

**MALAYSIAN SUSTAINABLE PALM OIL
– ANNUAL SURVEILLANCE ASSESSMENT 2
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: Tebak Estate, Pelantoh Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate and MAIDAM Estate Location of Certification Unit: KM 121, Jerangau - Jabor Highway, 24101 Kemaman, Terengganu, Malaysia

Report prepared by:
Hafriazhar Mohd Mokhtar (Lead Auditor)

Report Number:

Assessment Conducted by:
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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Mill/Estate	MPOB License Number	Expiry date	
Kemaman Palm Oil Mill	500041904000	31/03/2020	
Tebak Estate	501373102000	31/03/2020	
Pelantoh Estate	501374002000	31/03/2020	
Jernih Estate	501868102000	31/10/2020	
Air Putih Estate	503558102000	31/07/2020	
Gajah Mati Estate	502036302000	31/08/2020	
MAIDAM Estate	503576002000	31/08/2020	
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: Kilang Kelapa Sawit Kemaman, KM 121, Jerangau – Jabor Highway, 24101 Kemaman, Terengganu, Malaysia		
Group name if applicable:	N/A		
Subsidiary of (if applicable)	N/A		
Contact Person Name	Mohd. Izwan Haffez bin Che Azmi		
Website	www.tdmberhad.com.my	E-mail	izwan.tdmp@tdmberhad.com.my
Telephone	09-6204 800/ 019-9515 898	Facsimile	09-6204 803

1.2 Certification Information			
Certificate Number	Mill: MSPO 678572 Plantations: MSPO 686877		
Issue Date	15/12/2017	Expiry date	14/12/2022
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Stage 1 Date	N/A (The certification unit is RSPO certified)		
Stage 2 / Initial Assessment Visit Date (IAV)	15-17 August 2017		
Continuous Assessment Visit Date (CAV) 1	15-17 October 2018		
Continuous Assessment Visit Date (CAV) 2	3-6 September 2019		
Continuous Assessment Visit Date (CAV) 3	N/A		
Continuous Assessment Visit Date (CAV) 4	N/A		

Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 587626	RSPO	BSI Services (M) Sdn Bhd	31/10/2023

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' 52.80" E	4° 24' 10.80" N
Tebak Estate	KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	103° 13' 35.40" 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	Lot 140-141, Mukim Bukit Besi, 23200 Dungun, Terengganu, Malaysia	103° 12' 23.30" E	4° 41' 45.05" N
MAIDAM Estate	AM9, Bandar AMBS, 23400 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	297.29	1,684.45	358.81
Pelantoh Estate	1,347.02	-	-	-	1,817.43
Jernih Estate	688.15	82.20	1,517.17	463.70	-
Air Putih Estate	-	2,435.24	82.49	1,524.97	-
Gajah Mati Estate	1,087.91	1,524.31	106.78	701.53	-
MAIDAM Estate	435.80	-	-	376.26	-
Total	4,123.27	4,129.14	2,003.73	4,750.91	2,176.24

1.5 Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (Oct 2018– Sep 2019)	Actual (Oct 2018– Sep 2019)	Forecast (Oct 2019– Sep 2020)
Tebak Estate	46,873.72	41,919.75	69,795.00
Pelantoh Estate	49,538.90	43,834.82	25,700.00
Jernih Estate	49,891.80	44,404.57	85,900.00
Air Putih Estate	31,424.55	54,906.20	61,300.00
Gajah Mati Estate	32,681.80	32,958.88	24,970.00
MAIDAM Estate	5,203.81	3,718.72	7,280.00
Total	215,614.58	221,742.94	274,945.00

1.6 Certified CPO / PK Tonnage			
Kemaman POM 60 MT/hr	Estimated (Oct 2018– Sep 2019)	Actual (Oct 2018– Sep 2019)	Forecast (Oct 2019– Sep 2020)
	CPO (OER: 21.03%)	CPO (OER: 20.36%)	CPO (OER: 20.50%)
	45,346.37	45,146.86	56,363.73
	PK (KER: 5.40%)	PK (KER: 4.79%)	PK (KER: 5.00%)
	11,633.15	10,621.49	13,747.25

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	90.00
Air Putih Estate	4,042.70	187.70	121.58	4,351.98	92.89
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	82.70
Total	17,217.20	443.74	1,208.73	18,869.67	91.24

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 and Dungun, 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 3-6 September 2019.

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
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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 3-6 September 2019. The audit programme is included as Appendix A. The approach to the audit was to treat the mill or plantations as a MSP0 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 $S = r\sqrt{n}$ where n is the number of estates while when applicable, the smallholders sample were determined following the MSP0 Certification Requirement. The sampling of smallholders were based on the formula $(r\sqrt{n})$; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix C.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the MSP0 requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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

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

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

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

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

1. Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Kemaman Palm Oil Mill	✓	✓	✓	✓	✓
Tebak Estate	✓	-	✓	-	✓
Pelantoh Estate	-	✓	-	✓	-
Jernih Estate	✓	-	✓	-	✓
Air Putih Estate	✓	-	✓	-	✓
Gajah Mati Estate	-	✓	-	✓	-
MAIDAM Estate	-	✓	-	✓	-

Tentative Date of Next Visit: September 7, 2020 - September 11, 2020

Total No. of Mandays: 8 mandays

BSI Assessment Team:

Hafriazhar Mohd Mokhtar – Lead Auditor

He is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 1000 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia, Thailand, Brunei and Hong Kong. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands, Gabon, Nigeria and Pakistan. During assessment, he covered the mill and estate best practices, legal issues, social issues, workers consultation, stakeholder consultation, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.

Mahzan Munap – Team Member

He holds a MBA from Ohio University and B Sc. in Petroleum Engineering from University of Missouri, USA. Collected over 370 days of auditing experience in OHSAS 18001 and MS 1722 OHSMS (72 days for palm oil milling and 8 days for oil palm plantation). CIMAH competent person with Malaysia Department of Occupational Safety and Health (DOSH) since 1997. An Occupational Safety and Health Trainer at INSTEP PETRONAS. Successfully completed RSPO Lead Assessor Course in 2008 and IRCA accredited Lead Assessor training for ISO 9001 and RABQSA/IRCA EMS Lead Assessor Course for ISO 14001 in 2008. During this assessment, he covered Mill & Estate Best Practices, Legal, OSH, Workers Consultation & etc.

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 2 (ASA 2) there were 4 Major NCs, 1 Minor NC and 4 OFIs 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
1820365-201908-M1	TDM Plantation Sdn. Bhd. Kemaman Palm Oil Mill & Supply Base MS 2530:2013-Part 4	4.4.4.2
Requirements:	(b) The risk of all operations shall be assessed and documented.	
Statement of Nonconformity:	The above requirement was not adequately addressed.	
Objective Evidence:	Kemaman Palm Oil Mill: The mill HIRARC Register last reviewed February 2019 had not included identification of hazards and assessment of risk at Bio Compost Plant	
Corrections:	HIRARC for new item and updated machine will be established and implemented accordingly	
Root cause analysis:	HIRARC was already reviewed and implemented. However, HIRARC for new item or any updated machine related to operation was not fully covered	
Corrective Actions:	HIRARC will be reviewed annually related to any updated of operation in Compost Plant	

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Assessment Conclusion:	CAP has been accepted and evidence of CAP submitted confirmed that the CAP taken was efficient to address the NC. Hence, Major NC was closed on 5/11/2019
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Major Nonconformities:		
Ref	Area/Process	Clause
1820365-201908-M2	TDM Plantation Sdn. Bhd. Kemaman Palm Oil Mill & Supply Base MS 2530:2013-Part 4	4.5.1.2
Requirements:	The environmental management plan shall cover: b) The aspects and impacts analysis of all operations.	
Statement of Nonconformity:	The above requirement was not adequately addressed.	
Objective Evidence:	Kemaman Palm Oil Mill: The mill Environmental Aspect Impact Register last reviewed 3.2.2019 had not included environmental risk at Lubricant Store and old shaping machine.	
Corrections:	<ul style="list-style-type: none"> - The Environmental Aspect Impact related to this matter will be updated and captured in the continuous improvement plan and pollution prevention plan - To clean and to maintain housekeeping checklist 	
Root cause analysis:	During the visit to the lubricant store, found that oil contaminated at old shaping machine is not well maintained	
Corrective Actions:	<ul style="list-style-type: none"> - To provide refresher training on schedule was disposal system - To provide maintenance schedule for related machine 	
Assessment Conclusion:	CAP has been accepted and evidence of CAP submitted confirmed that the CAP taken was efficient to address the NC. Hence, Major NC was closed on 5/11/2019	

Major Nonconformities:		
Ref	Area/Process	Clause
1820365-201908-M3	TDM Plantation Sdn. Bhd. Kemaman Palm Oil Mill & Supply Base MS 2530:2013-Part 3	4.4.4.2
Requirements:	(b) The risk of all operations shall be assessed and documented.	
Statement of Nonconformity:	The above requirement was not adequately addressed.	
Objective Evidence:	Air Putih & Jernih Estate: The estates HIRARC Register 2019 had not included identification of hazards and assessment of risk at Lubricant store (Jernih and Air Putih Estate), Diesel Storage tank (Jernih Estate)	

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Corrections:	<ul style="list-style-type: none"> - Updated HIRARC to handling 200 liters drum of lubricant oil - Updated HIRARC and safety requirement design by install the climbing ladder for opening the tank hatch door purpose - Estate immediately to use 3mt Shop Crane to load drum onto drum stage/bay. That activity done by estate with proper PPE such as safety boot and leather glove
Root cause analysis:	To load lubricant drum to Drum Stage/Bay, that activity was handle by pushing drum onto stage with conventional method
Corrective Actions:	<ul style="list-style-type: none"> - Switch 200 liters to 18 liters lubricant oil container for estate vehicle use - Install a safety climbing ladder for opening the tank hatch door purposes
Assessment Conclusion:	CAP has been accepted and evidence of CAP submitted confirmed that the CAP taken was efficient to address the NC. Hence, Major NC was closed on 5/11/2019

Major Nonconformities:		
Ref	Area/Process	Clause
1820365-201908-M4	TDM Plantation Sdn. Bhd. Kemaman Palm Oil Mill & Supply Base MS 2530:2013-Part 3	4.5.1.2
Requirements:	The environmental management plan shall cover (b) The aspects and impacts analysis of all operations.	
Statement of Nonconformity:	The above requirement was not adequately addressed.	
Objective Evidence:	Air Putih, Jernih & Tebak Estate: The Environmental Aspect Impact Register last reviewed 18.3.2019 had not included environmental risk Scheduled Waste 102 Storage battery disposal.	
Corrections:	Apply permit SW102 from DOE	
Root cause analysis:	Usually, used battery was trade-in with new battery from supplier	
Corrective Actions:	To request permit letter from DOE to give approval to Pentas Flora to dispose SW102. This take 3 weeks for approval letter requested for permit	
Assessment Conclusion:	CAP has been accepted and evidence of CAP submitted confirmed that the CAP taken was efficient to address the NC. Hence, Major NC was closed on 5/11/2019	

Minor Nonconformities:		
Ref	Area/Process	Clause
1820365-201908-N1	TDM Plantation Sdn. Bhd. Kemaman Palm Oil Mill & Supply Base MS 2530:2013-Part 3	4.5.3.5

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Requirements:	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.
Statement of Nonconformity:	The above requirement was not adequately addressed.
Objective Evidence:	Air Putih, Jernih & Tebak Estate: LAP has not fenced up the 3rd landfill plot, no safety warning signage erected and no records of disposal. LJN has no records of disposal displayed at landfill. TBK frequency of collection from line-site to be improved.
Corrections:	<ul style="list-style-type: none"> - Landfill plot fencing was damaged due to encroachment by cattle - The schedule disposal record was not displayed at the landfill - No proper schedule of rubbish collection at linesite
Root cause analysis:	<ul style="list-style-type: none"> - Landfill plot fencing was damaged due to encroachment by cattle - The schedule disposal record was not displayed at the landfill - No proper schedule of rubbish collection at linesite
Corrective Actions:	To request permit letter from DOE to give approval to Pentas Flora to dispose SW102. This take 3 weeks for approval letter requested for permit
Assessment Conclusion:	CAP has been accepted. Evidence of CAP effectiveness to be verified in next coming audit.

Opportunities for Improvements

1	Part 3 - 4.4.6.2: Trainings were given by the employer such as scheduled waste training, first aid training, and chemical handling however conditions observed during the site verification and response received from workers interviews were not fully reflective of actual trainings given
2	Part 4 - 4.4.6.2: Trainings were given by the employer such as scheduled waste training, first aid training, and chemical handling however conditions observed during the site verification and response received from workers interviews were not fully reflective of actual trainings given
3	Part 3 - 4.4.5.11: Non-authorized additional construction and extension or renovation of company's house shall be observed
4	Part 4 - 4.4.5.11: Non-authorized additional construction and extension or renovation of company's house shall be observed

Noteworthy Positive Comments

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

3.3 Status of Nonconformities Previously Identified and OFI

Finding Reference	1697065-201810-M1	Certificate Reference	MSPO 678572
Certificate Standard	MS2530-3:2013 & MS2530-4:2013	Clause	Part 3: 4.4.4.2
Category	Major		
Area/Process:	TDM Plantation Sdn Bhd Kemaman Certification Unit		
Details:	The risk of operation and accident was not periodically reviewed effectively.		
Objective evidence:	<ul style="list-style-type: none"> 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 600liter (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 JKKP 6 on 25 May 2018 Mohd Azmi with LTI 26 days. HIRARC was not reviewed after occurrence of the said accident 		
Cause	<ul style="list-style-type: none"> 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 		
Correction / containment	<ul style="list-style-type: none"> i) Appointment of CHRA assessor for the re-assessment of Paraquat Dichlorate ii) To review and updated HIRARC 		
Corrective action	<ul style="list-style-type: none"> i) Appointment of CHRA assessor from Occumed Consultancy Sdn Bhd for the reassessment of Paraquat Dichlorate. Report will be updated and reviewed periodically. ii) To review HIRARC on security under patrolling section and checked during internal audit. 		
ASA 2 status	Issue has been previously resolved. However, due to other findings raised fall under same indicator, a new Major NC has been raised.		

Finding Reference	1697065-201810-M2	Certificate Reference	MSPO 678572
Certificate Standard	MS2530-3:2013 & MS2530-4:2013	Clause	Part 3: 4.5.1.6
Category	Major		
Area/Process:	TDM Plantation Sdn Bhd Kemaman Certification Unit		
Details:	Regular meetings on environmental quality was regularly organized.		
Objective evidence:	No environmental meeting @ EPMC meeting carried out in 2018 at MAIDAM estate		

Cause	Environmental meeting was carried out combine with ESH meeting. However, the minute of meeting with regards to environmental was not properly recorded.
Correction / containment	Environmental meeting will be carried out immediately
Corrective action	Environmental meeting will be carried out on quarterly basis and included in the annual plan
ASA 2 status	<p>Separate EPMC meeting from OSH Committee Meeting is now practised and evident. The is made possible through the Environmental Performance Monitoring Committee (EPMC) Meeting held quarterly. For example, sighted at Jernih Estate the dates held were: 15/10/2018, 12/12/2018, 6/03/2019 and 12/6/2019.</p> <p>The agenda discussed comprised of the following issues;</p> <ul style="list-style-type: none"> a. Objectives & Program Sustainable Environment b. Legal Compliance c. Environmental Control Equipment d. Defects Report (Effluent, Scheduled Waste & Boiler) e. Training and Competency f. Any other business <p>The key purpose of EPMC is to ensure optimal operation of Pollution Control Systems (PCSs) -- environmental monitoring tools - prevention of PCSs failure and systematic management of performance monitoring data and improved regulatory compliance on a sustained basis.</p> <p>Concerns about environmental quality were discussed through various medium such as management meetings and morning briefing. Minutes of meeting were available for verification.</p> <p>Hence, no recurrence of issue and Major NC remained closed.</p>

3.4 Issues Raised by Stakeholders

IS #	Description
1	<p>Feedbacks: MPKK Sungai Mas</p> <p>There same issue raised last year which is on the improvement of the staff quarter road to TAR road since the quarter area is also recognized as the registered village with the state government.</p> <p>Management Responses:</p> <p>The quarters were belonged to the company and although the village is registered with the state government, it was under the estate’s land title. Most of villagers of Sungai Mas were the former workers in estates and management has let them stay for free although no more working with TDM Plantations. According to the road upgrade works, management will prioritize existing workers housing area improvement and due to the bad financial status for palm oil price recently, this will keep on hold.</p> <p>Audit Team Findings:</p> <p>No further issue.</p>
	<p>Feedbacks: MPKK Padang Kubu</p>

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2	<p>For information, there was an accident case causing death due to buffalo encroachment with mill worker's son recently. Villagers will be much appreciated if management willing to install the street lamp near the Kampung Padang Kubu Mosque.</p> <p>Management Responses: The accident case in already reported to DOSH and still under investigation. Management will consider to install the street lamp as per requested.</p> <p>Audit Team Findings: Management action to be verified during next coming audit.</p>
3	<p>Feedbacks: Chong Trading/Kejuruteraan Prisma/FA Sama Trading All the contractors have the same delay in payment issue from TDM Plantations Berhad where this year, 2-4 months of payment delay due to financial crisis. Most of the contractors has a long term business relationship with TDM Plantations Berhad.</p> <p>Management Responses: Management agreed on the contractor's comment and this is because of the financial crisis since the FFB price drop these 2 years. Management take note on the complaint and will escalate to the headquarters.</p> <p>Audit Team Findings: Management action to be verified during next coming audit.</p>
4	<p>Issues: NUPW representatives & Gender Committee So far, there is no complaint or grievance except for the housing maintenances. Workers didn't have any issue regarding salary, freedom to have union and going out, express concern, etc. No discrimination is practised within the complex.</p> <p>Management Responses: Positive feedbancks noted.</p> <p>Audit Team Findings: No further issue.</p>
5	<p>Issues: Jabatan Tenaga Kerja –Cawangan Kemaman (Puan Azizah)-through phone The permit for salary deduction for housing loan approved for PMINT and KETENGAH is needed for each unit.</p> <p>Management Responses: Feedbacks noted.</p> <p>Audit Team Findings: No further issue.</p>

