

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

<b>TDM Plantation Sdn Bhd</b>
<b>Head Office:</b> Level 3, Bangunan UMNO Terengganu Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu Terengganu, Malaysia
<b>Certification Unit:</b> Sungai Tong Palm Oil Mill & Plantations: Jaya Estate, Fikri Estate, Tayor Estate, Pelung Estate, Jerangau Estate and Pinang Emas Estate  <b>Location of Certification Unit:</b> Kilang Kelapa Sawit Sungai Tong, Lot 7663, Batu 23, Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu, Terengganu, Malaysia

**Report prepared by:**  
**Elzy Ovktafia Chairul** (Lead Auditor)

**Report Number: 9674213**

**Assessment Conducted by:**  
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## Section 1: Executive Summary

<b>1.1 Organizational Information and Contact Person</b>			
MPOB License/Expiry	Sungai Tong Palm Oil Mill: 501497502000 (31.3.2020) Jaya Estate: 501497502000 (31.3.2020) Fikri Estate: 50337910200 (31.8.2020) Tayor Estate: 501496702000 (31.3.2020) Pelong Estate: 502826702000 (31.3.2020) Jerangau Estate: 502250102000 (31.8.2020) Pinang Emas Estate: 502606002000 (29.2.2020)		
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 Sungai Tong, Lot 7663, Batu 23, Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu, Terengganu, Malaysia		
Group name if applicable:	N/A		
Subsidiary of (if applicable)	N/A		
Contact Person Name	Mohd Izwan Haffez bin Che Azmi		
Website	<a href="http://www.tdmberhad.com.my">www.tdmberhad.com.my</a>	E-mail	<a href="mailto:izwan.tdmp@tdmberhad.com.my">izwan.tdmp@tdmberhad.com.my</a>
Telephone	09-6204 800/ 019-9515 898	Facsimile	09-6204 803

<b>1.2 Certification Information</b>			
Certificate Number	Mill: MSPO 678754 Plantations: MSPO 686825		
Issue Date	27/12/2017	Expiry date	26/12/2022
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)	24-25 September 2017		
Continuous Assessment Visit Date (CAV) 1	9-11 December 2018		
Continuous Assessment Visit Date (CAV) 2	23-26 September 2019		
Continuous Assessment Visit Date (CAV) 3	-		
Continuous Assessment Visit Date (CAV) 4	-		
<b>Other Certifications</b>			

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Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 595564	RSPO Principles & Criteria for Sustainable Palm Oil Production:2013; Malaysian National Interpretation: 2014; RSPO Supply Chain Certificate June 2017 for CPO Mills (Module E: Mass Balance)	BSI Services Malaysia Sdn. Bhd.	26/12/2023
MPOB/CoP/MF/0010	Code of Good Milling Practice for Oil Palm Mills	Malaysian Palm Oil Board	20/12/2021

### 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
Sungai Tong Palm Oil Mill	Sungai Tong, 21500 Setiu, Terengganu, Malaysia	102° 54' 37.80" E	5° 18' 29.88" N
Jaya Estate	Sungai Tong, 21500 Setiu, Terengganu, Malaysia	102° 53' 30.12" E	5° 21' 15.84" N
Fikri Estate	Sungai Tong, 21500 Setiu, Terengganu, Malaysia	102° 53' 51.36" E	5° 19' 21.00" N
Tayor Estate	Sungai Tong, 21500 Setiu, Terengganu, Malaysia	102° 53' 27.60" E	5° 15' 57.60" N
Pelung Estate	Sungai Tong, 21500 Setiu, Terengganu, Malaysia	102° 49' 59.52" E	5° 16' 55.56" N
Jerangau Estate	Wakil Pos Pelar, 21810 Ajil, Terengganu, Malaysia	103° 9' 46.79" E	4° 57' 39.60" N
Pinang Emas Estate	Bukit Besi, 23000 Dungun, Terengganu, Malaysia	103° 13' 25.68" E	4° 45' 39.96" N

### 1.4 Plantings & Cycle

Estate	Age (Years) - ha				
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30
Jaya Estate	-	-	2,920.72	444.78	-
Fikri Estate	484.78	82.36	1,323.06	1,213.65	-
Tayor Estate	462.19	-	465.98	1,027.88	171.22
Pelong Estate	671.44	-	-	304.54	375.90
Jerangau Estate	689.08	479.61	-	59.72	208.16
Pinang Emas Estate	886.17	79.57	565.60	1,257.43	35.14
<b>Total (ha)</b>	3193.66	641.54	5,275.36	4,308.00	790.42

