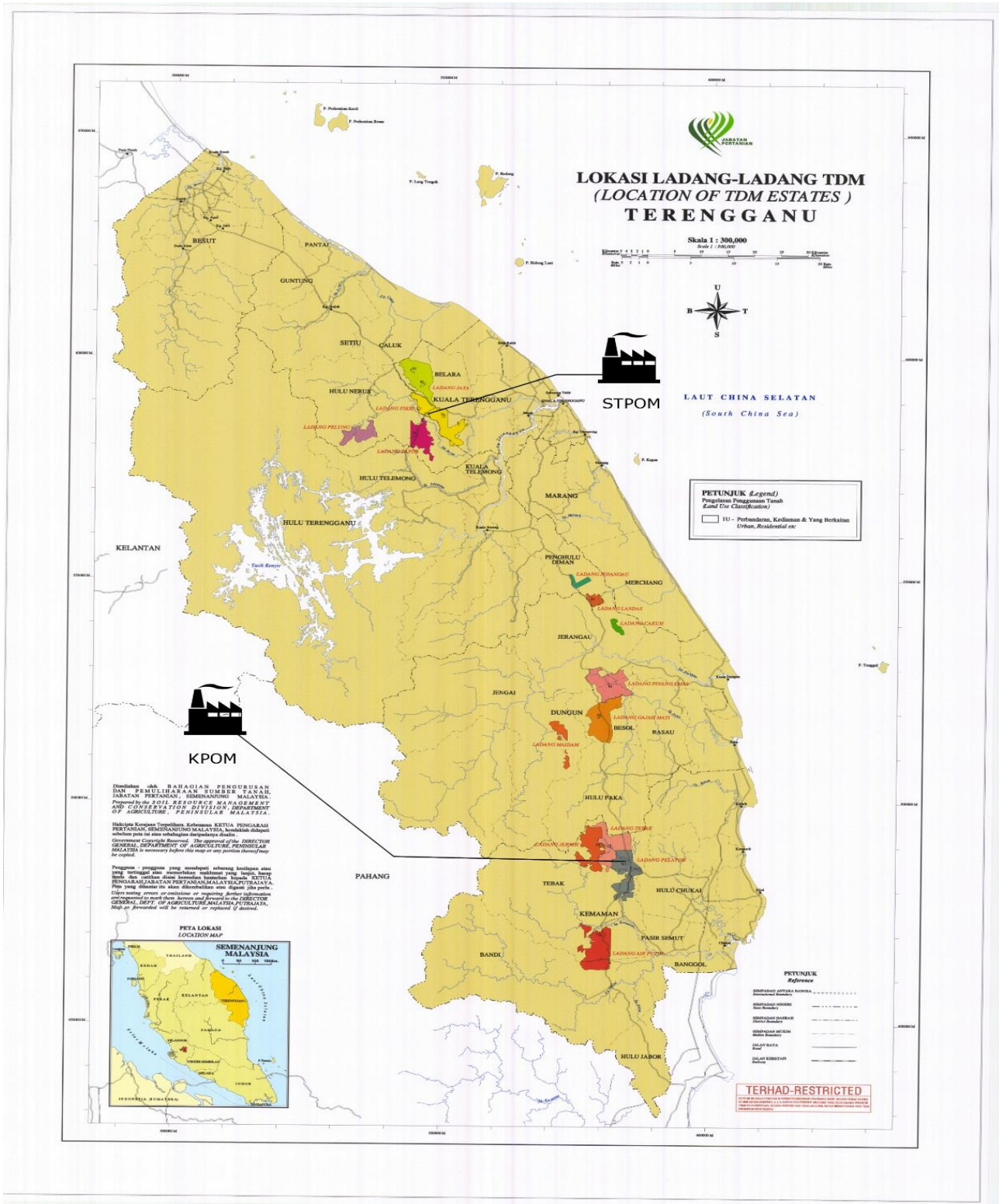
Appendix B: List of Stakeholders Contacted