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3.5 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1512739-201708-M1	Major	17/8/2017	Closed on 13/11/2017
1512739-201708-M2	Major	17/8/2017	Closed on 13/11/2017
1512739-201708-M3	Major	17/8/2017	Closed on 13/11/2017
1512739-201708-M4	Major	17/8/2017	Closed on 13/11/2017
1512739-201708-M5	Major	17/8/2017	Closed on 13/11/2017
1512739-201708-M6	Major	17/8/2017	Closed on 13/11/2017
1512739-201708-M7	Major	17/8/2017	Closed on 13/11/2017
1512739-201708-N1	Minor	17/8/2017	Closed on 15/10/2018
1512739-201708-N2	Minor	17/8/2017	Closed on 15/10/2018
1697065-201810-M1	Major	17/10/2018	Closed on 3/1/2019
1697065-201810-M2	Major	17/10/2018	Closed on 3/1/2019
1820365-201908-M1	Major	6/9/2019	Closed on 5/11/2019
1820365-201908-M2	Major	6/9/2019	Closed on 5/11/2019
1820365-201908-M3	Major	6/9/2019	Closed on 5/11/2019
1820365-201908-M4	Major	6/9/2019	Closed on 5/11/2019
1820365-201908-N1	Minor	6/9/2019	Open

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 -	On group level, policy for the implementation of MSPO established as TDM Berhad Sustainability Policy; approved by the BOD of TDM Directors dated 27/3/2018.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The policy emphasized the commitment by management in all its management aspect through: <ul style="list-style-type: none"> - Commitment and responsible management - Transparency - Compliance towards legal requirements - Responsibility in social, health, safety and employment condition - Environmental, natural resources, biodiversity and ecosystem - Best management practices - Responsible new development <p>The policy also included on the commitment to implement continual improvement through gainful utilization of resources among human, process and technology to ensure sustainability production of palm products.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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 -	Internal audit was planned as per 2018 MSPO/RSPO Compliance Audit Plan and conducted from July to August 2019. Records of internal audit report and findings shown the internal audit able to determine the strong and weak points and potential area for further improvement.	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 implement the necessary corrective action. - Major compliance -	Internal audit procedure established as TDM Plantation Sdn. Bhd. STPOM MSPO Internal Audit Standard Operating Procedure; Date: 1/8/2017; Edition: TDMP/01; Rev.: TDMP-01/2017. Identified findings recorded in Sustainability Audit Non-Compliance Findings and Recommendations form as per internal audit report dated 13/8/2019. Sighted the Corrective Action Report on Non-compliance Findings on the analysis of nonconformity raised.	Complied
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	Report made available for review in the management review meeting and recorded in the minutes under " <i>Pembentangan Laporan Audit Dalam Kelestarian MSPO 2019</i> ".	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 -	Management review conducted based on Management Review Standard Operating Procedure; Date: 1/8/2017; Edition: TDMP/01; Revision: TDMP-01/2017. Review meeting planned to be conducted at least annually with previous meeting was conducted on 23/9/2018. Next meeting scheduled to be conducted on November 2019.	Complied

Criterion / Indicator	Assessment Findings	Compliance															
Criterion 4.1.4 – Continual Improvement																	
4.1.4.1	<p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p>- Major compliance -</p>	<p>The mill established a Continuous Improvement Plan FY 2018/2019 dated February 2019 which based on consideration of main social and environmental impact as well as opportunities for company. Amongst all, 2019 completed plan include the following samples:</p> <table border="1" data-bbox="1048 694 1839 1281"> <thead> <tr> <th>Category</th> <th>Issue</th> <th>Plan</th> </tr> </thead> <tbody> <tr> <td rowspan="5">Welfare (Social)</td> <td>Location of workers housing too close to effluent ponds</td> <td>Relocate to safer and better location</td> </tr> <tr> <td>Insufficient workers housing</td> <td>Additional housing construction</td> </tr> <tr> <td>Bad road surface</td> <td>Construction of Pro-base road</td> </tr> <tr> <td>Insufficient drinking water resources</td> <td>Install new water filtration system in workers rest room</td> </tr> <tr> <td>Dirty drinking water in mill</td> <td>Install new water filtration system</td> </tr> </tbody> </table>	Category	Issue	Plan	Welfare (Social)	Location of workers housing too close to effluent ponds	Relocate to safer and better location	Insufficient workers housing	Additional housing construction	Bad road surface	Construction of Pro-base road	Insufficient drinking water resources	Install new water filtration system in workers rest room	Dirty drinking water in mill	Install new water filtration system	<p>Complied</p>
Category	Issue	Plan															
Welfare (Social)	Location of workers housing too close to effluent ponds	Relocate to safer and better location															
	Insufficient workers housing	Additional housing construction															
	Bad road surface	Construction of Pro-base road															
	Insufficient drinking water resources	Install new water filtration system in workers rest room															
	Dirty drinking water in mill	Install new water filtration system															

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Criterion / Indicator		Assessment Findings			Compliance
		Operation (Environmental)	High water usage at ramp for cleaning	Front-end upgrading works	
			Cleanliness problem at front end area	Front-end upgrading works	
			Overflow of effluent during heavy rain	Digging of 2 new ponds and rebuild of flatbeds	
			Integrated Pest Management	Planting of beneficial plant and barn owl box	
			Empty chemical container	Triple rinsing program	
			Domestic waste – plastics	Recycle program	
4.1.4.2	<p>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.</p> <p>- Major compliance -</p>	<p>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.</p>			Complied

Criterion / Indicator		Assessment Findings	Compliance
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 was established as Continuous Improvement Plan for FY 2018/2019.	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 -	Records of communication with stakeholders were sighted. Most of them were related to request for assistance such as donation for sports day, Raya celebration, transportation, and netball pole. The management has responded and provided with assistance. The mill and estates have developed the stakeholder list which included all relevant stakeholders such as local communities, government authorities, contractors and suppliers and etc. Stakeholder meeting was conducted on 02/7/2019 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

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Criterion / Indicator		Assessment Findings	Compliance
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>Documents that publicly available are such as social and environment impact assessment, action plan, meeting minutes and audit reports.</p> <p>Besides, policies were also 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.</p> <p>As per Memorandum by Group Chief Executive Officer; Ref. # TDM/CC/01; Date: 8/4/2018 from Corporate Communication Department to Heads of Subsidiaries, Heads of Department and All Staff of TDM Berhad Group on Sustainability Policies for the new policies approved by the Board on 27/10/201 as following:</p> <ul style="list-style-type: none"> - Sustainability Policy - Environment & Biodiversity Policy - Social & Humanity Policy - Occupational safety & health Policy - Gender & Diversity Policy 	Complied
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has developed a Communication Procedure with POM/ Estates and Flowchart to Handle Social Issue; Version # 2.0/2017. Maximum 28 working days shall be taken to resolve the</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		issues. All internal and external stakeholders were briefed on this procedure.	
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 -	All Estate Managers were appointed as the management officials as per Letter " <i>Perlantikan Sebagai Wakil Syarikat Bagi Mengendalikan Isu Sosial Dengan Pihak Luar Di Peringkat Ladang/Kilang</i> " from Group Human Resource Manager; ref. # TDMP/HR/PSN-GEN(MSPO/RSPO); dated 18/9/2017.	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 -	Stakeholder list was developed where all the affected stakeholders were included into the list such as government authorities, local communities, contractors and supplier, neighboring schools and etc. for the sampled 3 estates. Sampled records maintained as following: - Register of stakeholders 2019 list - External communications letters received - Communication of workers and contractors form Stakeholder meeting was conducted on 02/7/2019 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. Seen the meeting minutes and attendance list. No issue was raised during the meeting.	Complied
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	SOP on the traceability of the FFB has established and describe in the TDM Plantation Sdn. Bhd. Standard Operating Procedure dated	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	for traceability of the relevant product(s). - Major compliance -	21/8/2017. Assistant Manager was responsible and the records were kept by harvesting supervisors.	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Estate supervisor will verify the records related to the traceability of FFB. Sighted the harvesting record for the month of July, August and September 2019, as of 6/9/2019 for all estates.	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The management identified all field and harvesting supervisors to be responsible to implement and maintain the traceability system.	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	Records of sales and delivery/transportation of FFB were maintained and updated on daily basis as part of estate production report. Sample estate FFB delivery to mill records sighted as following: <ul style="list-style-type: none"> - Jernih Estate FFB Despatch Note # 33861; Mill weighbridge docket # P0249837; Date: 28/8/2019; Lorry # TAF106; Net weight: 6,840 kg - Jernih Estate FFB Despatch Note # 33207; Mill weighbridge docket # P0246494; Date: 14/7/2019; Lorry # TBH3495; Net weight: 5,810 kg - Air Putih Estate FFB Despatch Note # 13565; Mill weighbridge docket # P0245643; Date: 27/6/2019; Lorry # TAK4371; Net weight: 9,520 kg 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		- Jernih Estate FFB Despatch Note # 15410; Mill weighbridge docket # P0249992; Date: 30/8/2019; Lorry # TAQ6682; Net weight: 8,670 kg	
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 -	TDM Kemaman estates continued to implement its compliance with legal requirements. Among the evidence of compliance verified were as following: a) Tebak Estate: - MPOB license # 501373102000; Validity period: 1/4/2019 – 31/3/2020; Area: 2,992.33 ha b) Jernih Estate: - MPOB license # 501868102000; Validity period: 1/11/2019 – 31/10/2020; Area: 2,998.60 ha - Schedule Controlled Items Permit (Diesel) Serial # T001552; Ref. # KPDNKK/KMN/25-02/07(02/2017) SK D; Validity Period: 6/8/2019 – 5/8/2020; Volume: 16,380 liter - Schedule Controlled Items Permit (Petrol) Serial # T000061; Ref. # KPDNKK/KMN/25-05/11 P SK; Validity Period: 9/7/2019 – 8/1/2020; Volume: 150 liter	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Unfired Pressure Vessel Certificate of Fitness Reg. # TG PMT 1251; Inspection date: 6/3/2019; Expiry date: 5/6/2020; Max working pressure: 1,034.00 kPa - JTK Approval on <i>Potongan Upah Di Bawah Seksyen 24 Akta Kerja 1955</i>; Ref. # JTK/(T)600.2.2.3 (53); Date: 28/2/2019 for deduction of Tabung Haji, Utilities Bills, PMINT Housing Loan and Temporary Visit Pass c) Air Putih Estate: MPOB License #502606002000 – 3510.19 Ha, validity 1/3/2019– 28/2/2020. 	
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>The management has established the procedure i.e. TDM Plantation Sdn. Bhd. <i>Prosidur Undang-undang dan Lain-lain</i>; Date: 10/2/2019 to identify and maintain alertness of updates in legal and other requirements applicable to its operation. Sighted the Estate Legal Register Year 2019 for all visited estates which listed amongst all, the updated applicable legal and other requirements as per following samples:</p> <ul style="list-style-type: none"> - MAPA Circular # 12/2019 Dated 2/4/2019 on (i) MAPA/NUPW Agreement On The Wages Of Harvesters, Harvesting Kanganies, Loaders And "Other Loaders" On Oil Palm Estates, 2019; (ii) MAPA/NUPW Palm Oil Mill Employees' Agreement. 2019; (iii) MAPA/ NUPW Rubber Tappers' Wage Agreement, 2019; (iv) MAPA/NUPW Field And Other General Employees And Fringe Benefits Agreement, 2019 - OSHA 1996, FMA 1978, Min Housing and Amenities Act 1990 and others. 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	List of applicable legal and other requirements was made available during the assessment and compiled in the Legal Register 2019. Documented procedure has been established and implemented; refer to SOP: Kemaman Palm Oil Mill: Procedure for Legal and Other Requirements dated November 2012. All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. Legal register dated 1/2/2019 is referred to.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. - Minor compliance -	Tracking system on any changes in the law been well implemented with regular notification by Head Office and regular updates from the DOE/DOSH website as well as from government gazette website. The latest updates such as Noise Exposure Regulation 2019 and Minimum Wages Order 2018. Latest MAPA/NUPW Circular no.14/2019 was communicated to all operating units.	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	Estate activities do not diminish the land use rights of other users. Ownership documents sighted i.e. State Title; Ownership # 6521; Lot #7663; Area: 58.7685 ha; District: Kuala Terengganu; Mukim Belara; Date: 18/11/1976; Owner: Perbadanan Memajukan Iktisad Negeri Terengganu; Leasing to: Kumpulan Ladang-ladang Terengganu Sdn. Bhd.; Period: 1/1/1973 – 31/12/2017. Sighted too the Management Agreement as following: - Between Kumpulan Ladang-ladang Terengganu Sdn. Bhd. and TDM Plantation Sdn. Bhd. dated 20/7/2016	Complied

Criterion / Indicator		Assessment Findings	Compliance																																										
		<ul style="list-style-type: none"> - Between TDM Plantation Sdn. Bhd. and TDM Berhad dated 20/7/2016 - Between Kumpulan Ladang-ladang Terengganu Sdn. Bhd. and TDM Berhad dated 1/9/2012 <p>It was noted that the agreements were under review for extension depends on negotiated terms and conditions between both parties.</p>																																											
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>TDM Plantation group estates were able to demonstrate the evidence of legal ownership of its lands through possession of land titles. The estates have a list of all its land titles which have the information about names of lease, hectare, terms & conditions, lease period and grant numbers. Copies of the land titles were available at the estate's offices while the original were kept at headquarter.</p> <p>Examples of land title checked (area in hectares) at the audited estates are shown below. Some land titles are common and shared between two estates. The term and conditions of land use is for Oil Palm Plantation or for Agriculture Purposes.</p> <table border="1"> <thead> <tr> <th>Title No.</th> <th>Tebak Estate</th> <th>Pelantoh Estate</th> <th>Jernih Estate</th> <th>Air Putih Estate</th> <th>Tenure</th> </tr> </thead> <tbody> <tr> <td>QTR Kemaman 1</td> <td></td> <td></td> <td></td> <td>129.50</td> <td>17.4.2058</td> </tr> <tr> <td>QTR Kemaman 2</td> <td></td> <td></td> <td></td> <td>414.41</td> <td>17.4.2058</td> </tr> <tr> <td>QTR Kemaman 3</td> <td></td> <td></td> <td></td> <td>984.22</td> <td>17.4.2058</td> </tr> <tr> <td>QTR Kemaman 4</td> <td></td> <td></td> <td></td> <td>1916.63</td> <td>17.4.2058</td> </tr> <tr> <td>QTR Kemaman 11</td> <td>460.22</td> <td>2796.28</td> <td></td> <td></td> <td>30.6.2059</td> </tr> <tr> <td>QTR Kemaman 12</td> <td>2349.86</td> <td></td> <td>1598.66</td> <td></td> <td>31.7.2060</td> </tr> </tbody> </table>	Title No.	Tebak Estate	Pelantoh Estate	Jernih Estate	Air Putih Estate	Tenure	QTR Kemaman 1				129.50	17.4.2058	QTR Kemaman 2				414.41	17.4.2058	QTR Kemaman 3				984.22	17.4.2058	QTR Kemaman 4				1916.63	17.4.2058	QTR Kemaman 11	460.22	2796.28			30.6.2059	QTR Kemaman 12	2349.86		1598.66		31.7.2060	Complied
Title No.	Tebak Estate	Pelantoh Estate	Jernih Estate	Air Putih Estate	Tenure																																								
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Criterion / Indicator		Assessment Findings					Compliance
		HS (D) 1779	78.79		3602.31	19.12.2052	
		GRN 18274 HS (D) 2871	8.80		209.40	19.12.2052	
		All lands are leased from the Trengganu State Government. There is no land dispute in Kemaman operating units at the time of audit. The land belongs to TDM and land ownership documents verified. Interviewed with the local communities confirmed that no land dispute case has been reported.					
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The estate boundary is well maintained with the construction of boundary pegs. Sighted available marker pole at Tebak Estate Field 17A/18A, Elephant Trenching/Electric Fence near Hutan Ulu Paka - Rasah, and at Jernih Estate, Field 04A at Conservation Area >25°. There are more than 10 boundary pegs, painted with red and white stripe installed at the boundary of the estate and are evidence in Layout Plan with details GPS Coordinate.					Complied
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 land dispute in TDM Kemaman complex at the time of audit. The land belongs to TDM and land ownership documents verified.					Complied
Criterion 4.3.3 – Customary rights							

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 -	No any lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	No any lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	No any lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	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. - Minor compliance -	Implementation was as per TDM Plantation Sdn. Bhd. Social Impact Assessment (SIA) Kompleks Kemaman; A report prepared by SRA Consultancy, Senawang, Negeri Sembilan for TDM dated November 2011 was made available during audit. Based on the assessment, action plan was established on annual basis as per sighted Management Plan & Progress On Social Impact Assessment; Review date: 21/2/2019. Sighted area of concerns including housing and infrastructure with social impact identified were poor facilities and infrastructure, housing not complying with legal requirement, poor	Complied

Criterion / Indicator		Assessment Findings	Compliance
		waste dumpsite and etc. Progress of improvement plan shown most of the areas of concerns have been completed such as issues on poor drainage and septic tank system at line site while some were done continuously on annual basis for improvement plan such as construction of new workers quarters. Latest improvement plan also includes the proposal to upgrade existing store and dining hall in crèche and kindergarten (Tabika Kemas) in 2020.	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	A system for dealing with complaints and grievances were established and documented as a Flowchart on Handling Social Issue and Complaint/ Grievance Procedure. Any issue raised by stakeholders will be discuss within 2 weeks for the first meeting and issues to be resolved within 28 working days.	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 -	Based on the records of Complaint Logbooks in visited estates, it was verified that all complaints and action able to be resolved in effective, timely and appropriate manner. Verification of resolution signatures by Officer, Assistant Manager and Manager were sighted.	Complied
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 -	Complaint Logbook for Linesite Repair and Complaint/ Request form was established and implemented. No external stakeholders were recorded related on complaint and grievances.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.	Interview with internal and external stakeholders during stakeholder consultation found that they were aware of the complaint procedure	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	and they were briefed by the management during stakeholder meeting	
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 -	The complaint logbook/ complaint files that recorded complaints and solutions since at least January 2014 was maintained available to affected stakeholders upon request.	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 -	Contributions were made as part of Continuous Improvement Plan FY2018/2019 Review on 4/12/2018. Sighted contributions were made included following: - Provision of van for transport of SK Padang Kubu student attending pre-UPSR examination programs in Marang, Terengganu; date: 23-24/8/2019 - Donation for SMK Seri Bandi PIBG as co-organizer for 2019 school athletics program; date: 25/4/2019 - Donation for SK Kampung Fikri PIBG as co-organizer for school children learning tour program to Cameron Highlands; date: 1-2/3/2019 - Provision of vans for transport of the Pertubuhan Cakna Anak Yatim Kemaman orphans programs on 6/5/2019	Complied
Criterion 4.4.4: Employees safety and health			