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<b>1.5 FFB Production (Actual) and Projected (tonnage)</b>			
<b>Estate</b>	<b>Estimated</b> <i>(Dec 2018– Nov 2019)</i>	<b>Actual</b> <i>(Dec 2018-Aug 2019)</i>	<b>Forecast</b> <i>(Dec 2019-Nov 2020)</i>
Jaya Estate	66,700.00	47,617.59	69,800.00
Fikri Estate	49,010.00	36,496.22	45,590.00
Tayor Estate	30,490.00	22,658.78	29,900.00
Pelung Estate	6,450.00	4,336.84	4,100.00
Jerangau Estate	15,280.00	3,362.37	15,000.00
Pinang Emas Estate	5,250.00	2,061.44	3,320.00
*Gajah Mati Estate	-	1,529.65	-
*Maidam Estate	-	23.14	-
<b>Total</b>	173,180.00	118,086.03	167,710.00

Note: \*Crop diversion from other TDM certified unit.

<b>1.6 Certified CPO / PK Tonnage</b>			
<b>Mill Capacity:</b> 60 MT/hr	<b>Estimated</b> <i>(Dec 2018– Nov 2019)</i>	<b>Actual</b> <i>(Dec 2018-Aug 2019)</i>	<b>Forecast</b> <i>(Dec 2019-Nov 2020)</i>
	<b>FFB</b>	<b>FFB</b>	<b>FFB</b>
	173,180.00	117,967.90	167,710.00
	<b>CPO (OER: 20.50%)</b>	<b>CPO (OER: 18.88%)</b>	<b>CPO (OER: 20.50%)</b>
	35,501.90	22,272.34	34,380.55
	<b>PK (KER:5.00%)</b>	<b>PK (KER: 4.14%)</b>	<b>PK (KER:5.00 %)</b>
	8,659.00	4,883.87	8,385.50

Note: 117,967.90 MT is the total of FFB processed from Dec 2018 until Aug 2019 while 118,086.03 MT is the total of FFB received from Dec 2018 until Aug 2019. The variance value is 118.13 MT.

<b>1.7 Certified Area</b>					
<b>Estate</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Jaya Estate	3,365.50	-	90.29	3,455.79	97.39
Fikri Estate	3,103.85	-	607.20	3,711.05	83.64
Tayor Estate	2,127.27	5.00	87.65	2,219.92	95.83
Pelong Estate	1,351.88	305.88	1,359.44	3,017.20	44.81
Jerangau Estate	1,436.57	-	44.35	1,480.92	97.01

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Pinang Emas Estate	2,823.91	-	1,046.27	3,870.18	72.97
<b>Total</b>	14,208.98	310.88	3,240.20	17,755.06	80.03

**1.8 Details of Certification Assessment Scope and Certification Recommendation:**

BSI Services Malaysia Sdn Bhd has conducted the TDM Plantation Sdn Bhd – Sungai Tong Palm Oil Mill located in Setiu, Terengganu comprising 6 estates, 1 palm oil mill, HCV 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.

The onsite assessment was conducted on 23-26 September 2019.

Based on the assessment result, TDM Plantation Sdn Bhd – Sungai Tong 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 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 23-26 September 2019. The audit programme is included as Appendix A. The approach to the audit was to treat the mill or plantations as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. MS 2530-3:2013 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 sample were determined based on formula  $S = r\sqrt{n}$  where n is the number of estates.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the MSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings. Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix B. All the previous nonconformities are remains closed. The assessment findings for the initial assessment are detailed in Section 4.2.