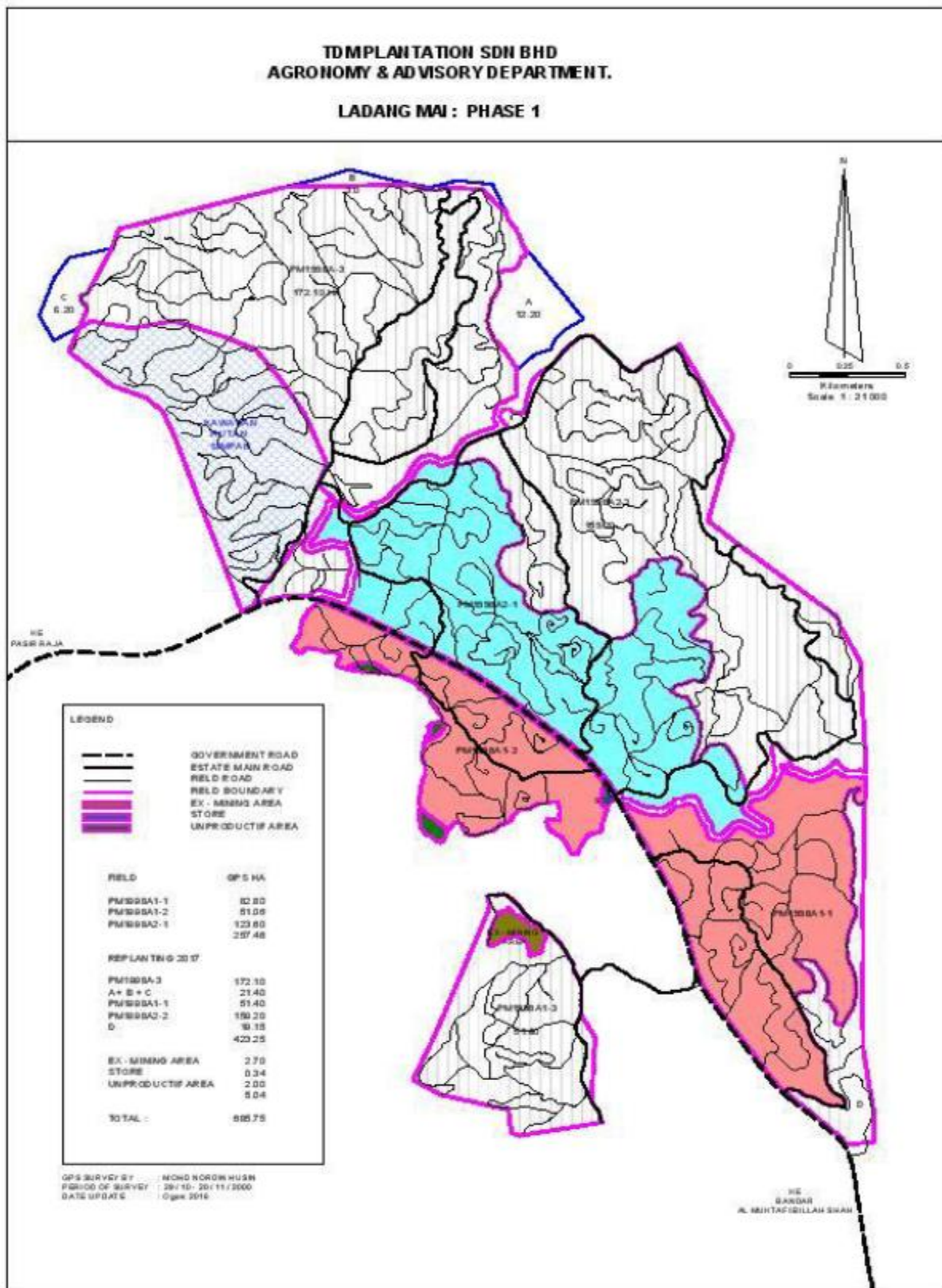
Internal Stakeholders	External Stakeholders
Kemaman POM Management team and Staff	General Contractor
On site compliance executives	FFB Supplier
Mill Manager and Assistants	FFB Transport contractor
Estate Managers and Assistants	Local vilagers
Facility Administrators	School Teacher/Headmaster
Gender Committee Representatives	
Male and Female workers	
Workers Representatives	
Foreign Workers Representatives	