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Criterion / Indicator		Assessment Findings	Compliance
4.4.4.1	<p>An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has established, implemented and maintained its Occupational, Safety & Health Policy dated 1/9/2017, signed by CEO, Mr Jailani Bin Che Kar. It is seen communicated by displaying hard copy at notice boards and through MSPO Policy and its subsidiary policies briefing.</p> <p>OHS plan for 2019 has been developed to cover all activities involved at the estates. Please see indicator 4.4.4.2 below for details.</p>	Complied
4.4.4.2	<p>The occupational safety and health plan shall cover the following:</p> <p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risks of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</p> <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 <p>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).</p>	<p>a) TDM Plantations Sdn Bhd has established its 2019 Occupational Safety & Health Plan.</p> <p>Interview with workers and staff confirmed that they were aware of the company safety and health policy as it has been communicated and occasionally reminded during morning muster.</p> <p>b) Risk had been assessed and documented in HIRRC Register at the audited estates. At Jernih Estate it was last reviewed on 8/10/2018 following an accident. At Tebak Estate and Air Putih Estate the latest review was on 28/01/2019 and 11/04/2019 respectively.</p> <p>HIRARC related to activities such as:</p> <ul style="list-style-type: none"> - in the field - harvesting, spraying, manuring, weeding, pruning & sanitation, road / drainage maintenance, driving, transporting workers and - at workshop, for example, welding, grinding, farm tractor servicing and maintenance were assessed and reviewed. 	Major non-compliance

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Criterion / Indicator	Assessment Findings	Compliance
<p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>Nonetheless, a Major NCR has been issued as coverage of activities had not been risk assessed and documented at Lubricant store (Jernih and Air Putih Estate), and Diesel Storage tank (Jernih Estate).</p> <p>Where chemicals are used at the estates, Chemical Health Risk Assessment (CHRA) had been verified conducted by engaging DOSH-Registered Assessor. Their reports remained valid. Sample CHRA report at Jernih Estate dated 24/05/2016 and at Air Putih Estate 12/12/2017.</p> <p>Findings or recommendations listed by the Assessor were actioned accordingly.</p> <p>c) Awareness and training program for employees exposed to pesticides had been carried out at all estates assessed. Training and Refresher training on Chemical handling, PPE and individual SOP for Sprayers, Manurers and Nursery workers were conducted annually. The objective was to ensure all workers involved have been adequately trained in understanding SDS, Safe Work Practices and the correct use of PPE as well the dangers the chemical posed. The emphasis of training is on safety, health and environmental risks of chemicals exposure as well as risk recognition of acute and long-term exposure symptom. Reference to information in Chemical Safety Data Sheet, in particular, all precautions attached to the products were explained as well as emphasis on the importance for donning PPE correctly.</p> <p>Random interviews with workers (Sprayers, Manurers, Nursery workers, Storekeeper and Mandores) confirmed they understood the need to work safely and the potential safety and health</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>consequences that may result of their behavior, departure from specified SOP and the OH&S benefits of improved personal performance. For example, they understood the hazards involved and the need to use PPE to protect. Inspection of stores (chemical, fertilizer, POL) were found to be adequately organized, properly labelled, secured and person in charge understands the OSH practices during emergency. SDS placed on file was available and the Storekeeper understood the information written in SDS.</p> <p>d) Suitable PPE has been provided to the workers based on the information in the HIRARC Register, SDS and CHRA assessor's recommendation. During the site visit, the PPE were adequately implemented, for example, to harvesting, spraying and manuring gang.</p> <p>Sighted common PPE issued include safety helmets, Wellington boots, gloves and goggles/safety glass. PPE issuance record at each estate was verified. In addition to basic PPE, special PPE are also provided for workers assigned to dangerous operation such as sprayers, specifically R95 respirators, nitrile rubber gloves and apron.</p> <p>e) The estates follow company established SOP Chemical Handling to ensure proper and safe handling and storage in accordance to Occupational Safety Health (CLASS) Regulation 2013 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>The application of pesticides was guided by CHRA, SDS of the Chemical, MPOB Code of Good Agricultural Practice for Oil Palm Estates and Small Holdings, and, Standard Operating Procedure</p>	

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Criterion / Indicator	Assessment Findings	Compliance																				
	<p>f) The person in-charge for overall safety and health at TDM Plantations Sdn Bhd is the HQ Safety & Health Officer, DOSH Registration No. HQ/16/SHO/01/00345 appointed effective 01/01/2015. At estate level he is supported by site Compliance Executive (Assistant Manager) and the OSH Committee.</p> <p>g) Safety & Health Committee has been established as sighted in the 2019 OSH Committee Organization Chart. Each estate assessed conduct at three monthly intervals their OSH Committee meeting as follows:</p> <table border="1" data-bbox="1048 770 1863 970"> <thead> <tr> <th data-bbox="1048 770 1216 818">Estate</th> <th colspan="4" data-bbox="1216 770 1863 818">Meeting dates</th> </tr> </thead> <tbody> <tr> <td data-bbox="1048 818 1216 866">Tebak</td> <td data-bbox="1216 818 1384 866">23.10.2018</td> <td data-bbox="1384 818 1552 866">20.12.2018</td> <td data-bbox="1552 818 1720 866">19.3.2019</td> <td data-bbox="1720 818 1863 866">26.6.2019</td> </tr> <tr> <td data-bbox="1048 866 1216 914">Jernih</td> <td data-bbox="1216 866 1384 914">7.10.2018</td> <td data-bbox="1384 866 1552 914">19.12.2018</td> <td data-bbox="1552 866 1720 914">18.3.2019</td> <td data-bbox="1720 866 1863 914">19.6.2019</td> </tr> <tr> <td data-bbox="1048 914 1216 962">Air Putih</td> <td data-bbox="1216 914 1384 962">10.9.2018</td> <td data-bbox="1384 914 1552 962">30.12.2018</td> <td data-bbox="1552 914 1720 962">24.3.2019</td> <td data-bbox="1720 914 1863 962">26.6.2019</td> </tr> </tbody> </table> <p>Viewing the minutes, the meeting had discussed issues related to employees' safety, health and welfare to improve conditions on the job and develop strategies to make the work environment safe and healthy. Discussion include Building and Line Site Inspection, Training, Emergency Response and Preparedness and Environment. Unsafe or unhealthy work conditions needing corrective action were acted.</p> <p>All records of meeting are kept and maintained.</p>	Estate	Meeting dates				Tebak	23.10.2018	20.12.2018	19.3.2019	26.6.2019	Jernih	7.10.2018	19.12.2018	18.3.2019	19.6.2019	Air Putih	10.9.2018	30.12.2018	24.3.2019	26.6.2019	
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Air Putih	10.9.2018	30.12.2018	24.3.2019	26.6.2019																		

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Criterion / Indicator	Assessment Findings	Compliance
	<p>h) All estates have Accident and Emergency procedures in addition to Emergency Preparedness and Response Plan. They too have established their own Estate Emergency Response Team. Sighted the organization chart for 2019 available and displayed at each estate office noticeboard.</p> <p>A common ERP had been developed that include the following credible scenarios identified, i.e. fire, flood, explosion, chemical spillage, and accident. The estate has site specific Plans including maps showing assembly areas and up-to-date lists of emergency contacts with training conducted to communicate the Plan. Interviews of estate staff and workers confirmed their understanding of emergency response as shown during participation in emergency drill. Emergency Response and evacuation drill was executed at Jernih Estate on 25.08.2019, at Air Putih Estate on 24.6.2019 and at Tebak Estate jointly with BOMBA Cheneh on 25.8.2019.</p> <p>i) There are adequate number of trained First Aiders in the field. All of them are Mandores of respective work gang. First aid kits were made available in the field. The custodian is Mandore. Field inspection of the First Aid kits revealed its contents were complete, up-to-date and no sedative or expired medication found as it was regularly checked and replenished by the Estate Hospital Assistant.</p> <p>j) Records on all accidents and diseases arising out of or in connection with work which occur at the place of work had been verified maintained satisfactorily. Quarterly review on accident cases were carried out during Safety & Health (OSH) Committee meeting.</p> <p>For example, checked the last accident recorded at Jernih Estate was on 1/10/2018 where a Harvester slipped and fell into hole while harvesting at Field 04/Block B1. He was given 12 days sick leave by</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		Kemaman Hospital. Accident investigation was carried out and form JKPP 6 submitted to DOSH on 6.10.2018. Also Form JKPP 8 (Register of Accident, Dangerous Occurrence, Occupational Poisoning and Occupational Disease for 2018) was submitted promptly to DOSH on 15.1.2019	
Criterion 4.4.5: Employment conditions			
4.4.5.1	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees. - Major compliance -	TDM Plantation Sdn Bhd has developed Human Rights Policy dated 1/6/2017 and Social Policy dated 1/6/2017 which signed by CEO. Briefing of the policies were provided to the workers on 20/8/2017. The policies were displayed at the notice board outside the office.	Complied
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 Human Rights Policy dated 1/6/2017 and Social Policy dated 1/6/2017 which signed by CEO. These policies have stated that the management was committed to treat everyone equally without any discrimination and provide equal opportunities regardless of race, nationality, gender and etc. Interviewed with workers confirmed that no discrimination was practice by the management. Briefing of the policies were provided to the workers on 20/8/2019. The policies were displayed at the notice board outside the office.	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	The management have ensured that employees' pay and conditions meet applicable legal requirements i.e. National Minimum Wages Order 2018. Sighted payslips for following Tebak Estate sampled workers:	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>on minimum wage.</p> <p>- Major compliance -</p>	<ul style="list-style-type: none"> - Employee ID: TB1701034; Gang 12 (General Worker); Date join: 16/5/2017; Nationality: Malaysia - Employee ID: TB1600994; Gang 03 (General Worker); Date join: 1/1/2017; Nationality: Malaysia - Employee ID: TB09000396; Gang 08 (General Worker); Date join: 1/8/2009; Nationality: Malaysia - Employee ID: TB1300753; Gang 15 (Harvester); Date join: 17/12/2018; Nationality: Indonesia - Employee ID: TB1701039; Gang 13 (Harvester); Date join: 18/6/2019; Nationality: Indonesia - Employee ID: TB1701039; Gang 12 (Field Worker); Date join: 28/2/2019; Nationality: Indonesia - Employee ID: TB1400811; Gang 12 (Harvester); Date join: 6/5/2019; Nationality: Bangladesh - Employee ID: TB1801090; Gang 12 (Field Worker); Date join: 2/4/2019; Nationality: Bangladesh <p>Jernih Estate sampled workers:</p> <ul style="list-style-type: none"> - Employee ID: JN00035; Gang 07 (Mandore); Date join: 1/1/1994; Nationality: Malaysia - Employee ID: JN1100486; Gang 07 (Harvester); Date join: 31/7/2011; Nationality: Indonesia - Employee ID: JN1900881; Gang 08 (Harvester); Date join: 20/3/2019; Nationality: Indonesia 	

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Employee ID: JN1800819; Gang 10 (Harvester); Date join: 17/12/2018; Nationality: Indonesia <p>Air Putih Estate sampled workers:</p> <ul style="list-style-type: none"> - Employee ID: AP1601160; Gang 01 (Field Worker); Date join: 3/9/2016; Nationality: Malaysia - Employee ID: AP1801235; Gang 06 (Harvester); Date join: 10/3/2018; Nationality: Indonesia - Employee ID: AP1801269; Gang 09 (Harvester); Date join: 28/3/2018; Nationality: Bangladesh - Employee ID: AP1801317; Gang 11 (Field Worker); Date join: 10/10/2018; Nationality: Malaysia - Employee ID: AP1801351; Gang 06 (Harvester); Date join: 28/3/2018; Nationality: Indonesia 	
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>Management ensured employees of contractors are paid based on legal standards as per MAPA Circular No. 44/2018; Date: 29/11/2018 which referring to the Minimum Wages Order (Amendment) 2018 that would come into operation on 1/1/2019. Sighted the sampled payslips records of the contractor's workers at Tebak Estate as following:</p> <ul style="list-style-type: none"> - Employee ID: TB1300753; Gang 15 (Harvester); Date join: 17/12/2018; Nationality: Indonesia - Employee ID: TB1701039; Gang 13 (Harvester); Date join: 18/6/2019; Nationality: Indonesia 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		- Employee ID: TB1400811; Gang 12 (Harvester); Date join: 6/5/2019; Nationality: Bangladesh; Payslips for Jan 2019 shown	
4.4.5.5	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. - Major compliance -	There is a list of employees consist of employee number, name, division, pay, NRIC/Passport no, employment category, nationality, DOB, age, race and status in the HR/Payroll system sighted as at August 2019.	Complied
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 is available for each and every employee indicated in the employment records. - Major compliance -	Fair contracts have been signed by both employee and employer with both kept a copy each. Sighted contracts for following Tebak Estate sampled workers: <ul style="list-style-type: none"> - Employee ID: TB1701034; Gang 12 (General Worker); Date join: 16/5/2017; Nationality: Malaysia - Employee ID: TB1600994; Gang 03 (General Worker); Date join: 1/1/2017; Nationality: Malaysia - Employee ID: TB09000396; Gang 08 (General Worker); Date join: 1/8/2009; Nationality: Malaysia - Employee ID: TB1300753; Gang 15 (Harvester); Date join: 17/12/2018; Nationality: Indonesia - Employee ID: TB1701039; Gang 13 (Harvester); Date join: 18/6/2019; Nationality: Indonesia - Employee ID: TB1701039; Gang 12 (Field Worker); Date join: 28/2/2019; Nationality: Indonesia 	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Employee ID: TB1400811; Gang 12 (Harvester); Date join: 6/5/2019; Nationality: Bangladesh - Employee ID: TB1801090; Gang 12 (Field Worker); Date join: 2/4/2019; Nationality: Bangladesh <p>Jernih Estate sampled workers:</p> <ul style="list-style-type: none"> - Employee ID: JN00035; Gang 07 (Mandore); Date join: 1/1/1994; Nationality: Malaysia - Employee ID: JN1100486; Gang 07 (Harvester); Date join: 31/7/2011; Nationality: Indonesia - Employee ID: JN1900881; Gang 08 (Harvester); Date join: 20/3/2019; Nationality: Indonesia - Employee ID: JN1800819; Gang 10 (Harvester); Date join: 17/12/2018; Nationality: Indonesia <p>Air Putih Estate sampled workers:</p> <ul style="list-style-type: none"> - Employee ID: AP1601160; Gang 01 (Field Worker); Date join: 3/9/2016; Nationality: Malaysia - Employee ID: AP1801235; Gang 06 (Harvester); Date join: 10/3/2018; Nationality: Indonesia - Employee ID: AP1801269; Gang 09 (Harvester); Date join: 28/3/2018; Nationality: Bangladesh - Employee ID: AP1801317; Gang 11 (Field Worker); Date join: 10/10/2018; Nationality: Malaysia 	

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Criterion / Indicator		Assessment Findings	Compliance
		- Employee ID: AP1801351; Gang 06 (Harvester); Date join: 28/3/2018; Nationality: Indonesia	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. - Major compliance -	Recording system established and implemented through the punch card check roll system with reports generated as the Time and Attendance Report for the computation of working hours and overtime that is transparent for both employees and employers.	Complied
4.4.5.8	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. - Major compliance -	Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to the Employment Act 1955. As at current status, there was none has crossed 104 hours of overtime. Verified the payslips, the payment and calculation of overt time well distributed. Overtime rate after 8 hours daily-rated (upkeeps) is as following: <ul style="list-style-type: none"> - Sun - Thu – daily rated / 8 hours x 1.5 - Friday - daily rated / 8 hours x 2.0 - Public holiday – daily rated / 8 hours x 3.0 Overtime rate after 8 hours piece-rated (harvester) is as following: <ul style="list-style-type: none"> - Sun - Thu – flat rate - Friday – flat rate x 2.0 - Public holiday – flat rate x 3.0 	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.	Wages and overtime payment documented found consistent with legal regulations and collective agreements as per sample sighted in indicator 4.4.5.3 above.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.4.5.10	<p>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.</p> <p>- Minor compliance -</p>	<p>Other forms of social benefits for workers including the mandatory contribution for local workers & staff of Social Security Organization (SOCISO) Monthly Contribution sighted as per sample sighted as following:</p> <ul style="list-style-type: none"> - Tebak Estate: Form 8A Socso Acknowledgement Contribution Received (ACR); Employer Code: F8100000658Z; Period: 07/2019; Date: 3/8/2019 - Jernih Estate: Form 8A Socso Acknowledgement Contribution Received (ACR); Employer Code: F8100000660A; Period: 07/2019; Date: 13/8/2019 	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 in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p>- Major compliance -</p>	<p>On-site living quarters are provided and visit to the housing area/line site showed quarters are decently habitable and equipped with basic amenities of free electricity and water supply including other facilities such as mosque, community hall, sundry store, canteen, children's crèche and football field.</p> <p>Common clinic shared between Tebak, Jernih and Pelantoh Estate and Kemaman Mill located in Tebak Estate operated by 2 Estate Hospital Assistants (EHA). Air Putih Estate has own clinic and EHA. Sighted the latest housing inspection records shown the following:</p> <ul style="list-style-type: none"> - Last housing & crèche inspection done on 28/8/2019 for Block A, B, C, D, F & G. Blok B banyak sampah dalam guni belum buang; Blok C paip bocor, rumput panjang; Blok F kawasan semak dengan tanaman; Blok G kayu berselerak depan rumah 	OFI