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:

<b>1. Assessment Program</b>					
<b>Name (Mill / Plantation / Group smallholders)</b>	<b>Year 1 (Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
Tong Palm Oil Mill	✓	✓	✓	✓	✓
Jaya Estate	✓	-	✓	-	✓
Fikri Estate	✓	-	✓	-	✓
Tayor Estate	✓	-	✓	-	✓
Pelung Estate	-	✓	-	✓	-
Jerangau Estate	-	✓	-	✓	-
Pinang Emas Estate	-	✓	-	✓	-

**Tentative Date of Next Visit: September 21, 2020 - September 24, 2020**

**Total No. of Mandays: 8**

**BSI Assessment Team:**

**Elzy Ovktafia - Lead Assessor**

She graduated from Universiti Putra Malaysia in Diploma of Agriculture while Licentiate Diploma and Advanced Diploma from the Incorporated Society of Planters. She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO and MSPO for more than 3 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for MSPO, RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015, ISO 14001:2015 and Social Compliance Audit by Verite. Prior to that, she was the Agronomist in R&D Department for 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During assessment, she covers the legal issues, land use rights, stakeholder consultation, worker’s welfare and social issues.

**Daniel Francis – Team Member**

Daniel Francis is a fulltime employee with BSI Services Malaysia. He holds a Bachelor of Applied Science Degree in Food Science, graduated from Charles Sturt University, Australia. He has over 8 years of working experience in the oil and gas industry and 3 years in the food & beverage industry. He is an experienced auditor for several management system standards including ISO 9001, ISO 14001, OHSAS 18001 and Integrated Management System. He had completed the ISO 9001:2015 Lead Auditor Course and RSPO SCC Lead Auditor Course. He had been involved in the RSPO & MSPO audits with various companies in Malaysia. During assessment, he covers the legal issues and occupational safety and health.

**Accompanying Persons: -**



### Section 3: Assessment Findings

#### 3.1 Details of audit results

This assessment has been assessed using the following MSP0 normative requirements. The assessment details are provided in Appendix A.

- MSP0 MS 2530-2:2013 – General Principles for Independent Smallholders
- MSP0 MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders
- MSP0 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 Certification Assessment there were Four (4) Major nonconformities raised. The TDM Plantation Sdn Bhd – Sungai Tong Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Major Nonconformities:		
Ref	Area/Process	Clause
<i>NC ID from eReport</i>	1821642-201909-M1	4.3.1.1 Major – Part 3
Requirements:	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.	
Statement of Nonconformity:	The compliance for legal requirement is not effectively demonstrated.	
Objective Evidence:	1. In Fikri Estate, the JTK Permit for salary deduction is not available.  2. Employment Act 1955: a) Jaya Estate, the wages for Md Rafikul Islam on April 2019 was paid for 24 working days instead of his actual 25 working days. b) Tayor Estate, the tools allowance for Roni Harianto was paid RM 19.47 instead of RM 21.23. c) Fikri Estate, the tools allowance was paid for Mohammad Habil Miah RM 28.56 instead of RM 29.32 for June 2019 and RM 7.74 instead of RM 7.83 for Apr 2019.  3. Minimum Wages Order 2018: a) Tayor Estate: Public Holiday was paid less than minimum wages for Roni Harianto (RM 8.46/day in Apr 2019) and Sudi (RM 37.56/day in Aug 2019). b) Fikri Estate: Public Holiday was paid less than minimum wages for Sudi (RM 41.27/day in Apr 2019, RM 41.38/day for Aug 2019) and Norsuziayu (RM29.89/day for Aug 2019). c) Jaya Estate: Public Holiday was paid less than minimum wages for Omi Saputra (RM 37.39/day for Aug 2019).	