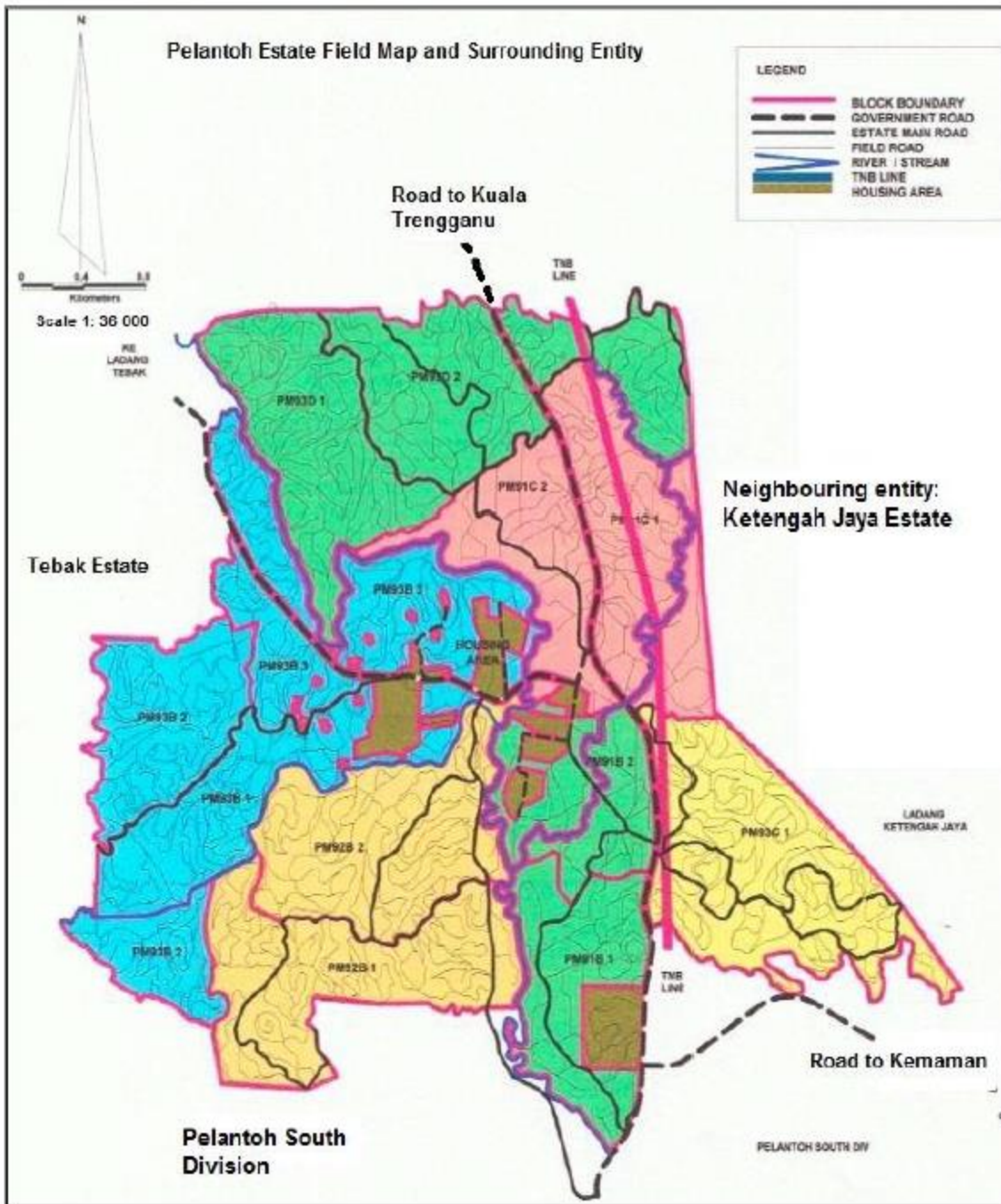
Appendix C: Smallholder Member Details

No	Name of smallholder	Year Planted	Land Area (ha)	Forecast FFB (Mt/ha/year)
1	Not applicable			
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
TOTAL				