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Criterion / Indicator		Assessment Findings	Compliance
		<p>- Latest VMO visit dated on 20/8/2019 by appointed VMO from Klinik Medic Bestari Paka</p> <p>However, non-authorized additional construction and extension or renovation of company's house shall be observed.</p>	
4.4.5.12	<p>The management shall establish a policy and provide guidelines 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 and Reproductive Policy dated 1/6/2017 which signed by CEO. The management will ensure the workplace and surrounding are free from any types of harassment included ethnic harassment, religious, gender, country of origin and etc. They will ensure that the rights of women will be protected.</p>	Complied
4.4.5.13	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has developed Gender Policy and Reproductive Policy dated 1/6/2017 which signed by CEO. The management will ensure the workplace and surrounding are free from any types of harassment included ethnic harassment, religious, gender, country of origin and etc. They will ensure that the rights of women will be protected.</p>	Complied
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</p>	<p>TDM Plantation Sdn Bhd has developed Child Protection Policy dated 1/6/2017 which signed by CEO. The company will not recruit or exploit any individual less than 16 years old to work in the company. Seen the employee master list confirmed that all the workers were</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																																								
	programmes. Children shall not exposed to hazardous working conditions. - Major compliance -	above 18 years old. Besides, interviewed with workers and stakeholders confirmed that TDM Plantation Sdn Bhd did not recruit any workers less than 18 years old.																																									
Criterion 4.4.6: Training and competency																																											
4.4.6.1	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept. - Major compliance -	<p>Formal training program published for year 2018/19 covered all aspects of the Environment, Safety, Social, and MSPO. Regular assessments of training needs and records of training were presented to auditors by the estates assessed. The below training programs were randomly sampled to verify being conducted:</p> <table border="1"> <thead> <tr> <th></th> <th>Training title</th> <th>Date held</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td colspan="4">Jernih Estate</td> </tr> <tr> <td>1</td> <td>Safety, Health & Environment Policy</td> <td>22.7.2019</td> <td>250</td> </tr> <tr> <td>2</td> <td>Buffer zone</td> <td>17.8.2019</td> <td>28</td> </tr> <tr> <td>3</td> <td>PPE</td> <td>19.8.2019</td> <td>251</td> </tr> <tr> <td>4</td> <td>HCV Flora and Fauna</td> <td>13.8.2019</td> <td>106</td> </tr> <tr> <td>5</td> <td>OSH Management</td> <td>13.3.2019</td> <td>20</td> </tr> <tr> <td colspan="4">Tebak Estate</td> </tr> <tr> <td>1</td> <td>SOP Chemical Spraying</td> <td>6.3.2019</td> <td>23</td> </tr> <tr> <td>2</td> <td>Ablation</td> <td>21.1.2019</td> <td>11</td> </tr> </tbody> </table>		Training title	Date held	Attendees	Jernih Estate				1	Safety, Health & Environment Policy	22.7.2019	250	2	Buffer zone	17.8.2019	28	3	PPE	19.8.2019	251	4	HCV Flora and Fauna	13.8.2019	106	5	OSH Management	13.3.2019	20	Tebak Estate				1	SOP Chemical Spraying	6.3.2019	23	2	Ablation	21.1.2019	11	Complied
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Criterion / Indicator		Assessment Findings				Compliance
		3	Young oil palm planting	20.5.2019	25	
		4	MSPO P&C Awareness	8.8.2019	250	
		5	Rat Baiting	21.2.2019	10	
		Air Putih Estate				
		1	Scheduled Waste Management	29.11.2018	16	
		2	SOP Nursery	17.2.2019	5	
		3	SOP Manuring	21.2.2019	8	
		4	Emergency Response & fire drill	24.6.2019	All	
		5	First Aid	15.7.2019	8	
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>Formal training program on all aspects of MSPO requirements for the year 2019 was established, published and made available at beginning of Year for implementation. Training for various categories of employees, including all field workers and office staff, with regards to their duties and training needs had been reviewed and found acceptable.</p> <p>Training identification and needs analysis were applied to recognize the staff, workers and contractor’s deficient skills or knowledge gaps, particularly, with respect to their job description. Training was then organized and delivered by Internal staff choosing from the training programs established.</p>				

Criterion / Indicator		Assessment Findings	Compliance
		Methodology delivering training to workers are commonly On-The-Job Training, Coaching/Mentoring and Hands-on Practical Session with plenty of Graphical/Pictorial illustration than wordings as these approach get their attention and better understanding.	
4.4.6.3	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. - Minor compliance -	A continuous training programme was established at the beginning of calendar year 2019. The training topics covered are generally a repeat of previous year, that is, sample as provided in indicator 4.4.6.1 above. From random interview with workers, they were found to be aware of the Standard Operating Procedures, product quality, safety, health, environment and social matters.	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	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 1 st September 2017. 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.	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.	In line with the environmental policy, the established environmental objectives had focused on to promote environmental awareness among the employees, conservation and management of the environment and ensure biodiversity and conservation area is protected and enhanced.	Major noncompliance

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>All estates have conducted the environmental aspects and impacts risk assessment for all activities, products and services related to field operation as well as other facilities such as the workshop, scheduled wastes and chemical stores and subsequently to evaluate the significance of the associated environmental impacts. This exercise is documented in the Environmental Aspect and Impact Identification (EAI) Register 2017, example, at Jernih Estate (date: 1 May 2011 TDM/LJN/01 rev. LJN-01-2011) and are reviewed annually at all estates assessed.</p> <p>Although the estate’s Environmental Aspect Impact Register was last reviewed on 18.3.2019, verification of the assessment showed that the use of the lead-acid storage batteries had not been identified in the register, hence the impact is not known and no waste management plan developed. A Non-conformity report is therefore raised.</p>	
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>Environmental Improvement Plan was available and updated in January 2019. The Plan is implemented, progress monitored and reported at all estates audited. The list of environmental improvement plan screen are:</p> <ul style="list-style-type: none"> a. River water quality monitoring b. Waste management c. Reduction of pesticide use d. Recycling <p>The Plan in table format has headers listing environmental issue, mitigating measure, action PIC, time frame and status.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		The objective is to mitigate and monitor the identified significant activities that give impacts on environment. Specific persons in-charged have been identified to do the monitoring to ensure the plan is effectively implemented.	
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	All estates have continued and promote the positive impacts, among them being: <ul style="list-style-type: none"> - zero burning - planting Leguminous cover crop (LCC), - maintained buffer zone along the natural water stream - substitute practice chemical fertilizer to organic fertilizer application such as EFB, compost, decanter cake, POME and palm residues at replanting to reduce GHG emission - frond stacking at interlines as nutrient recycling - regular vehicle maintenance for efficient fuel consumption and prevention of lubricant leakages - rainwater harvesting - 3R program <ul style="list-style-type: none"> • reuse of empty fertilizer bag for Loose Fruit collection (after it has been washed clean) • chemical containers triple rinsed and pierced and send to recycler • reduction of pesticide usage through <ul style="list-style-type: none"> ✓ IPM – use of predators such as barn owl to control rats, planting of beneficial plants, ✓ roto and manual slashing 	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	Environmental Policy awareness and understanding of the objectives on Environmental management were adequately conducted and conveyed to staff and workers at the below dates:	Complied

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Criterion / Indicator		Assessment Findings			Compliance	
	improvement plans and are working towards achieving the objectives. - Major compliance -	Estate	Training Title	Date		
		Tebak	Briefing on all 14 Policies			6.8.2019
			Latihan kepada semua pekerja tentang Bio-D and Alam Sekitar			13.8.2019
		Jernih	Safety, Health & Environmental Policy			22.7.2019
		Air Putih	Environmental, Safety & Health Policy			29.7.2019
		Random interviews with the employees showed that their understandings towards achieving the environmental objectives were good.				
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	<p>The is made possible through the Environmental Performance Monitoring Committee (EPMC) Meeting held quarterly. For example, sighted at Jernih Estate the dates held were: 15/10/2018, 12/12/2018, 6/03/2019 and 12/6/2019.</p> <p>The agenda discussed comprised of the following issues;</p> <ul style="list-style-type: none"> a. Objectives & Program Sustainable Environment b. Legal Compliance c. Environmental Control Equipment d. Defects Report (Effluent, Scheduled Waste & Boiler) e. Training and Competency f. Any other business <p>The key purpose of EPMC is to ensure optimal operation of Pollution Control Systems (PCSs) -- environmental monitoring tools - prevention of PCSs failure and systematic management of</p>			Complied	

Criterion / Indicator		Assessment Findings	Compliance																											
		<p>performance monitoring data and improved regulatory compliance on a sustained basis.</p> <p>Concerns about environmental quality were discussed through various medium such as management meetings and morning briefing. Minutes of meeting were available for verification.</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 used for transportation and generation of electricity. It is monitored to optimize use of non-renewable energy for reference. Data is being compiled for comparison and control for future improvement and reduction plan.</p> <p>Monthly records YTD august 2019 on energy consumption in l/mt FFB processed for non-renewable fuel (diesel) were maintained at the estates.as follows:</p> <table border="1"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="3">Diesel consumption, lt/FFB processed</th> </tr> <tr> <th>Tebak</th> <th>Jernih</th> <th>Air Putih</th> </tr> </thead> <tbody> <tr> <td>Jan 2019</td> <td>1.83</td> <td>2.60</td> <td>3.64</td> </tr> <tr> <td>Feb</td> <td>1.95</td> <td>3.00</td> <td>4.42</td> </tr> <tr> <td>Mar</td> <td>1.82</td> <td>2.55</td> <td>4.09</td> </tr> <tr> <td>Apr</td> <td>1.89</td> <td>2.74</td> <td>4.50</td> </tr> <tr> <td>May</td> <td>2.14</td> <td>3.03</td> <td>1.09</td> </tr> </tbody> </table>	Month	Diesel consumption, lt/FFB processed			Tebak	Jernih	Air Putih	Jan 2019	1.83	2.60	3.64	Feb	1.95	3.00	4.42	Mar	1.82	2.55	4.09	Apr	1.89	2.74	4.50	May	2.14	3.03	1.09	Complied
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Criterion / Indicator		Assessment Findings				Compliance
		Jun	2.23	2.93	1.85	
		Jul	2.54	2.58	1.79	
		Aug	2.16	2.35	1.36	
4.5.2.2	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. - Major compliance -	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.				Complied
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 -	The estates assessed had established Waste Management Action Plan 2019. Type of waste identified were: 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 and shop. For estates, its reusable and recyclable wastes identified included empty fertilizer bags and triple rinsed empty chemical containers. Organic biomass waste generated by estates including fronds and chipped fell palms. Other specific activities such as estate vehicle				Complied

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Criterion / Indicator		Assessment Findings	Compliance												
		workshop generate few categories of scheduled waste such as SW 305, SW 306, SW 307, SW 409, SW 410 and SW 425.													
4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>a) Identifying and monitoring sources of waste and pollution</p> <p>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</p> <p>- Major compliance -</p>	<p>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"> <thead> <tr> <th>Waste</th> <th>Location</th> <th>Action to be Taken</th> </tr> </thead> <tbody> <tr> <td>Scheduled waste</td> <td>Estate workshop, chemical store and schedule waste store</td> <td>Collect and record inventory, store under lock and key, label container and disposed through DOE licensed contractor</td> </tr> <tr> <td>Domestic waste</td> <td>Line site, office, workshop, store, shop</td> <td>Collect recyclable materials (paper, aluminum, plastic, glass) and send to recycling center. Collect other domestic waste and send to landfill.</td> </tr> <tr> <td>Industrial waste</td> <td>In the field, Estate office.</td> <td>Stack pruned palm fronds at palm oil tree interline as nutrient Sell scrap iron as recycle waste</td> </tr> </tbody> </table>	Waste	Location	Action to be Taken	Scheduled waste	Estate workshop, chemical store and schedule waste store	Collect and record inventory, store under lock and key, label container and disposed through DOE licensed contractor	Domestic waste	Line site, office, workshop, store, shop	Collect recyclable materials (paper, aluminum, plastic, glass) and send to recycling center. Collect other domestic waste and send to landfill.	Industrial waste	In the field, Estate office.	Stack pruned palm fronds at palm oil tree interline as nutrient Sell scrap iron as recycle waste	Complied
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Criterion / Indicator	Assessment Findings	Compliance
<p>4.5.3.3</p> <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 the methodology for handling used chemical containers to ensure they are disposed in an environmentally and socially responsible manner.</p> <ul style="list-style-type: none"> - Collect Scheduled Waste container and record inventory. Store under lock and key. Label container as per DOE guideline and disposed through DOE licensed contractor. Use eSwis to report disposal to DOE. 	<p>Complied</p>
<p>4.5.3.4</p> <p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's 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>Included in the above same SOP in Indicator 4.5.3.3 is handling or treatment to dispose used chemical containers. It is cross reference to MPOB Guidelines and is enumerated below so that there is no risk of contamination of water sources or to human health.</p> <ul style="list-style-type: none"> - Collect empty pesticides container. Recover remaining residues, then triple rinsed container with clean water and collect the rinsed water for future spray application in the field. Subsequently, perforate bottom of the containers. Store and record containers pierced. Then call licensed contractor to collect from the estate. 	<p>Complied</p>
<p>4.5.3.5</p> <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>Domestic wastes were collected from line site and buried in a designated landfill area in the oil palm estate. Landfill map was available. The construction of landfill is guided by TDM SOP June 2017; Section B8: Guidance for establishing landfill within the estate. The location of land fill to be at least 3 km far from the watercourse and residential area.</p> <p>Site visit at Tebak Estate (Field 95 A /Block 1), Jernih Estate (Field 06A / Block 1) and Air Putih Estate (Field 96A / Block 1) confirmed it is more than 3 km from workers' quarters and from watercourse. Sighted there was no toxic wastes such as spent lubricants, empty</p>	<p>Minor noncompliance</p>

Criterion / Indicator		Assessment Findings	Compliance
		<p>chemical containers, used lab chemical, etc. were disposed in the rubbish pit.</p> <p>The area is generally fenced up with warning signboard erected except for the following lapses:</p> <ul style="list-style-type: none"> - Air Putih Estate has not fenced up the 3rd landfill plot, no safety warning signage erected and no records of disposal (that is, no opening and closing date at each plot of the landfill). - At Jernih Estate landfill there was no record of disposal. - At Tebak Estate the frequency of domestic waste collection from line site could be improved instead of 5-9 days. <p>Thus, a Minor Non Conformity Report was raised.</p>	
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>All polluting activities were assessed through evaluation of Environmental Aspect and Impact. For the estates, greenhouse gas emission was normally identified from emission of fossil fuels transport/machineries and use of fertilizer and pesticide/herbicide (refer indicator 4.5.3.1 and 4.5.3.2). The action plans to reduce identified significant pollutants and emissions has been established and implementation are on-going.</p>	Complied
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>All 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 others as follows;</p>	Complied

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Criterion / Indicator		Assessment Findings		Compliance
		Sources / Objective & Target	Action steps	
		Management of HCV river reserve and buffer zone conservation.	To train/retrain sprayers/manuring gang to avoid any chemical related work in this area.	
		To monitor Waste Management Plan for its appropriateness.	Schedule Waste disposal monitoring	
		To improve employees awareness on pollution prevention at housing complex including Zero Burning Policy.	Continuous reminders	
		To minimize spillage of chemical/oil onto ground.	Continuous training and use of spill trays	
		To review aspect identification and Impact evaluation to identify significant critical points for control.	Review EA/EIE	
		Maintenance of sentang trees.	Ensure signage and demarcation are visible to avoid chemical intervention. To monitor pollution/erosion.	

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.5.5: Natural water resources			
<p>4.5.5.1</p>	<p>The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <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>a. Kemaman Estate Complex has established and continue to use and update the water management plan as appropriate. Water management plan 2019 was sighted. The plan has included reduction plan, pollution prevention, maintenance and upkeep of field drain for irrigation. All estates assessed are committed to maintain the quality and availability of surface and ground water, among them as follows:</p> <ul style="list-style-type: none"> - For human consumption, drinking water is sourced from SATU, the Trengganu Drinking Water Supply Agency - Water needs by oil palm trees at estates are not irrigated but rain-fed. The estates at Kemaman complex are blessed with heavy rainfall, averaging 4000mm per annum in addition to evenly monthly distributed rainfall. Rainfall data are recorded daily to help planning, especially when drought occurs, and predicting oil palm yield levels. - For nursery operations water source are also from water ponds or river. <p>b. Monitoring of outgoing water at Tebak and Jernih Estates after manuring activity were verified by examining the latest (06.08.2019) Certificate of Analysis done by ERALab (KT) Sdn Bhd. Water analysis for inlet to field were also carried out.</p> <p>The test results showed the water quality were generally found good, with all the parameters monitored within Class I to IIB standards of the NWQSM.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>c. Harvesting of rain water was practised at estate operation i.e. water bodies area whereas in the field drain, collection drain and main drain was well maintained to collect rain water. Pruned palm oil fronds are heaped at interrows and soft grass allowed to grow to retain moisture and prevent nutrient washout.</p> <p>d. The riparian buffer zone along natural waterway were established. No chemical spraying within the 5 meter from river bank is allowed. Observed adequate maintaining and restoring appropriate riparian buffer zones at along all natural waterways within the estate. Training was given to sprayers and manurers on no chemical application at the prohibited areas of the buffer zone.</p> <p>e. Site visit has confirmed that riparian buffer was well maintained as per policy statement.</p> <p>f. It was confirmed that there was no bore well available at the assessed estates.</p>	
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	There was no construction of bunds, weirs and dams across main rivers or waterways passing through an estate. All waterways were keep naturally passing through the estates.	Complied
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). - Minor compliance -	Based on the site visit, it was observed that the estates have implemented rain water harvesting through construction of scupper drain, conservation terrace, sump pits, to name a few.	Complied
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value			

Criterion / Indicator	Assessment Findings	Compliance
<p>4.5.6.1 Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p> <ul style="list-style-type: none"> a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (<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>- Major compliance -</p>	<p>Identification of high biodiversity value habitats 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 which covers the three main components of identification, management and monitoring.</p>	<p>Complied</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> <ul style="list-style-type: none"> a) Ensuring that any legal requirements relating to the protection of the species are met. b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. <p>- Major compliance -</p>	<p>Endangered, rare and threatened species classified by IUCN was recorded in the report findings for the studies undertaken. 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>During field visit at Tebak Estate at Field 17A/18A there was evidence of elephant intrusion the previous night where more than 50 young palms were destroyed. Wildlife Department Trengganu had been informed. Close by the intruded area TDM Plantations had erected electric fencing to deter elephant intrusion.</p> <p>Animal sighting at all estates were recorded itemizing types and frequency of the animal being sighted by the workers in the field.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Remarks animals sighted in the book were either the animal itself, foot prints, feaces, hounds and sounds or damaged trees.</p> <p>No hunting, no fishing or collecting activities 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 practised by the estate include patrolling, tyre burning and electric fencing.</p>	
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 2019 was established. Activities such as:</p> <ul style="list-style-type: none"> - Policy training - Conservation of natural areas - Enhance the plantation landscape - Animal sighting records - e. Erect signage 	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>Commitment to zero burning is spelt out in the Biodiversity & Environment policy dated 1.9.2017 and adherence to it was evident during visits to replanting area in 2018 at Tebak Estate.</p> <p>Verified records of work programme for replanting at Tebak Estate and confirmed there was no use of fire for waste disposal and for land preparation.</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</p>	<p>Not applicable as there was no phyto-sanitation activities at the assessed estates to date. A normal land preparation practices were observed for replanting.</p>	Not applicable

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Criterion / Indicator		Assessment Findings	Compliance
	there is a significant risk of disease spread or continuation into the next crop. - Major 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 all sampled estates as there are no phyto-sanitation activities as todate. 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 -	Practice is guided by Replanting procedure which requires excavator to be used for directional felling. Felled trunks are shredded by using chipping bucket (modified sharp edge bucket) for across grain cutting of not more than 10 cm thickness at 45-60 deg angle of the trunk. Roots trunk (chips) are stacked underneath inside the trench, followed by shredded crown and the frond on top. A normal land preparation practices were observed for replanting.	Complied
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: <ul style="list-style-type: none"> - Internal audit by Sustainability Department - Agronomist visit in (April 2019) - CEO minimum 1x/yr - Internal PA visit 2x/yr 	Complied