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	<p>4. WORKERS' MINIMUM STANDARDS OF HOUSING AND AMENITIES ACT 1990:  a) Jaya Estate: it was found that in Bangladesh workers house (K04B 21002) and Indonesian workers house (K04B 15002 and K04B 15001) have blocked drain.  b) Tayor Estate: it was found that in Bangladesh workers house (K06B16103) have blocked drain.</p>
<p>Corrections:</p>	<ol style="list-style-type: none"> <li>1. Estate management has requested the copy of the approval letter from JTK Besut/ Setiu.</li> <li>2. Employment Act 1955: <ol style="list-style-type: none"> <li>a) For another day's payoff has been made to Md Rafikul Islam on 25th September 2019.</li> <li>b) A meeting has been conducted on 7th October 2019 with HR department representative to inform about the system error.</li> </ol> </li> <li>3. Minimum Wages Order 2018: <ol style="list-style-type: none"> <li>a) Additional payment has been made on 5th October 2019 through "Baucer Wang Runcit".</li> <li>b) Additional payment will be made on October 2019 salaries.</li> </ol> </li> <li>4. To clean the blocked drain immediately.</li> </ol>
<p>Root cause analysis:</p>	<ol style="list-style-type: none"> <li>1. Estate have submitted application to JTK Besut/ Setiu in year 2017 and has been approved. However, during the auditing process, estate management unable to produce the approval letter to auditors.</li> <li>2. Employment Act 1955: <ol style="list-style-type: none"> <li>a) There is error in plant-ware system. The system supposed to capture 25 working days which already key-in by the payroll officer. The system however only captured for 24 working days for Md Rafikul Islam on April 2019. Suspected there was a power shortage or internet connection problem when keying in the data.</li> <li>b) Tool allowance was paid according to the tonnage of the month multiplied by RM0.60.</li> <li>c) For Fikri and Tayor Estate, the actual tool allowance payment to the respective workers are correct. However, when the auditor asked for payslip and reprinted for the current month from plant-ware system, the tonnage automatically increased by the system, thus affecting the calculation of the tools allowance. This is due to plant-ware system error.</li> </ol> </li> <li>3. Wrong calculation is due to check roll Plant-ware system error.</li> <li>4. Minimum Wage Order 20198: <ol style="list-style-type: none"> <li>a) The clogged drain is due to a pile of wood after storm incident.</li> <li>b) Drainage checking are not included in existing line-site inspection checklist and no report of blocked drain has been made. The estate also experienced heavy rain on 24/9/2019.</li> </ol> </li> </ol>
<p>Corrective Actions:</p>	<ol style="list-style-type: none"> <li>1. Estate will improve the current available checklist of all relevant document/ certificates and its permit expiry.</li> </ol>

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	<ol style="list-style-type: none"> <li>2. Superior/ field officer to ensure the plant-ware system and check roll recorded is in line with the attendance, OT, etc., before the pay-out is made by manually double checking the data.</li> <li>3. TDMP HQ will produce a memo to remind all CC against reprinting worker's payslip during an audit session to prevent the same issue from happening again.</li> <li>4. Public holidays will be pay based on MAPA/NUPW daily rate RM42.31 to all estate workers. TDMP HQ will produce a memo regarding this issue.</li> <li>5. To assign permanent employee to perform drainage maintenance at line site.</li> <li>6. To conduct weekly checking. Using the new line-site inspection which has included checking on drainage.</li> <li>7. New line-site inspection checklist has included drainage inspection in weekly line-site inspection.</li> </ol>
<p>Assessment Conclusion:</p>	<p>Audit team have reviewed the evidence submitted on 24/12/2019 and the major NC is satisfactorily closed on 24/12/2019. Continuous implementation of corrective action taken will be further verified in the next assessment visit.</p> <p>Evidence reviewed:</p> <ol style="list-style-type: none"> <li>1. JTK Permit: Potongan Upah di Bawah Seksyen 24 Akta Kerja 1955 dated 22/10/2017 for Ladang Fikri for Simpanan Tabung Haji, Bil Air &amp; Elektrik, Yuran Kesatuan Sekerja, Yuran Koperasi Ladang Sungai Tong, Yuran JKK (Perkampungan).</li> <li>2. "Baucer Wang Runcit" dated 25/09/2019 &amp; Akuan Penerimaan to Mohammad Rafikul Islam for RM 42.31.</li> <li>3. "Baucer Wang Runcit" dated 5/10/2019 to Supardifor RM 42.31.</li> <li>4. Drainage cleaning status.</li> <li>5. Meeting with HR for MSPO.RSPO finding on 07/10/2019.</li> <li>6. "Baucer Wang Runcit" dated 05/10/2019 for RM 48.16 to Roni Harianto.</li> <li>7. "Baucer Wang Runcit" dated 09/10/2019 for RM 48.16 to Supardi.</li> <li>8. Appointment letter of person in charge for linesite inspection on 30/12/2017 to Mr Suhaimi Bin Jusoh (HA).</li> <li>9. Revised legal checklist includes JTK permit monitoring of expiry dates.</li> <li>10. Memo titled "Kewajipan Untuk Menyemak Checkroll &amp; Payslip Sebelum Penutupan Akaun Pada Setiap Bulan" dated 08/12/2019 tp all clerks and chief clerk from Manager of Jaya Estate</li> <li>11. Memorandum from TDMP Headquarters on the public holiday payment ro all estate &amp; mill manager dated 06/11/2019.</li> <li>12. Revised linesite inspection checklist includes draignage conditions for Jaya Estate &amp; Tayor Estate.</li> </ol>

<b>Major Nonconformities:</b>		
<b>Ref</b>	<b>Area/Process</b>	<b>Clause</b>
<i>NC ID from eReport</i>	1821642-201909-M2	4.3.1.1 Major –Part 4
Requirements:	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.	