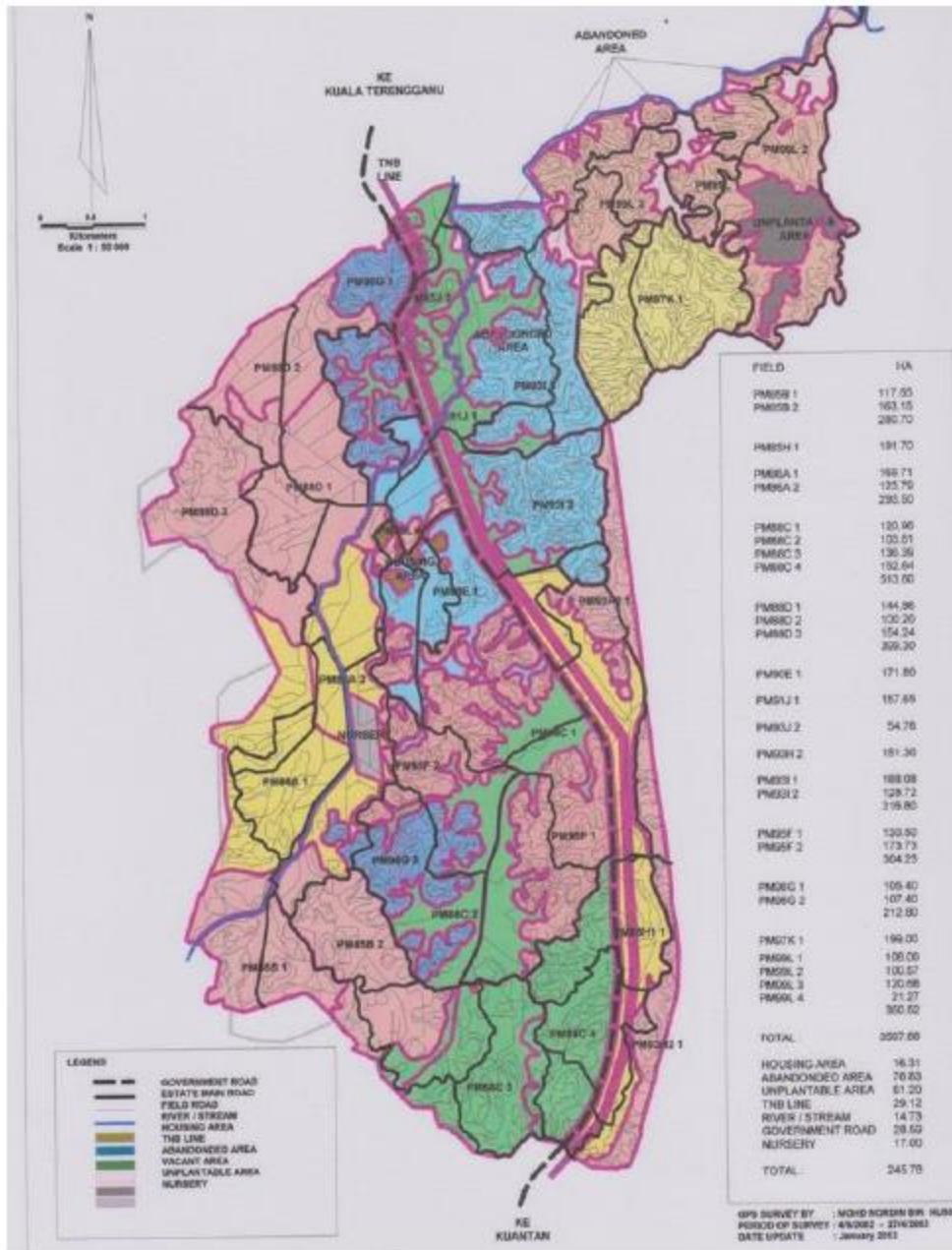
Appendix D: Location and Field Map (Pelantoh, Gajah Mati and MAIDAM)







MSP0 Public Summary Report
Revision 0 (Aug 2017)



Appendix E: List of Abbreviations Used

AN	Ammoniacal Nitrogen
ANPN	National Park Agency Gabon
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
DGEPN	Environmental Protection Agency Gabon
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
MSP0	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