Criterion / Indicator		Assessment Findings	Compliance										
		<ul style="list-style-type: none"> - 3rd party Plantation Advisory annual visit by Sime Darby Seeds and Agricultural Services Sdn Bhd - Quality FFB checks during loading FF using "Bunch Count Sheet" which shows good and unripe bunches - task supervision and satisfactory task completion reports to senior management 											
4.6.1.2	<p>Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.</p> <p>- Major compliance -</p>	<p>TDM has a management strategy for planting on slopes to minimise and control erosion and degradation of soils. The guidance made up from various slope as follows:</p> <table border="1"> <thead> <tr> <th>Slope (degrees)</th> <th>Terrace width (metres)</th> </tr> </thead> <tbody> <tr> <td><2°</td> <td>Straight planting</td> </tr> <tr> <td>2-5°</td> <td>Straight planting. Water conservation terraces at 32m interval</td> </tr> <tr> <td>6-15°</td> <td>5.00</td> </tr> <tr> <td>16-25°</td> <td>3.60</td> </tr> </tbody> </table> <p>Among the soil conservation measures implemented to prevent soil erosion and siltation were construction of terrace and cover crop planting i.e. <i>Mucuna bracteata</i> (MB)</p>	Slope (degrees)	Terrace width (metres)	<2°	Straight planting	2-5°	Straight planting. Water conservation terraces at 32m interval	6-15°	5.00	16-25°	3.60	Complied
Slope (degrees)	Terrace width (metres)												
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6-15°	5.00												
16-25°	3.60												
4.6.1.3	<p>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 stenciled at the palm trees and also displayed in signage at the boundary/corners of every fields. This is observed during the field visit in the estate.</p>	Complied										

Criterion / Indicator		Assessment Findings	Compliance												
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 -	Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains FFB yield, CPO, OER and KER, costs of production, etc.	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 -	<p>Replanting programs were available at all the visited estates with 5 years projection and reviewed annually.</p> <p>TDM Plantations have long range replanting programme until FY 2024. Replanting planned for the palm older than 25 years, non-performance field (yield) and ganoderma infected palm. Sighted TDM Plantations Group Estates replanting programme. Sample Jernih Estate as per below:</p> <table border="1"> <tr> <td>Year</td> <td>2020</td> <td>2021</td> <td>2022</td> <td>2023</td> <td>2024</td> </tr> <tr> <td>Area, ha</td> <td>221.24</td> <td>272.40</td> <td>nil</td> <td>nil</td> <td>nil</td> </tr> </table>	Year	2020	2021	2022	2023	2024	Area, ha	221.24	272.40	nil	nil	nil	Complied
Year	2020	2021	2022	2023	2024										
Area, ha	221.24	272.40	nil	nil	nil										
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	<p>Quality of planting materials has been given attention. They are mainly seedlings of AAR Hybrida and Yangambi.</p> <p>TDM Plantation has an annual operating budget for the calendar year 2019 until 2025 and 5 year's projections) 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 2019:</p> <table border="1"> <tr> <td>Tebak Estate</td> <td>Jernih Estate</td> </tr> </table>	Tebak Estate	Jernih Estate	Complied										
Tebak Estate	Jernih Estate														

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Criterion / Indicator		Assessment Findings		Compliance
	- Major compliance -	Road bridge and path	New Concrete bridge at 16A1,04A1	
		Assistant Manager's Bungalow and Workers Quarters (1x4)	Workers Quarters (1x4)	
		Upgrade clinic	TABIKA upgrding	
		Fertilizer trailer	Farm tractors and trailers	
		Vehicle – Toyota Hilux	Vehicle - van	
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 -	<p>TDM plantation monitored the estate performance against the targets. The estates performance is recorded in the monthly progress report. Details on the actual vs budget i.e. crop production, fixed and direct cost are shown therein. The management also provides variance report on the performance and reviewed monthly. The supervisory personnel maintained a daily cost sheet for the field operations.</p> <p>The Estate Managers sit monthly with the CEO reviewing performance, operational issues, financial positions.</p>		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 -	<p>The contractors have signed on the service agreement or Work Order Agreement prior to provide services. The agreement has detailed the pricing mechanism for the service offered. Sighted Work Order Agreement samples for Tebak Estate as following:</p> <ul style="list-style-type: none"> - Work Order Agreement # TB:001/2019; Date: 20/12/2018; Contractor: Hassan Bin Jusoh - Work Order Agreement # TB:002/2019; Date: 20/12/2018; Contractor: Hassan Bin Jusoh 		Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Samples for Jernih Estate:</p> <ul style="list-style-type: none"> - Work Order Agreement # IP:08/19; Date: 20/1/2019; Contractor: KPF Agro Properties Sdn. Bhd. <p>Samples for Air Putih Estate:</p> <ul style="list-style-type: none"> - Work Order Agreement # AP 051/19; Date: 1/7/2019; Contractor: Nozfa Trading - Work Order Agreement # AP 055/19; Date: 1/7/2019; Contractor: Wing Soon Excavating Works 	
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>The payment was made by Head Office after the mill has sent the invoice to Head Office. Interviewed with the contractors confirmed that the payment was made promptly.</p>	Complied
Criterion 4.6.4: Contractor			
4.6.4.1	<p>Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- Major compliance -</p>	<p>Tebak Estate provided MSPO information and documentation for engaged contractors via work agreement signed by the contractors prior to delivery of work items and/or services. Briefing to contractors together done by mill management to contractors during signing of <i>Perjanjian Pesanan Kerja</i> (Work Order Agreement) which included the provision for contractors to comply with legal requirements, MSPO requirements and authorization by the mill to audit the contractors from time to time on their compliance against all relevant requirements. The general MSPO briefing to all engaged contractors was conducted by the mill management on 2/7/2019 at Pelantoh Estate Training Room.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.6.4.2	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p>- Major compliance -</p>	<p>Evidence of agreed contracts with contractor provided by the estates as per following samples for Tebak Estate:</p> <ul style="list-style-type: none"> - Work Order Agreement # TB:001/2019; Date: 20/12/2018; Contractor: Hassan Bin Jusoh - Work Order Agreement # TB:002/2019; Date: 20/12/2018; Contractor: Hassan Bin Jusoh <p>Samples for Jernih Estate:</p> <ul style="list-style-type: none"> - Work Order Agreement # IP:08/19; Date: 20/1/2019; Contractor: KPF Agro Properties Sdn. Bhd. <p>Samples for Air Putih Estate:</p> <ul style="list-style-type: none"> - Work Order Agreement # AP 051/19; Date: 1/7/2019; Contractor: Nozfa Trading - Work Order Agreement # AP 055/19; Date: 1/7/2019; Contractor: Wing Soon Excavating Works 	Complied
4.6.4.3	<p>The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.</p> <p>- Minor compliance -</p>	<p>TDM Plantation Sdn Bhd has agreed for BSI auditors to verify the assessment through a physical inspection if required.</p>	Complied
4.6.4.4	<p>The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted.</p> <p>- Major compliance -</p>	<p>The contractor will issued the working chit for every work done on daily basis as stated in the contract agreement. During the month end, the contractor will issued the tax invoice to the company for all the work done to proceed for payment.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7 Principle 7: Development of new planting 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 -	On group level, policy for the implementation of MSPO established as TDM Berhad Sustainability Policy; approved by the BOD of TDM Directors dated 27/3/2018. For TDM Plantation Sdn. Bhd. (TDMP), an MSPO Policy has been established and authorized by the Chief Executive Officer dated 1/8/2017.	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 to continual Improvement 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 -	Internal audit for Kemaman POM was planned and conducted on 17/7/2019 as per report of KPOM Sustainability Audit dated 24/7/2019. Records of internal audit report and findings shown the internal audit able to determine the strong and weak points and potential area for further improvement. A total of 3 noncompliance and 8 observations were raised by the internal auditors in the internal audit.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	Internal audit procedure established as TDM Plantation Sdn. Bhd. KPOM MSPO Internal Audit Standard Operating Procedure; Date: 1/8/2017; Edition: TDMP/01; Rev.: TDMP-01/2017. Identified findings recorded in Sustainability Audit Non-Compliance Findings & Recommendations as well as Visual Inspections & Site Visit form as per sighted for the latest audit conducted on 17/7/2019. Sighted the Corrective Action Report on Non-compliance Findings on the analysis of nonconformity raised.	Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	Report of internal audit complete with corrective action was made available for review in the management review meeting to be conducted.	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 -	Management review conducted based on Management Review Standard Operating Procedure; Date: 1/8/2017; Edition: TDMP/01; Revision: TDMP-01/2017. Review meeting planned to be conducted at least annually with previous meeting was conducted on 23/9/2018. Next meeting scheduled to be conducted on November 2019.	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.	The mill established a Continuous Improvement Plan FY 2018/2019 dated February 2019 which based on consideration of main social and environmental impact as well as opportunities for	Complied

Criterion / Indicator	Assessment Findings	Compliance																	
<p>- Major compliance -</p>	<p>company. Amongst all, 2019 completed plan include the following samples:</p> <table border="1" data-bbox="1086 528 1854 1311"> <thead> <tr> <th data-bbox="1086 528 1245 592">Category</th> <th data-bbox="1245 528 1487 592">Issue</th> <th data-bbox="1487 528 1854 592">Plan</th> </tr> </thead> <tbody> <tr> <td data-bbox="1086 592 1245 1182" rowspan="5">Welfare/ Social</td> <td data-bbox="1245 592 1487 756">Location of workers housing too close to effluent ponds</td> <td data-bbox="1487 592 1854 756">Relocate to safer and better location</td> </tr> <tr> <td data-bbox="1245 756 1487 855">Insufficient workers housing</td> <td data-bbox="1487 756 1854 855">Additional housing construction</td> </tr> <tr> <td data-bbox="1245 855 1487 954">Bad road surface</td> <td data-bbox="1487 855 1854 954">Construction of Pro-base road</td> </tr> <tr> <td data-bbox="1245 954 1487 1086">Insufficient drinking water resources</td> <td data-bbox="1487 954 1854 1086">Install new water filtration system in workers rest room</td> </tr> <tr> <td data-bbox="1245 1086 1487 1182">Dirty drinking water in mill</td> <td data-bbox="1487 1086 1854 1182">Install new water filtration system</td> </tr> <tr> <td data-bbox="1086 1182 1245 1311">Operation/ Environmental</td> <td data-bbox="1245 1182 1487 1311">High water usage at ramp for cleaning</td> <td data-bbox="1487 1182 1854 1311">Front-end upgrading works</td> </tr> </tbody> </table>	Category	Issue	Plan	Welfare/ Social	Location of workers housing too close to effluent ponds	Relocate to safer and better location	Insufficient workers housing	Additional housing construction	Bad road surface	Construction of Pro-base road	Insufficient drinking water resources	Install new water filtration system in workers rest room	Dirty drinking water in mill	Install new water filtration system	Operation/ Environmental	High water usage at ramp for cleaning	Front-end upgrading works	
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Welfare/ Social	Location of workers housing too close to effluent ponds	Relocate to safer and better location																	
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Criterion / Indicator		Assessment Findings		Compliance
		Cleanliness problem at front end area	Front-end upgrading works	
		Overflow of effluent during heavy rain	Digging of 2 new ponds and rebuild of flatbeds	
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	TDM has plan to construct methane capture (biogas) plant for its POME treatment system in Kemaman POM. This system will be able to utilize the use of renewable energy further.		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 adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	Kemaman POM has maintained records of request and response, land titles, OSH plans and etc. relating to environmental and social issues, plans for pollution prevention, complaints and grievances records that make available upon request.		Complied
4.2.1.2	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.	As per Memorandum by Group Chief Executive Officer; Ref. # TDM/CC/01; Date: 8/4/2018 from Corporate Communication Department to Heads of Subsidiaries, Heads of Department and		Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	All Staff of TDM Berhad Group on Sustainability Policies for the new policies approved by the Board on 27/10/2011 as following: <ul style="list-style-type: none"> - Sustainability Policy - Environment & Biodiversity Policy - Social & Humanity Policy - Occupational safety & health Policy - Gender & Diversity Policy 	
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 developed a Communication Procedure with POM/ Estates and Flowchart to Handle Social Issue. Maximum 28 working days shall be taken to resolve the issues. All internal and external stakeholders were briefed on this procedure. Sample records of Communication With Stakeholders, STPOM shown latest communication records dated on 26/8/2018 by PIBG SK Fikri was sighted.	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 -	The Mill Manager was appointed as the management officials as per Letter of " <i>Perlantikan Sebagai Wakil Syarikat Bagi Mengendalikan Isu Sosial Dengan Pihak Luar Di Peringkat Ladang/Kilang</i> " from Group Senior Human Resource Manager; ref. # TDMP/HR/PSN-GEN/RSPO; dated 2/9/2014.	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.	Stakeholder list was developed where all the affected stakeholders were included into the list such as government authorities, local communities, contractors and supplier,	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>neighboring schools and etc. for the mill. Sampled records maintained as following:</p> <ul style="list-style-type: none"> - Register of stakeholders 2019 list - External communications letters received - Communication of workers and contractors form - DOE field citation records - DOSH visit books <p>Stakeholder meeting was conducted on 02/7/2019 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. Seen the meeting minutes and attendance list. No issue was raised during the meeting.</p>	
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>Procedures are controlled documents and controlled and updated by Kemaman POM (MSPO Traceability SOP, TDM/STPOM/01 dated 1/8/2017). These procedures are current and include all elements of the traceability for controlling the receipt, sale and dispatch of palm products.</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>Latest inspections was conducted on 4/8/2019 by appointed person in-charge on compliance with traceability system as per records of Kemaman POM Supply Chain & Traceability Audit Report dated on 8/8/2019. The inspections were based on the requirements of RSPO Supply Chain Certification Standard June</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		2017 and MSPO Supply Chain Certification Standard Oct 2019 as the reference.	
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	The Mill Compliance Executive, Mr. Wan Ahmad Amilin Wan Ngah was appointed as the person in-charge to implement and maintain traceability system. Interview with the Mill Manager confirmed his knowledge of the MSPO traceability requirements.	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	Records of storage maintained in the Mill Daily Process Report under the Total Stock and Bulk Storage Tank Measurement sections. Sighted records of report dated 30/8/2019 for stock on 29/8/2019 shown total CPO stock = 1,732.73 mt and PK stock = 145.00 mt. Sales and delivery section also included in the Mill Daily Process Report records shown total sales/delivered products as of 29/8/2019 i.e. CPO delivered = 31,722.89 mt and PK delivered = 7677.55 mt. Sample of delivery records maintained i.e. weighbridge tickets and delivery note sighted as following: <ul style="list-style-type: none"> - Product: CSPO; Weighbridge docket # S0095530; Delivery note # A2613; Date: 28/7/2019; Lorry # CCR8968; Net weight: 39,000.00 kg - Product: Kernel; Weighbridge docket # S0094685; Delivery note # 16518; Date: 30/6/2019; Lorry # TCA3247; Net weight: 47,320.00 kg 	Complied
4.3 Principle 3: Compliance to legal requirements			

Criterion / Indicator	Assessment Findings	Compliance	
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>TDM Kemaman POM continued to implement its compliance with legal requirements. Among the evidence of compliance verified were as following:</p> <ul style="list-style-type: none"> - DOE licence no. 004055, reference number, AS (B)T 31/152/000/001; licensing period: 1/7/19 – 30/6/20. Method of discharge: waterways (BOD3 limit @ 30oC is 100 mg/l. - Contravention of license application dated 29/5/19, ref: KPOM/JAS/004/2019, pending for resubmission of incomplete information (Professional Engineer @ PE drawing for stack, appendix B para 7 & 8). Status will be further verified in the next audit. - MPOB license: 500041904000 (validity period 1/4/2019 – 31/03/2019) for 384,000MT. - Energy commission license no: 2018/03203; serial no: 32404 (validity period 22/11/2018 – 21/11/2019) for 2,400 kW installation capacity. - There are 14 CFs belonged to the mill covering various equipment such as sterilizers, hoist and crane and boilers. Sample of CF checked are Boiler (PMD 12383, valid until 21/1/20); Boiler (TG PMD 232, valid until 21/1/20); Back Pressure Receiver (PMT 107391 valid until 16/6/20); Total of 16 CFs exempted for renewal. Latest UPV inspection was last carried out on 19/3/19. 	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance -	The management has established the procedure i.e. TDM Plantation Sdn. Bhd. <i>Prosidur Undang-undang dan Lain-lain</i> ; Date: 10/2/2019 to identify and maintain alertness of updates in legal and other requirements applicable to its operation.	Complied
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	List of applicable legal and other requirements was made available during the assessment and compiled in the Legal Register 2019. Documented procedure has been established and implemented; refer to SOP: Kemaman Palm Oil Mill: Procedure for Legal and Other Requirements dated November 2012. All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. Legal register dated 1/2/2019 is referred to.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. - Minor compliance -	Tracking system on any changes in the law been well implemented with regular notification by Head Office and regular updates from the DOE/DOSH website as well as from government gazette website. The latest updates such as Noise Exposure Regulation 2019 and Minimum Wages Order 2018. Latest MAPA/NUPW Circular no.14/2019 was communicated to all operating units.	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	Milling activities do not diminish the land use rights of other users. Ownership documents sighted i.e. State Title; Ownership # 6521; Lot #7663; Area: 58.7685 ha; District: Kuala Terengganu; Mukim Belara; Date: 18/11/1976; Owner: Perbadanan Memajukan Iktisad Negeri Terengganu; Leasing to: Kumpulan Ladang-ladang	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Terengganu Sdn. Bhd.; Period: 1/1/1973 – 31/12/2017. Sighted too the Management Agreement as following:</p> <ul style="list-style-type: none"> - Between Kumpulan Ladang-ladang Terengganu Sdn. Bhd. and TDM Plantation Sdn. Bhd. dated 20/7/2016 - Between TDM Plantation Sdn. Bhd. and TDM Berhad dated 20/7/2016 - Between Kumpulan Ladang-ladang Terengganu Sdn. Bhd. and TDM Berhad dated 1/9/2012 	
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>The Estates and Mill are on government lease land and they hold copies of Land Titles. Original land title document is kept at headoffice while a copy of it is available at estate’s office. There is no change in the land ownership since the last audit.</p> <p>The Kemaman POM does not have a copy of land title by itself but is located within Pelantoh Estate that has legal ownership of the land and is an Operating Unit of TDM Plantation Sdn Bhd.</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>The POM boundary in the Pelantoh Estate is well maintained and marked by perimeter fencing.</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>There is no land dispute in TDM Kemaman complex at the time of audit. The land belongs to TDM and land ownership documents verified.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -		
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 -	No any lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	No any lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	No any lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	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 -	Implementation was as per TDM Plantation Sdn. Bhd. Social Impact Assessment (SIA) Kompleks Kemaman; A report prepared by SRA Consultancy, Senawang, Negeri Sembilan for TDM dated November 2011 was made available during audit. Based on the assessment, action plan was established on annual basis as per sighted Management Plan & Progress On Social Impact	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Assessment; Review date: 21/2/2019. Sighted area of concerns including housing and infrastructure with social impact identified were poor facilities and infrastructure, housing not complying with legal requirement, poor waste dumpsite and etc. Progress of improvement plan shown most of the areas of concerns have been completed such as issues on poor drainage and septic tank system at line site while some were done continuously on annual basis for improvement plan such as construction of new workers quarters. Latest improvement plan also includes the proposal to upgrade existing store and dining hall in crèche and kindergarten (Tabika Kemas) in 2020.	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	A system for dealing with complaints and grievances were established and documented as a Flowchart on Handling Social Issue and Complaint/ Grievance Procedure. Any issue raised by stakeholders will be discuss within 2 weeks for the first meeting and issues to be resolved within 28 working days.	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 -	Based on the records of Complaint Logbooks in mill, it was verified that all complaints and action able to be resolved in effective, timely and appropriate manner. Verification of resolution signatures by Officer, Assistant Manager and Manager were sighted.	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 -	Complaint Logbook for Linesite Repair and Complaint/ Request form was established and implemented. No external stakeholders were recorded related on complaint and grievances.	Complied