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Statement Nonconformity:	of	The compliance for legal requirement is not effectively demonstrated.
Objective Evidence:		<p>1. In Sungai Tong Palm Oil Mill, Azhar bin Mansor has been hired as contract workers for 3 months since 1 November 2017 continuously until now but didn't has the EPF contribution at all. This is not complying with the EMPLOYEES PROVIDENT FUND ACT 1991.</p> <p>2. In Sungai Tong Palm Oil Mill, the wages pay for Fatimah Osman on Jun 2019 was paid for 20 working days instead of his actual 21 working days. This is not complying with the Employment Act 1955.</p>
Corrections:		<ol style="list-style-type: none"> <li>1. EPF contribution has been made for both employees (RM2,079.00) and employer (RM2,456.00) on 7th October 2019.</li> <li>2. Another one working day has been added in affected worker salary for the Month of October 2019.</li> </ol>
Root cause analysis:		<ol style="list-style-type: none"> <li>1. For contract workers, only SOCSO contribution are being made, considering of accidents before or after work. However, no EPF contribution were made until they get their confirmation as permanent worker.</li> <li>2. There is human error during data key-in in Mill-ware System.</li> </ol>
Corrective Actions:		<ol style="list-style-type: none"> <li>1. EPF contribution will be made even though the hired worker is contract worker. The implementation of EPF contribution to the contract worker will be stated in his/ her offer letter.</li> <li>2. Supervisor to double check the workers' payslip (no of working days, OT, shift allowance, etc.) before account closing to ensure the wages paid align with the check-roll and attendance.</li> </ol>
Assessment Conclusion:		<p>Audit team have reviewed the evidence submitted on 24/12/2019 and the major NC is satisfactorily closed on 24/12/2019. Continuous implementation of corrective action taken will be further verified in the next assessment visit.</p> <p>Evidence reviewed:</p> <ol style="list-style-type: none"> <li>1. The EPF pay in arrears (Borang A) for Azhar Bin Mansor) amounted RM 2456 (employer) and RM 2079 (employee).</li> <li>2. Payment voucher of RM 42.31 to Fatimah Binti Mansor June 2019.</li> <li>3. Memorandum from Mill Manager to HR clerk dated 29/09/19 on the need for EPF contribution for contract worker, temporary or casual worker as well as probation worker hired as per EPF Act 1991.</li> <li>4. Example of new offer letter (Normawarni Binti Omar) dated 28/10/2019 for probationa period of 3 months will immediately eligible to have EPF contribution from employer.</li> <li>5. Memorandum from Mill Manager to all clerks and chief clerk titled "Kewajipan Untuk Menyemak Checkroll &amp; Payslip Sebelum Penutupan Akaun Pada Setiap Bulan" dated 15/10/2019.</li> </ol>

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Major Nonconformities:		
Ref	Area/Process	Clause
<i>NC ID from eReport</i>	1821642-201909-M3	4.5.3.3 Major –Part 4
Requirements:	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	
Statement Nonconformity:	of	Handling of used chemicals was not effectively implemented.
Objective Evidence:	Sighted traces of oil spills/residues evident on the grounds in the surrounding areas of the workshop.	
Corrections:	The traces of oil spills/ residues have been removed immediately.	
Root cause analysis:	The oil spill has been removed. However, the traces of oil still there. The oil came from a gearbox that had been placed at undesignated area and caused pollution in the surrounding area.	
Corrective Actions:	To allocate specific area for gearbox or any oil contained equipment for maintenance purposes.	
Assessment Conclusion:	Audit team have reviewed the evidence submitted on 24/12/2019 and the major NC is satisfactorily closed on 24/12/2019. Continuous implementation of corrective action taken will be further verified in the next assessment visit.  Evidence reviewed: The current status is work in progress for gearbox area or any oil contained for maintenance purpose.	