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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>Interview with internal and external stakeholders during stakeholder consultation found that they were aware of the complaint procedure and they were briefed by the management during stakeholder meeting.</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>The complaint logbook/ complaint files that recorded complaints and solutions since at least January 2014 was maintained available to affected stakeholders upon 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>Contributions were made as part of Continuous Improvement Plan FY2018/2019 Review on 4/12/2018. Sighted contributions were made included following:</p> <ul style="list-style-type: none"> - Provision of van for transport of SK Padang Kubu student attending pre-UPSR examination programs in Marang, Terengganu; date: 23-24/8/2019 - Donation for SMK Seri Bandi PIBG as co-organizer for 2019 school athletics program; date: 25/4/2019 - Donation for SK Kampung Fikri PIBG as co-organizer for school children learning tour program to Cameron Highlands; date: 1-2/3/2019 - Provision of vans for transport of the Pertubuhan Cakna Anak Yatim Kemaman orphans programs on 6/5/2019 	Complied

Criterion / Indicator		Assessment Findings	Compliance															
Criterion 4.4.4: Employees safety and health																		
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. - Major compliance -	TDM Plantation Sdn Bhd has established, implemented and maintained its Occupational, Safety & Health Policy dated 1/9/2017, signed by CEO, Mr Jailani Bin Che Kar. It is seen communicated by displaying hard copy at notice boards and also through MSPO Policy and its subsidiary policies briefing. OHS plan for 2019 has been developed to cover all activities involved at the mill. Please see indicator 4.4.4.2 below for details.	Complied															
4.4.4.2	The occupational safety and health plan should cover the following: 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: 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	a) The OSH Plan covers briefing on MSPO Policy including informing OSH Policy to all employees and contractors and repeat same during Induction Program for new hires and new contractors. b) Risk of mill operations have been assessed as per procedure dated 1 August 2018 edition: TDMP/01 Revision: TDMP – 01/2018 and documented in Hazard Identification, Risk Assessment and Risk Control (HIRARC) Register. The register was last reviewed on 01/02/2019. Activities assessed include but not limited to the following work stations: <table border="0" style="width: 100%;"> <tr> <td>Weighbridge</td> <td>Clarification</td> <td>Workshop</td> </tr> <tr> <td>Ramp</td> <td>Nut cracker</td> <td>Laboratory</td> </tr> <tr> <td>Sterilizer</td> <td>Kernel plant</td> <td>Water Treatment Plant</td> </tr> <tr> <td>Thresher</td> <td>Kernel storage</td> <td>Effluent Pond</td> </tr> <tr> <td>Press</td> <td>CPO storage</td> <td>Security</td> </tr> </table>	Weighbridge	Clarification	Workshop	Ramp	Nut cracker	Laboratory	Sterilizer	Kernel plant	Water Treatment Plant	Thresher	Kernel storage	Effluent Pond	Press	CPO storage	Security	Major non-compliance
Weighbridge	Clarification	Workshop																
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Criterion / Indicator	Assessment Findings	Compliance
<p>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.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</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 ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>Nonetheless, the risk assessment conducted had missed out Bio-compost Plant. Thus, a Major NC has been raised.</p> <p>External expertise required to conduct Chemical Health Risk Assessment (CHRA) had been effected on 17/05/2015 by engaging competent assessor Registration No. JKPP HIE 127/1-2(259). Recommended action by the Assessor as in the case Medical Surveillance for welders at workshop and Laboratory Assistant exposed to N-hexane were followed.</p> <p>c) Awareness and training program had been carried out including safe working practices. The objective was to ensure all workers involved in handling chemicals have been adequately trained and understood the dangers the chemicals posed. The emphasis of training is on safety, health and environmental risks of chemicals exposure as well as risk recognition of acute and long-term exposure symptom. Reference to information in Chemical Safety Data Sheet was used as well as PPE demonstration on the importance for donning PPE correctly.</p> <p>d) Records of PPE issued and acknowledgement of receipt are maintained individually for all category of workers. The PPE issued are free of charge.</p> <p>Sighted common PPE issued include safety helmets, safety shoes, gloves and safety glass. Sighted PPE record last entry was on 28.5.2019. In addition to basic PPE, special PPE are also provided for workers assigned to dangerous operation such as work at height, high noise area and in confined space.</p>	

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	<p>During site visit the staff/workers were noted to wear their proper attire & PPE given.</p> <p>e) SOP for Chemical Management dated 01/09/2017, Edition TDM/01, Rev. TDMP 01-2017 for handling and storage of chemicals is available. Therein the procedure contains the following;</p> <ul style="list-style-type: none"> - A trained person to handle chemicals - Hazardous chemicals stored in areas design with adequate ventilation, spill control and fire protection systems in addition to SDS present at point of use. - Stores locked and access only by authorised personnel. - PPE adherence during such an activity - Handlings details before and after are provided. - Establishment of emergency situation procedures <p>f) The person in-charge for overall safety and health at TDM Plantations Sdn Bhd is the HQ Safety & Health Officer, DOSH Registration No. HQ/16/SHO/01/00345 appointed effective 01/01/2015. At Operating Unit level he is supported by site Compliance Executive (Wan Ahmad Amilin Wan Ngah, appointed on 17/92/2019) and the OHS Committee.</p> <p>g) Safety & Health Committee has been established as sighted in the 2019 OSH Committee Organization Chart. To comply with OSH (Safety & Health Committee) Regulations 1996, the mill conduct a three monthly meeting as documented in the last four quarters Meeting Minutes as follows: 25/09/2018, 19/12/2018, 19/03/2019 and 18/06/2019.</p>	

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Criterion / Indicator	Assessment Findings	Compliance
		<p>Viewing the minutes, the meeting had discussed issues related to employees' safety, health and welfare to improve conditions on the job and develop strategies to make the work environment safe and healthy. Unsafe or unhealthy work conditions needing corrective action were acted.</p> <p>All records of meeting are kept and maintained.</p> <p>h) Accident and emergency procedures dated 01/01/2018 Edition: TDM/01, Rev. TDMP 01/2018 is available and it had been briefed to staff, workers, contractors and visitors should do in an emergency. They understood as the Accident and Emergency Procedures guide them to respond to identified credible emergency scenarios that could happen at the mill. It is for a safe and orderly evacuation while the Emergency Response Team (ERT) deal to overcome and normalize the issue at hand.</p> <p>Annual emergency fire drill and evacuation had been organized to test the preparedness of the Emergency Response Team and workers and identify their strengths and weaknesses. ERT and First Aid training was conducted in May 2019.</p> <p>i) There are adequate trained First Aiders at the mill with the addition of three employees from office staff and mill work station operators (day and night shift) who had attended Basic First Aid Training on 9 & 10 January 2019 given by external training provider at TDM Akademi, Sg. Tong, Terengganu.</p> <p>First aid boxes were noted made available at various work stations including office, workshop and guard house. Inspection</p>

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Criterion / Indicator		Assessment Findings	Compliance
		<p>of the First Aid boxes showed its contents were up-to-date as it was check and replenish monthly by the Estate Hospital Assistant.</p> <p>j) Records on all accidents had been verified to be maintained satisfactorily. Quarterly review on accident cases had been carried out during quarterly OSH Committee meeting.</p> <p>As required by OSH (NADOPOD) Regulations 2004 JKPP 8 Form had been submitted to DOSH on 27/01/2019.</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 developed Human Rights Policy dated 1/6/2017 and Social Policy dated 1/6/2017 which signed by CEO. Briefing of the policies were provided to the workers on 20/8/2017. The policies were displayed at the notice board outside the office.</p>	Complied
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 Human Rights Policy dated 1/6/2017 and Social Policy dated 1/6/2017 which signed by CEO. These policies have stated that the management was committed to treat everyone equally without any discrimination and provide equal opportunities regardless of race, nationality, gender and etc. Interviewed with workers confirmed that no discrimination was practice by the management. Briefing of the policies were provided to the workers on 20/8/2019. The policies were displayed at the notice board outside the office.</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.</p>	<p>The management have ensured that employees' pay and conditions meet applicable legal requirements i.e. National</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>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>Minimum Wages Order 2018. Sighted payslips for following samples:</p> <ul style="list-style-type: none"> - Employee ID: KM00018; Div. G02 (Gang 2); Oil Room Operator; Date join: 20/8/1997 - Employee ID: KM00018; Div. G01 (Gang 1); General; Date join: 2/6/2002 - Employee ID: KM0900131; Div. G02 (Gang 2); Press Operator; Date join: 1/5/2009 - Employee ID: KM1800210; Div. G01 (Gang 1); General; Date join: 1/8/2018 <p>All samples shown employees received minimum wages as per legal requirements.</p>	
<p>4.4.5.4 Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>Management ensured employees of contractors are paid based on legal standards as per MAPA Circular No. 44/2018; Date: 29/11/2018 which referring to the Minimum Wages Order (Amendment) 2018 that would come into operation on 1/1/2019.</p>	Complied
<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>Records of employee analysis summary containing information of full names, gender, date of birth, start work date, job description, wages and employee personal ID sighted available for the latest updated as of 31/8/2019.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>Fair contracts have been signed by both employee and employer with both kept a copy each. Sample contract sighted as following:</p> <p><i>Tawaran Bekerja Secara Kontrak; Tempoh: 1/8/2018 – 31/12/2018; Letter ref. # KL-KKS/3/06.44; Date: 25/7/2018; Azhar Mansor; on statement "Tuan tidak tertakluk kepada sebarang perjanjian MAPA/NUPW" – no EPF deduction (due to short term contract)</i></p>	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p>- Major compliance -</p>	<p>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>	Complied
4.4.5.8	<p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p> <p>- Major compliance -</p>	<p>Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to the Employment Act 1955.</p> <p>As at current status, there was none has crossed 80 hours of overtime. Verified the payslips, the payment and calculation of overt time well distributed.</p> <p>The overtime rate after 8 hours daily rated is as following:</p> <ul style="list-style-type: none"> - Sun - Thu – daily rated / 8 hours x 1.5 - Friday - daily rated / 8 hours x 2.0 - Public holiday – daily rated / 8 hours x 3.0 	Complied

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>Wages and overtime payment documented found consistent with legal regulations and collective agreements as per sample sighted in indicator 4.4.5.3 above.</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>Other forms of social benefits for workers including the insurance as following:</p> <ul style="list-style-type: none"> - Local workers & staff: Social Security Organization (SOCSO) Monthly Contribution sighted as per sample latest Form 8A; for the monthly contribution for the month of November 2018 - Foreign workers: Foreign Workers Compensation Scheme Policy; 	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 and visit to the housing area/line site showed quarters are decently habitable and equipped with basic amenities of free electricity and water supply including other facilities such as mosque, community hall, sundry store, canteen, children’s crèche and football field.</p> <p>However, non-authorized additional construction and extension or renovation of company’s house shall be observed.</p>	OFI
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 and Reproductive Policy dated 1/6/2017 which signed by CEO. The management will ensure the workplace and surrounding are free from any types of harassment included ethnic harassment, religious, gender, country of origin and etc. They will ensure that the rights of women will be protected.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>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.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has developed Gender Policy and Reproductive Policy dated 1/6/2017 which signed by CEO. The management will ensure the workplace and surrounding are free from any types of harassment included ethnic harassment, religious, gender, country of origin and etc. They will ensure that the rights of women will be protected.</p> <p>Sighted the latest employee representative meeting as per records of minutes of meeting for trade union # 01/2019 dated on 2/7/2019.</p>	<p>Complied</p>
<p>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.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has developed Child Protection Policy dated 1/6/2017 which signed by CEO. The company will not recruit or exploit any individual less than 16 years old to work in the company. Seen the employee master list confirmed that all the workers were above 18 years old. Besides, interviewed with workers and stakeholders confirmed that TDM Plantation Sdn Bhd did not recruit any workers less than 18 years old.</p>	<p>Complied</p>
<p>Criterion 4.4.6: Training and competency</p>		
<p>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.</p> <p>- Major compliance -</p>	<p>Kemaman POM has established an annual training program for 2019 that covers all aspects of the MSPO Principles and Criteria. The training needs and program was made available for verification.</p> <p>All related workers & contractors were appropriately trained with proper training programs. The training program has included regular assessment of training needs by work station (Electrical,</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		<p>Environment, Office, Production, Boilers, Grading, QAQC, Engine Room, Security).</p> <p>There were also additional subjects including the mill operating procedures, parameters of mill produce, machinery maintenance etc. The training program specified the target group to be trained under the allocated subjects.</p> <p>Following the training given, regular assessment of training was conducted either by the Trainer or their immediate Supervisor to gauge trainees' understanding. Else, refresher course will be organized.</p> <p>Records of training were sighted during this audit. Details are shown in 4.4.6.3.</p>	
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>Formal training program for the year 2019 was published and made available at beginning of Year and implemented accordingly. Training identification and needs analysis were applied to recognize the staff, workers and contractor's deficient skills or knowledge gaps, particularly, with respect to their job description. Training was then organized and delivered by Internal staff choosing from the published training programs established.</p> <p>The details of the training needs include categories of stations, subjects, and employees' group. Included in this program among others are subjects related to;</p> <ul style="list-style-type: none"> - Environmental/safety & health policy/scheduled waste management / environmental responsibility, - Sustainability practices and guidelines 	OFI

Criterion / Indicator		Assessment Findings	Compliance																																	
		<ul style="list-style-type: none"> - Good mill practices - stations operations/control of process parameters - Social program and other welfare activities. <p>Training methodology given to workers are commonly On-The-Job Training, Coaching/Mentoring and Hands-on Practical Session with plenty of Graphical/Pictorial illustration than wordings as these approach get their attention and better understanding.</p>																																		
4.4.6.3	<p>A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	<p>Continuous training programs are established, implemented and reviewed annually. As per record of Continuous Training, the following training / refresher training were sighted developed:</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Date</th> <th>Course Name</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>9-10.01.19</td> <td>Latihan Kompetensi First Aider</td> </tr> <tr> <td>2</td> <td>14.03.2019</td> <td>Latihan dan Penerangan Berkenaan Keselamatan dan Kesehatan Pekerja</td> </tr> <tr> <td>3</td> <td>20.03.2019</td> <td>Kemalangan Di Tempat Kerja</td> </tr> <tr> <td>4</td> <td>27.03.2019</td> <td>Punca-punca Kepada Kemalangan Di Tempat Kerja @ Bengkel</td> </tr> <tr> <td>5</td> <td>22.04.2019</td> <td>Latihan Cara Masuk Fiber Ke Dalam Boiler Semasa Operasi</td> </tr> <tr> <td>6</td> <td>15.05.2019</td> <td>Inspection and Testing of Engineering Control Equipment</td> </tr> <tr> <td>7</td> <td>21.03.2019</td> <td>Taklimat "Ruang Terkurung"</td> </tr> <tr> <td>8</td> <td>21.03.2019</td> <td>Peranan dan Tugas Makmal Di Kilang Kelapa Sawit (Pengendalian Bahan Kimia n-Hexane)</td> </tr> <tr> <td>9</td> <td>10.07.2019</td> <td>Taklimat Penerangan Tentang HIRARC</td> </tr> <tr> <td>10</td> <td>10.07.2019</td> <td>Laporan Temubual Pekerja dan Presentation Mengenai Hearing impairment dan Temporary STS dengan Doktor OHD dari Syarikat SI Energy Enterprise</td> </tr> </tbody> </table>	No.	Date	Course Name	1	9-10.01.19	Latihan Kompetensi First Aider	2	14.03.2019	Latihan dan Penerangan Berkenaan Keselamatan dan Kesehatan Pekerja	3	20.03.2019	Kemalangan Di Tempat Kerja	4	27.03.2019	Punca-punca Kepada Kemalangan Di Tempat Kerja @ Bengkel	5	22.04.2019	Latihan Cara Masuk Fiber Ke Dalam Boiler Semasa Operasi	6	15.05.2019	Inspection and Testing of Engineering Control Equipment	7	21.03.2019	Taklimat "Ruang Terkurung"	8	21.03.2019	Peranan dan Tugas Makmal Di Kilang Kelapa Sawit (Pengendalian Bahan Kimia n-Hexane)	9	10.07.2019	Taklimat Penerangan Tentang HIRARC	10	10.07.2019	Laporan Temubual Pekerja dan Presentation Mengenai Hearing impairment dan Temporary STS dengan Doktor OHD dari Syarikat SI Energy Enterprise	Complied
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Criterion / Indicator		Assessment Findings			Compliance
		11	22.07.2019	Keselamatan Di Dalam Bengkel – Aspek Keselamatan dan Penggunaan Elektrik	
		12	23.07.2019	Latihan Kecemasan dan Kebakaran	
		13	23.07.2019	Latihan Kecemasan dan Kebakaran	
		14	08.08.2019	Latihan Plan Kecemasan Berkenaan Janakuasa	
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services					
Criterion 4.5.1: Environmental Management Plan					
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance -	TDM Plantations Sdn Bhd has established and Kemaman the Company's Biodiversity & Environmental Policy that includes protecting the environment and complying to existing laws. The Policy was signed by Chief Executive Director on 1 st September 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 -	<p>The Kemaman POM has developed its Environmental Management Plan and Continual Improvement Plan based on Environmental Aspect and Impact Identification (EAI) 2017 (date: 1 May 2011; TDM/KPOM/01 rev. KPOM-01-2011) exercise related to its activities, products and services. All significant impacts have been determined and mitigation plan was developed thereafter. They are guided by the TDM Environmental Policy to achieve desired environmental outcomes.</p> <p>The Plan covered environmental issues recognized from the Aspect Impact Identification exercise and subsequent actions required, that is, set objectives, target, programs/mitigation measures, action PIC, time frame and status in a tabulated form. In short, the Plan is to ensure that undue or reasonably avoidable</p>			Major noncompliance

Criterion / Indicator		Assessment Findings				Compliance															
		<p>adverse impacts of operations are prevented and positive benefits are enhanced.</p> <p>Although mill Environmental Aspect Impact Register was last reviewed on 3.2.2019, verification of the assessment showed that activities in the mill that could interact with the environment were not comprehensively assessed. Found that it had not included environmental risk as evidence of oil spill at Lubricant Store and old shaping machine was sighted. Hence, a Non-conformity report has been issued.</p>																			
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p>- Major compliance -</p>	<p>Forming part of Continuous Improvement Plan (updated February 2019) KPOM had included the mitigation measures for action taken by management in mitigating any negative impacts and to promote the positive ones as well as monitoring program to progressively monitor the action plan.</p> <table border="1"> <thead> <tr> <th></th> <th>Issue Item</th> <th>Plan</th> <th>Positive Impacts</th> <th>Timeline</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>GHG Emission</td> <td>To build a new Biogas Plant and capture the green house gas for other uses</td> <td>Reduce methane gas released by ponds and convert</td> <td>Dec 2019</td> </tr> <tr> <td>2</td> <td>Legal – EQA (Clean Air) Regulations 2014</td> <td>To install (ESP) Electrostatic Precipitator</td> <td>Reduction in green house gas emissions into the atmosphere</td> <td>Dec 2019</td> </tr> </tbody> </table>					Issue Item	Plan	Positive Impacts	Timeline	1	GHG Emission	To build a new Biogas Plant and capture the green house gas for other uses	Reduce methane gas released by ponds and convert	Dec 2019	2	Legal – EQA (Clean Air) Regulations 2014	To install (ESP) Electrostatic Precipitator	Reduction in green house gas emissions into the atmosphere	Dec 2019	Complied
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Criterion / Indicator		Assessment Findings				Compliance	
		3	Overflow of Effluent when heavy rain occurs	To dig 2 new ponds and rebuild flat beds	No leakage of effluent into local rivers	Completed	
		4	Empty Fruit Bunch	Send EFB to own estates for application as manure in the field (Nutrient recycle).	Waste is converted into fertilizer and reduce dependence on chemical fertilizers.	On-going	
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	<p>The mill had identified new methods in improving the BOD level <100 mg/l for the water discharge. Under the improvement plan the mill had the following plan in relation to the effluent management improvement.</p> <ul style="list-style-type: none"> - Biogas plant – reduction in GHG into the atmosphere - Effluent pond system – to remove solid content in cooling pond under desludging program - Geotube installation – reduce solid loadings in pond and improve effluent system - Construction of 2 new effluent ponds – avoid effluent overflow into river 				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 -	<p>Awareness and training on Environmental Policy, Objectives and Environmental Management and Improvement Plan was given to employees in many ways such as training, open discussion during morning muster and incorporation with other meeting like OSH</p>				Complied	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Committee meeting and Environmental Performance Management Committee meeting.</p> <p>Auditor interviews with boiler-man revealed that they were aware no black smoke emission was allowed as this pollute the air and the mixing ratio of fiber to shell must be monitored. Workshop maintenance operators were aware of waste chemical containers, used and chemical-contaminated cotton and rags, contaminated soil, debris or matter resulting from cleaning-up of a spilled chemical, mineral oil or scheduled wastes, spent hydraulic oil, spent lubricant, used batteries and waste electrical and electronic parts shall be disposed as scheduled waste, inventoried and stored at the designated Scheduled Waste Storage area. These waste according to them can pollute that land and water. All these according to them is to meet the Biodiversity & Environmental Policy commitment to legal compliance and reduce pollution.</p> <p>3R waste bins were seen made available at strategic locations of the mill. Inspection of the bins showed they were being used and there was no mixing of waste noted indicating the training given and implementation were effective.</p>	
4.5.1.6	<p>The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.</p> <p>- Major compliance -</p>	<p>The is made possible through the Environmental Performance Monitoring Committee (EPMC) Meeting held quarterly. The dates held were sampled: 20/12/18, 14/03/19, 12/06/19.</p> <p>The agenda discussed comprised of the following issues;</p> <ul style="list-style-type: none"> - Objectives & Program Sustainable Environment - Legal Compliance - Environmental Control Equipment 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Defects Report (Effluent, Scheduled Waste & Boiler) - Training and Competency - Any other business <p>The key purpose of EPMC is to ensure optimal operation of Pollution Control Systems (PCSs)-- environmental monitoring tools - prevention of PCSs failure and systematic management of performance monitoring data and improved regulatory compliance on a sustained basis.</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 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>Direct usage of diesel for the mill operations are recorded to monitor optimization of diesel consumption. The quantity in liters is divided over the mt FFB processed (ratio) during the month. The performance is measured by this ratio to indicate the level of performance. The data is compiled for comparison and control for future improvement with aim of gradual reduction of diesel and more reliance on renewable energy (shell and fiber) use. There were measures as shown in the energy management plan to reduce and eliminate wastages among others as follows;</p> <ul style="list-style-type: none"> - To ensure optimum FFB ramp balance to commence processing - Timely servicing of vehicles to ensure efficient use of diesel & avoid leakages - Regular servicing of turbine for a better efficiency and to minimise running of gen-set - Educate employees on fuel saving practices. 	Complied

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Criterion / Indicator		Assessment Findings				Compliance
		Month 2019	Diesel used/L	FFB processed /mt	Diesel/FFB	
		Jan	15,703	23,588.91	0.67	
		Feb	14,297	20,109.52	0.71	
		Mac	16.545	18,414.36	0.90	
		April	13,031	19,700.87	0.66	
		May	14,549	19,837.75	0.73	
		June	13,680	18,005.46	0.76	
		July	17,164	18,258.89	0.94	
		Aug				
		Sept				
		Oct				
		<p>The mill recorded a range of 0.66 to highest 0.94 for the entire 7 months YTD 2019</p> <p>Power production and allocation to the mill machinery and complex generated by steam turbine tabulated for the year 2018. It is calculated as electricity generated from turbine that produces power for the mill entire complex operation unit in kwh/mt CPO.</p>				
		Month 2019	Electricity generated (kwj)	CPO produced /mt	Kwj/mt CPO	
		Jan	311,632	4,450.77	70.02	
		Feb	38,6000	4117.93	57.94	
		Mac	151,500	3,907.10	38.78	
		April	288,250	4,049.81	71.18	
		May	167,340	4,177.26	40.06	
		June	131,870	3,757.48	35.10	

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Criterion / Indicator		Assessment Findings				Compliance
		July	160,250	3,836.10	41.77	
		Aug				
		Sept				
		Oct				
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 POM has estimation on total energy required. This estimation was compared to the actual usage by month and reported to the head office for monitoring.</p> <p>The mill records the following data and tabulated the ratio against the CPO produced to determine the efficiency of their operations;</p> <ul style="list-style-type: none"> - all the diesel used (non-renewable) for the mill operations - fibre/shell (renewable) <p>In this relation the following data were sighted and verified.</p> <ul style="list-style-type: none"> - Non-renewable energy usage YTD 2019 for month of January 2019 – July 2019. - Renewable energy usage YTD 2019 for month of January 2019 - July 2019 				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. EFB is used in the estates for mulching. Details of renewable energy fibre/shell utilization are recorded.</p>				Complied
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>Generally, the identification of waste products was done through EAI evaluation as mentioned in Indicator 4.5.1.2. They are documented in Waste Generation/Inventory Record and Waste</p>				Complied

Criterion / Indicator		Assessment Findings	Compliance								
	<p>- Major compliance -</p>	<p>Management Plan. Scheduled Waste Disposal is reported to DOE eSwiss on-line. The waste generated from the mill operations are as shown below:</p> <ul style="list-style-type: none"> - Domestic waste – rubbish from the mill complex and employee’s quarters (disposed by estate management) - Recycled waste – Organic biomass waste (POME, Empty Fruit Bunch, Fibre, palm kernel shell, boiler ash and decanter cake), scrap iron and tyres - Scheduled waste – Chemical waste (Spent IPA, hexane, lubricants, hydraulic oil, grease), oil filter, used batteries, oil/chemical containers, contaminated rags <p>The source of mill pollution generated from the mill is the smoke and particulate matters from the boiler are monitored from the stack emission during the entire operations. These reports are reviewed by the mill and submitted to DOE</p>									
<p>4.5.3.2</p>	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <ol style="list-style-type: none"> 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>- Major compliance -</p>	<p>The Waste Management Plan listed the waste generated from the mill operations among others are listed below;</p> <table border="1"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Description / Location</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Industrial waste</td> <td>EFB <i>Threshing Station</i></td> <td>Sent for mulching in the estates. To ensure and submit EFB disposal schedule and location every month To dispose EFB within 14 days upon storage To ensure no open burning activity on EFB and mill waste</td> </tr> </tbody> </table>		Type of waste	Description / Location	Action to be taken	1	Industrial waste	EFB <i>Threshing Station</i>	Sent for mulching in the estates. To ensure and submit EFB disposal schedule and location every month To dispose EFB within 14 days upon storage To ensure no open burning activity on EFB and mill waste	<p>Complied</p>
	Type of waste	Description / Location	Action to be taken								
1	Industrial waste	EFB <i>Threshing Station</i>	Sent for mulching in the estates. To ensure and submit EFB disposal schedule and location every month To dispose EFB within 14 days upon storage To ensure no open burning activity on EFB and mill waste								

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Criterion / Indicator		Assessment Findings		Compliance
			<p>To design EFB storage area in ensuring no spillage of leachate into monsoon drain.</p> <p>Scrap iron <i>Scrap yard near Workshop</i></p> <p>POME <i>Liquid POME at effluent pond and solid POME in Geo-tube</i></p> <p>Boiler ash <i>Boiler</i></p>	
		2	<p>Scheduled Waste SW305/306/102/410/109 SW409/410/322/429 <i>Mechanical/electrical</i></p> <p>Clean and tidy storage area Separation of type SW using labels 10cm x 10cm To ensure spillage trap functions effectively Monthly stock verification by executives</p>	

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Criterion / Indicator		Assessment Findings			Compliance
			<i>workshop, chemical store, schedule waste store</i>	Ensure inventory not exceeding 180 days / 20 mt Follow approved consignment note and update in ESWIS Provide training to the SW handlers.	
		3	Domestic Waste <i>Office, line site</i>	Disposal made 3x /week for both mill/estate on a different day. Encourage recycling program currently maintained by an assigned employee. Disposal to Local Municipal Council landfill. Provide adequate dustbins line sites /office complex Weekly inspection by MA/executives Awareness on hygiene.	
			Sewage <i>Office, labor quarters</i>	Provide adequate washrooms/toilets at mill and line sites To ensure employees' quarters equipped with appropriate septic tank Cleaning/desludging septic tank done by appointed contractor.	
4.5.3.3	The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005 - Major compliance -	The SOP Scheduled Waste (Edition TDMP-02, Rev TDMP-02/2017) for handling used chemicals has been established and documented. Therein the procedure described the requirements in Labeling, Legal requirement, Waste generator, Training required, DOE license much in line with the DOE Guidelines For Packaging, Labelling And Storage Of Scheduled Wastes. Labels were sighted affixed properly on the container of SW inclusive of required details at the SW Store. Inventory records were available and disposal of SW verified not exceeding 180			Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>days or 20mt, through DOE registered contractor, Pentas Flora and 3R Quest and KPOM use DOE eSwis on line system to notify disposal.</p> <p>Based on interviews with the workers, their understandings on proper handling, storage and disposal of wastes were satisfactory.</p>	
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>Disposal of domestic wastes is through landfill. TDM SOP June 2017; section B8: Guidance for establishing landfill within the estate states landfill site to be situated 3 km far from the watercourse and residential area. Waste is collected 3x /week from line site.</p> <p>Recyclable wastes such as plastic bottles, aluminium cans and paper are disposed through 3rd party contractor.</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 done by the mill of all polluting activities from the Environment Aspect and Impact exercise, identified sources were SW, boiler chimney (particulate and soot) & POME treatment/anaerobic process as the main GHG pollutants.</p> <p>Current monitoring was through online boiler smoke density and alarm and quarterly boiler stack monitoring of dust particulate. Other environmental assessment carried out as per Action Plan for Environmental Assessment 2019 and Continuous Improvement Plan established, see Indicator 4.5.1.3 and 4.5.1.4 above.</p>	Complied
4.5.4.2	An action plan to reduce identified significant pollutants and	All identified issues have significant impacts to the environment.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	emissions shall be established and implemented. - Major compliance -	Thus, action plan to reduce the identified significant pollutants and emissions was documented in the 2019 Continuous Improvement Plan, mostly carryover projects from 2018. The strategy to mitigate the GHG emission from (a) boiler is to complete installation of Electrostatic Precipitator by end 2019, and (b) construction of Biogas Plant to generate energy utilizing methane (GHG) capture from effluent pond. All above efforts and action plan is adequate to comply with DOE legal requirements.	
4.5.4.3	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. - Major compliance -	Palm Oil Mill Effluent (POME) is treated through anaerobic pond treatment system. The treated effluent is regularly monitored to comply to discharge limit Biochemical Oxygen Demand (BOD) for water course not exceeding 100 mg/l as prescribed in the " <i>Jadual Pematuhan</i> " license issued to the mill. Regular monitoring was conducted by the mill by taking the sample of waste water at final discharge point before entering the river and its results were discussed at EPMC meeting. Effluent final discharge was analysed on monthly basis by accredited 3rd party laboratory (Makmal Analisa Bukit Goh, FGV). Reports for the effluent parameters were submitted to DOE using " <i>Borang Penyata Suku Tahun</i> " for compliance. Sighted the effluent results in the laboratory at random and all parameters comply to the DOE requirement. (Units in mg/l except for PH)	Complied
Criterion 4.5.5: Natural water resources			

Criterion / Indicator	Assessment Findings	Compliance
<p>4.5.5.1 The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p>	<p>The mill has established a 2019 Water Management Plan, reviewed on February 2019. The plan incorporate the following programs:</p> <ul style="list-style-type: none"> - Water reduction - to use rain water harvesting for cleaning, chemical mixture and others. - Safety and Health - to provide clean drinking water by installing new water filtration system - Environmental <ul style="list-style-type: none"> • to ensure no leakage or overflow of effluent into local rivers during heavy rain by digging 2 new ponds and rebuild the flatbeds. • to keep smooth and unobstructed flow of rain water drainage around the mill compound through repair and renew damage monsoon drains around mill compound. • to repair and improve drainage system at oil room to avoid the drains from blockage and clogging • to install flowmeter to monitor efficiency of drainage to effluent ponds • to perform water analysis to check monsoon drain water discharge quality once a year, that is, to monitor pollutants from mill escape. - Safety /Social <ul style="list-style-type: none"> • to identify water sources as contingency plan during water shortage, example, drought • to purchase water from SATU (Terengganu Water Company) • to obtain water supply from nearby estates • to train staff/workers to save water usage 	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
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>Details of effluent treatment and report as provided in 4.5.4.3 above.</p> <p>The effluent is retained for treatment in a flow series through several / multiple stage ponds before being discharged into the watercourse and land application. The compliance requirement provided in the DOE '<i>Jadual Pematuhar</i>' license is BOD <100 mg/l for final water discharge. Under the improvement plan the mill had the flowing plan in relation to the effluent management improvement.</p> <ul style="list-style-type: none"> - Biogas plant – reduction in GHG into the atmosphere - Polishing plant – to comply to reduce BOD to 20 ppm for water discharge. - Effluent pond system – to remove solid content in cooling pond under desludging program. 	Complied
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>At Kemaman POM, the Standard Operating Procedure & Operation Manual updated on November 2012 (TDM/KPOM/01 dated 1 May 2011) is available as a guidance document to operate the mill. There were total of 25 SOPs been established and documented.</p> <p>For SCCS implementation, RSPO Supply Chain Standard Operating Procedure – Identity Preserved and Mass Balance Module, TDM/MILLS/02 rev:01/2018 dated 1/7/18 is referred to.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.6.1.2	<p>All palm oil mills shall implement best practices.</p> <p>- Major compliance -</p>	<p>The following reports are established to monitor the mill operations</p> <ul style="list-style-type: none"> - Daily production report - Progress report <ul style="list-style-type: none"> • FFB quality / Extraction Ratios • Qualities issues/complaints • MPD analysis • Manpower • Process control • Mill throughput /downtime • Water consumption • Processing cost /CAPEX. - Annual Sustainability Department Internal Audit - The Mill Advisor visits. <p>The Mill Manager then develop action plans from the Mill Advisor visit report and internal audit report for improvement of mill 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>Kemaman POM has established and implemented its commitment to a long term sustainability and financial viability through an</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>operating expenditure /capital expenditure planning. The five years planning horizon 2019/20-2023/24 is available.</p> <p>The mill budget for each financial year July-June comprises of the following components;</p> <ul style="list-style-type: none"> - Crop processed with anticipated extraction ratios including a 5-year forecast (FFB processed, CPO and PK production). - Cost components <ul style="list-style-type: none"> • General charges statement (mill maintenance, process shift labour, general services) • Capital expenditure statement (building, plant and machinery, utilities and lab/office equipment) • Plant Factory inclusive of manufacture cost/dispatch cost • Processing Cost <p>For example, CAPEX allocated for 2019 include:</p> <ul style="list-style-type: none"> - Workers quarters – cluster: 1 x 4 unit - LTDS cyclone structure, conveyor & roofing - Particulate Emission Control System: compliance towards Clean Air Regulation 2014 - Post-heating cooker: to improve pre-digestion process 	
Criterion 4.6.3: Transparent and fair price dealing			
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 POM received only own FFB crops from its certified estates. However, the pricing of FFB available and was displayed at the weighbridge area.</p>	Complied



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Criterion / Indicator		Assessment Findings	Compliance
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Contracts are fair, legal and transparent as per sampled agreement between TDM Plantation – Kemaman POM dated 01/01/2019 and Koperasi Ladang Kelapa Sawit Kemaman Terengganu Berhad valid from 01/01/2019 – 31/12/2019, transporter will provide transportation or tanker to fill, transport belonged to TDM to agreed destination and price. The procedures for outsourced process has been clearly mentioned and agreed with signature of acceptance by both parties.	Complied
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 provided MSPO information and documentation for engaged contractors via work agreement signed by the contractors prior to delivery of work items and/or services. Briefing to contractors together done by mill management to contractors during signing of <i>Perjanjian Pesanan Kerja</i> (Work Order Agreement) which included the provision for contractors to comply with legal requirements, MSPO requirements and authorization by the mill to audit the contractors from time to time on their compliance against all relevant requirements. The general MSPO briefing to all engaged contractors was conducted by the mill management on 2/7/2019 at Pelantoh Estate Training Room.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Evidence of agreed contracts with contractor provided by the mill as per following samples: <ul style="list-style-type: none"> - Work Order Agreement # P/CO5/135/2019; Date: 8/6/2019; Contractor: KKF Engineering & Automation 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Work Order Agreement # P/CO5/125/2019; Date: 7/5/2019; Contractor: Kejuruteraan PPG Sdn. Bhd. - Work Order Agreement # P/CO5/174/2019; Date: 22/7/2019; Contractor: KHB Technology Sdn. Bhd. 	
4.6.4.3	<p>The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.</p> <p>- Minor compliance –</p>	TDM Plantation Sdn Bhd has agreed for BSI auditors to verify the assessment through a 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 Certification Unit complies with the MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholder and MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills. It is recommended that the certification of TDM Plantation Kemaman POM and Estates Certification Unit is approved.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Haji Hassan Bin Osman	Name: Hafriazhar Bin Mohd. Mokhtar
Company name: TDM Plantation Sdn. Bhd. – Kemaman Palm Oil Mill	Company name: BSI Services Malaysia Sdn. Bhd.
Title: Mill Manager	Title: Lead Auditor
Signature: 	Signature: 
Date: 16/2/2020	Date: 14/2/2020