Major Nonconformities:		
Ref	Area/Process	Clause
<i>NC ID from eReport</i>	1821642-201909-M4	4.5.3.3 Major –Part 3
Requirements:	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.	
Statement Nonconformity:	of	Handling of used chemicals was not effectively implemented.
Objective Evidence:	Oil trap (workshop) was not effectively maintained at both Jaya and Fikri estates.	
Corrections:	The spillages/ oil stain has been cleaned. The oil trap will be fenced properly and to carry out training to the dedicated workers who is responsible to do collection.	
Root cause analysis:	Spillages/ oil stain at the trap because of wrong handling during collection time. Lack of monitoring which caused the oil trap was not effectively maintained.	
Corrective Actions:	1. Estate Management has improvised the SOP for handling schedule waste at the oil trap.	

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	2. To conduct checking at oil trap at least once a month.
Assessment Conclusion:	<p>Audit team have reviewed the evidence submitted on 24/12/2019 and the major NC is satisfactorily closed on 24/12/2019. Continuous implementation of corrective action taken will be further verified in the next assessment visit.</p> <p>Evidence reviewed:</p> <ol style="list-style-type: none"> <li>1. SOP for Pengumpulan Minyak Kotor Daripada Oil Trap.</li> <li>2. Checklist titled "Monthly oil trap inspection for November 2019".</li> <li>3. Checklist been used on 07/11/2019 &amp; 12/12/2019 by Fikri Estate, 11/11/2019 &amp; 15/12/2019 by Jaya Estate.</li> <li>4. Fencing for oil/filter area at Jaya Estate.</li> <li>5. Latihan dan Penerangan Tentatng Barang Yang Trjadual/Oil Trap management on 22/09/2019 from Assistant Manager to 11 workers in Jaya Estate and 24/12/2019 attended by 19 workers in Fikri Estate.</li> </ol>

**Opportunity For Improvement**

Ref	Area/Process	Clause
<i>NC ID from eReport</i>	-	
Requirements:		
Objective Evidence:		

**Noteworthy Positive Comments**

1	Good cooperation among the team.
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**3.3 Status of Nonconformities Previously Identified and OFI**

**Major Nonconformities:**

Ref	Area/Process	Clause
<i>NC ID from eReport</i>	1720560-201812-M1	4.3.1.1
Requirements:	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations	
Statement of Nonconformity:	Found certain compliance not been followed as per applicable laws and regulations	
Objective Evidence:	<p>Sg. Tong Mill:</p> <ol style="list-style-type: none"> <li>i) Found oil drum in Biocompost been store without proper storage control.</li> <li>ii) Found leachate from EFB storage not properly channel back into effluent pond as per Jadual Pematuhan Seksyen 21.</li> <li>iii) Found oil spillage in Boiler Station not been handled properly as Scheduled Waste 2005.</li> </ol>	
Corrections:	<ol style="list-style-type: none"> <li>i) The drum was sent back to the mill store immediately after the audit session.</li> <li>ii) The estate is required to lift the EFB whenever they are loading FFB at mill ramp.</li> </ol>	

	iii) As for their understandings, mill management has conducted a demo training on how to handle schedule waste in case of oil spillage.
Root cause analysis:	<p>i) The site which the oil drum found is not permanent site for oil drum storage. The site is only temporarily site to facilitate driver to take oil to change oil for the vehicle. Normally the drum will be sending back to the mill store after vehicle service.</p> <p>ii) EFB are placed temporarily on platform before being lifted by estate lorry. However due to rainy season the EFB were not properly lifted/ disposed to the field.</p> <p>iii) Mill management has conducted few trainings related to chemical handling and environment. Still the workers did not apply in their routine work.</p>
Corrective Actions:	<p>i) To inform all staff in written memo to ensure that the drum kept in proper store.</p> <p>ii) To construct sump for leachate collection. The leachate then will be channeled back into palm oil mill effluent.</p> <p>iii) For the year of 2019, to conduct more environment awareness training and chemical handling amongst workers and staff. At the end of the training, they are required to fill up feedback form to ensure and measure their understandings.</p>
Assessment Conclusion:	<p>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 10/3/2019.</p> <p><u>ASA 2 verification:</u>            Corrective action was effectively implemented.            Memo (ref:KL.KBIO/MSPO/001.18) dated 09/12/2018 was issued on the prohibition of storage of lubricating oils/hydraulic oils on the premises of the Sungai Tong plant. Verified during site tour that a concrete empty bunch leachate sump with bund wall was constructed. Sighted awareness training record for Scheduled Waste Training dated 22/09/2019 attended by 10 employees, Chemical Handling Training (Medical Surveillance) dated 03/07/2019 attended by 23 employees and Environmental Training dated 28/01/2019 attended by 70 employees.            Evidence of morning briefing (on every Monday) and weekly briefing (2/2019) on 28/01/2019 was also available. Hence, the major NC remained closed.</p>

**Opportunity For Improvement**

- 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.

ASA 2 verification:  
 Sighted awareness training record for CHRA training on 18/09/2019 (Jaya Estate), First Aid Training on 15/09/2019 (Jaya Estate), Schedule Waste Management training on 12/08/2019 (Tayor Estate, etc. Corrective action was effectively implemented.
- 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.

ASA 2 verification:  
 Sighted awareness training record for Scheduled Waste Training dated 22/09/2019 attended by 10 employees, Chemical Handling Training (Medical Surveillance) dated 03/07/2019 attended by 23 employees and Environmental Training dated 28/01/2019 attended by 70 employees.  
 Corrective action was effectively implemented.

3.	<p>Part 3 - 4.4.5.11: Non-authorized additional construction and extension or renovation of company's house shall be observed.</p> <p><u>ASA 2 verification:</u>          As per company capital budget approved, in Jaya, Tayor &amp; Fikri Estate the new housing for workers were planned to be built by phases in 5 years plan. Corrective action was effectively implemented.</p>
4.	<p>Part 4 - 4.4.5.11: Non-authorized additional construction and extension or renovation of company's house shall be observed.</p> <p><u>ASA 2 verification:</u>          During ASA2 audit, it was found out that there is no additional non-authorized additional construction and extension or renovation of company's house. The existing house with old renovation has been warned off by the management.          Corrective action was effectively implemented.</p>

### 3.4 Issues Raised by Stakeholders

IS #	Description
<b>1</b>	<p><b>Issues:</b>            School's Representatives – No issue with estate and mill. TDM management is supportive and provide contribution whenever requested. Students are from estate, village and nearby town area. No negative feedback or complaint received from any parents related to TDM management. Based on communication and daily observation done by teachers, there is no signs that students is working after school or during school break.</p>
	<p><b>Management Responses:</b>            Will continue to include schools representative in stakeholder meeting and support any request made by the school.</p>
	<p><b>Audit Team Findings:</b>            No further issue.</p>
<b>2</b>	<p><b>Issues:</b>            Suppliers and Contractors - Informed that payment are made promptly, within 20~25 days once invoice is issued. Has good relationship with the management, receive regular invitation for meeting and attended stakeholder meeting. No late payment.</p>
	<p><b>Management Responses:</b>            Have being dealing with the company for years and will continue to ensure payment is made promptly.</p>
	<p><b>Audit Team Findings:</b>            Payment records reviewed and confirmed they are made promptly.</p>
<b>3</b>	<p><b>Issues:</b>            Neighbouring Village Representative (Kg. Selamat, Kg. Tayor Tengah, Kg Ladang Sungai Tong) – Estate management is supportive and responded to request made promptly. No complain received so far from any of the villager. No land encroachment. Have good relationship with the estate management and always receive invitation for meeting. The most recent meeting is in regards to MSPO and RSPO introduction and sharing of information.</p>
	<p><b>Management Responses:</b>            The management acknowledged good relationship with the village representative and recently meet up with stakeholder. Will continue to support the villager and assist on any request made to the best they can</p>
	<p><b>Audit Team Findings:</b>            No further action.</p>
<b>4</b>	<p><b>Issues:</b></p>



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	<p>Gender Committee Representatives – Well verse with the procedure to lodge complain if there is any case of sexual harassment. No issues received in relates to sexual abuse or harassment from members. TDM management is supportive and contributes to the committee including participating events organized. Have carried out several activities such as break fasting during Ramadhan month, volley ball competition, tour, etc.</p> <p><b>Management Responses:</b> Will continue to support the committee and open to any suggestion and complaints for further improvement.</p> <p><b>Audit Team Findings:</b> No further action</p>
<b>5</b>	<p><b>Issues:</b> Workers’ Representatives – The workers have informed that their wages were according to Minimum Wage Order 2018. No discrimination was occurred and they were treated equally does not matter the gender and nationalities. They were provided with free housing and medical facilities, but charged on water and electricity utilities.</p> <p><b>Management Responses:</b> Will ensure compliance to legal requirements is maintained.</p> <p><b>Audit Team Findings:</b> No other issue.</p>