Appendix A: Assessment Plan

Date	Time	Subjects	HMM	MM
Monday 2/9/2019	PM	Audit team travel to Paka & Check-in @ The Qamar Hotel Paka	✓	✓
Tuesday 3/9/2019	08:30 – 09:00	Opening Meeting (Kemaman Palm Oil Mill) <ul style="list-style-type: none"> • Presentation by TDM Kemaman • Presentation by BSI Lead Auditor -introduction of team member and assessment agenda • Confirmation of assessment scope and finalizing audit scope 	✓	✓
	09:00 – 12:30	Kemaman Palm Oil Mill Mill Assessment: 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 – 12:00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	✓	-
	12:30 – 13:30	Lunch break		
	13:30 – 16:30	Kemaman Palm Oil Mill Document Review (MS2530 Part 4 & Part 3), 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, P6 : Best practices	✓	✓
	16:30 – 17:00	Interim closing meeting	✓	✓
Wednesday 4/9/2019	08:30- 12:30	Tebak Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓
	11:00 – 12:00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	✓	✓
	12:30 – 13:30	Lunch break	✓	✓
	13:30 – 16:30	Tebak Estate Document review (MS:2530 Part 3), 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 and P6 : Best practices, P7: Development of New Planting	✓	✓
	16:30 – 17:00	Interim closing meeting	✓	✓
Thursday 5/9/2019	08:30- 12:30	Jernih Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP,	✓	✓

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Date	Time	Subjects	HMM	MM
		workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.		
	12:30 – 13:30	Lunch break	✓	✓
	13:30 – 16:30	Jernih Estate Document review (MS:2530 Part 3), 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 and P6 : Best practices, P7: Development of New Planting	✓	✓
	16:30 – 17:00	Interim closing meeting	✓	✓
Friday 6/9/2019	08:30-12:30	Air Putih Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓
	12:30 – 13:30	Lunch break	✓	✓
	13:30 – 16:30	Air Putih Estate Document review (MS:2530 Part 3), 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 and P6 : Best practices, P7: Development of New Planting	✓	✓
	16:30 – 17:00	Closing meeting	✓	✓
Saturday 7/9/2019	AM	Audit team travel back to KL	✓	✓

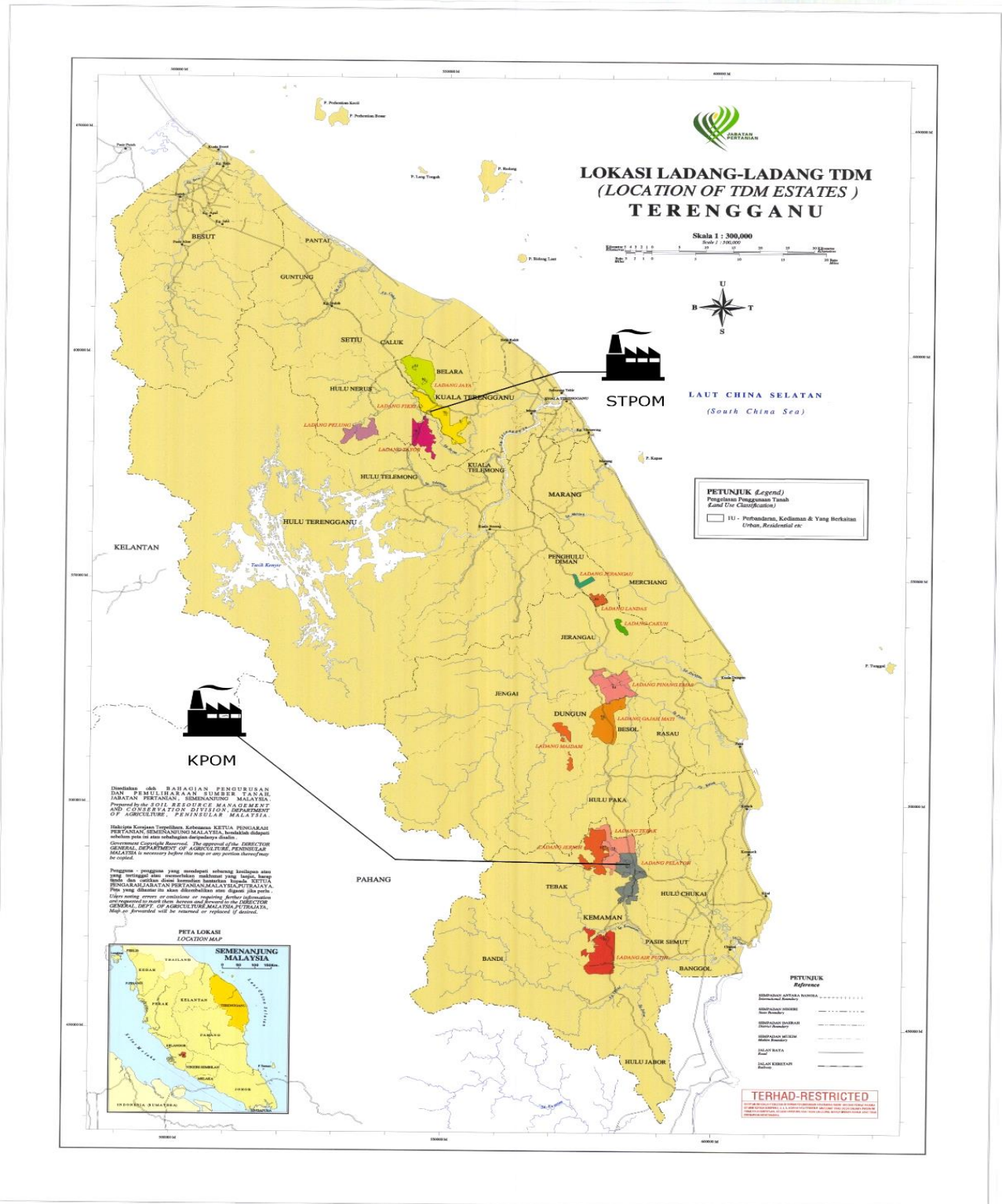
Appendix B: List of Stakeholders Contacted

Internal Stakeholders	External Stakeholders
<p>Kemaman POM Management team and staff</p> <p>On site compliance executives</p> <p>Mill Manager and Assistants</p> <p>Estate Managers and Assistants</p> <p>Facility Administrators</p> <p>Gender Committee Representatives</p> <p>Male and Female workers</p> <p>Workers Representatives</p> <p>Foreign Workers Representatives</p>	<p>Jabatan Kerja Raya – Cawangan Kemaman</p> <p>Local Villagers - MPKK Sungai Mas</p> <p>General Contractor - Chong Trading/Kejuruteraan</p> <p>Prisma/FA Sama Trading</p> <p>FFB Transport contractor</p>

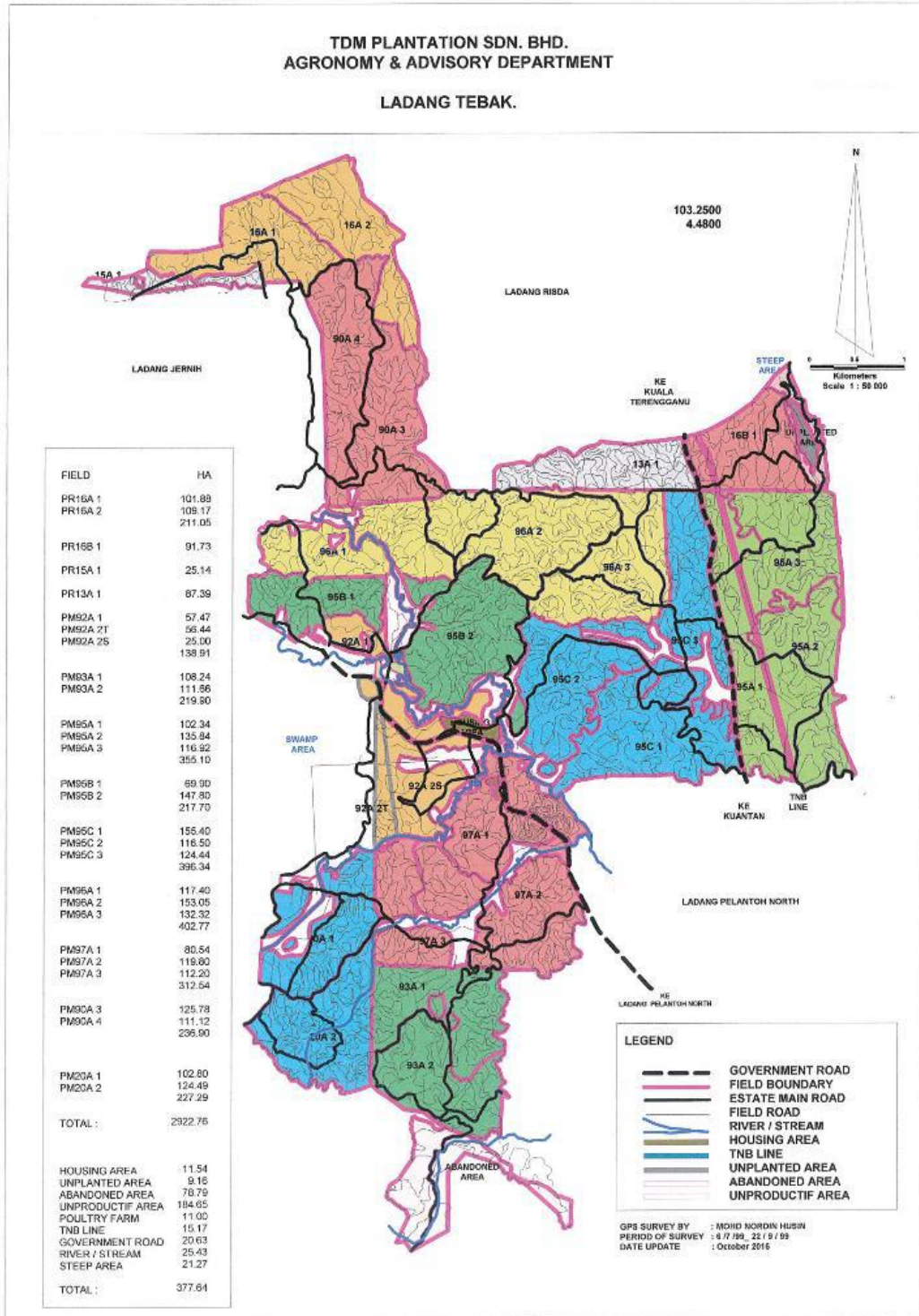
Appendix C: Smallholder Member Details

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				

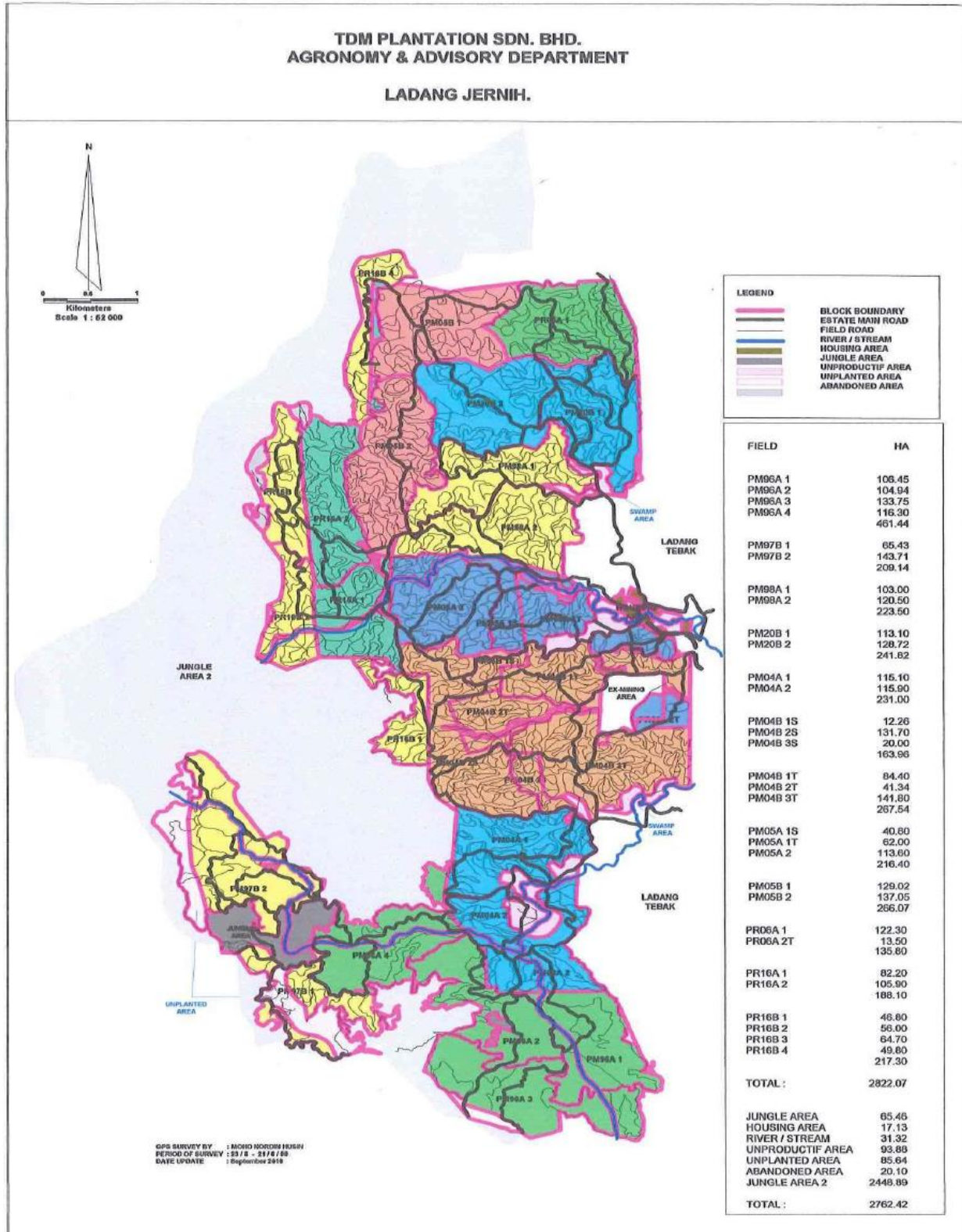
Appendix D: Location and Field Maps (Location of TDM Mill & Estates)



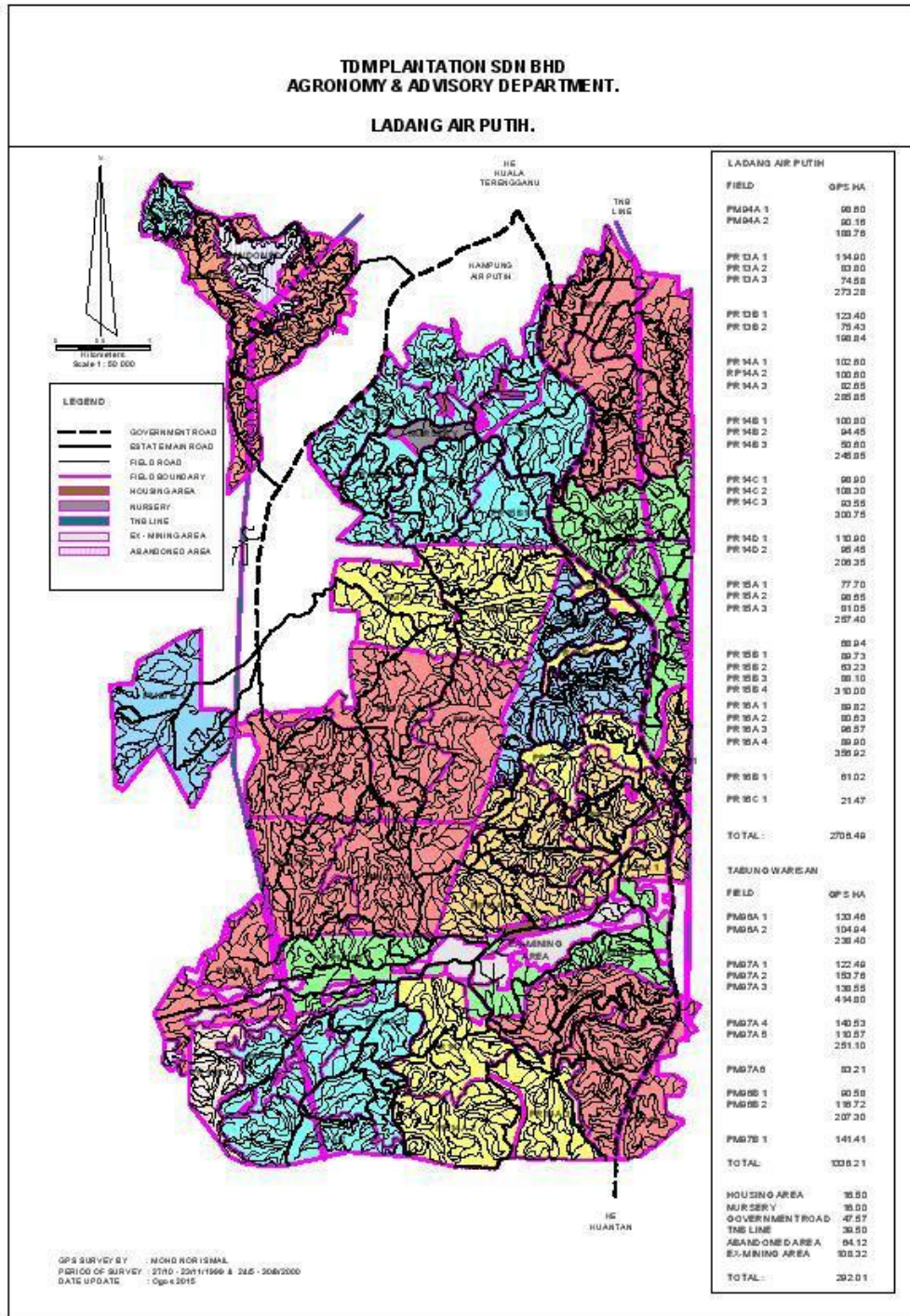
Tebak Estate



Jernih Estate



Air Putih Estate



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