**3.5 Summary of the Nonconformities and Status**

CAR Ref.	CLASS	ISSUED	STATUS
1530255-201709-M1	Major	25/9/17	Closed on 28/11/17
1530255-201709-M2	Major	25/9/17	Closed on 28/11/17
1530255-201709-M3	Major	25/9/17	Closed on 28/11/17
1530255-201709-M4	Major	25/9/17	Closed on 28/11/17
1530255-201709-M5	Major	25/9/17	Closed on 28/11/17
1530255-201709-M6	Major	25/9/17	Closed on 28/11/17
1530255-201709-M7	Major	25/9/17	Closed on 28/11/17
1530255-201709-N1	Minor	25/9/17	Closed on 11/12/18
1530255-201709-N2	Minor	25/9/17	Closed on 11/12/18
1530255-201709-N3	Minor	25/9/17	Closed on 11/12/18
1720560-201812-M1	Major	11/12/18	Closed on 10/03/19
1821642-201909-M1	Major	26/12/19	Closed on 24/12/19
1821642-201909-M2	Major	26/12/19	Closed on 24/12/19
1821642-201909-M3	Major	26/12/19	Closed on 24/12/19
1821642-201909-M4	Major	26/12/19	Closed on 24/12/19

**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
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	A policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	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.	Yes
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. <b>- Major compliance -</b>	For TDM Plantation Sdn. Bhd. (TDMP), the MSPO Policy has been established and authorized by the Chief Executive Officer dated 1/8/2017.	Yes
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	Internal audit was planned as per 2019 MSPO/RSPO Compliance Audit Plan and conducted from 15/08/2019 (Jaya Estate), 17/09/2019 (Tayor Estate) and 12/09/2019 (Fikri Estate). 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.	Yes
<b>4.1.2.2</b>	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	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	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	implement the necessary corrective action. - <b>Major compliance</b> -	Recommendations form as per sighted for the latest audit conducted. Sighted the Corrective Action Report on Non-compliance Findings on the analysis of nonconformity raised.	
<b>4.1.2.3</b>	Report shall be made available to the management for their review. - <b>Major compliance</b> -	Report made available for review in the management review meeting and recorded in the minutes under "Corrective Action Report of Non-Compliance Findings".	Yes
<b>Criterion 4.1.3 – Management Review</b>			
<b>4.1.3.1</b>	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. - <b>Major compliance</b> -	Latest management review conducted on 22/09/2019 as per records of minutes of meeting "Minit Mesyuarat Management Review (RSPO/MSPO) TDMP Kali Ke-2 02/2019".	Yes
<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - <b>Major compliance</b> -	Continuous Improvement Plan FY2019 for TDM Sg. Tong estates was established in terms of social and environment as per following samples: <u>Jaya Estate - reviewed on 15/09/2019</u> - Problem/Issues: Complaint that there is a bit of landscape; Action: Some landscaping are required.	Yes

Criterion / Indicator		Assessment Findings	Compliance
		<p>- Problem/Issues: Upgrade the ripple rinsing and premix store; Action: To prepare a proper place for their workers to perform triple rinsing procedure and a place to properly store.</p> <p><u>Tayor Estate - reviewed on 01/01/2019</u></p> <p>- Problem/Issues: IPM System; Action: Barn owl, rat census, beneficial plant (Tunera spp) &amp; Bio organic fertilizer.</p> <p>- Problem/Issues: Grabber; Action: Mechanization and cost reduction.</p> <p><u>Fikri Estate - reviewed on 15/01/2019</u></p> <p>- Problem/Issues: Waste Recycle; Action: Inform workers to separate waste using the 3R bins.</p> <p>- Problem/Issues: Water pollution; Action: Triple rinsing.</p>	
<b>4.1.4.2</b>	<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><b>- Major compliance -</b></p>	<p>TDM Sg. Tong estates has established a system that will be able to reduce the dependency of extensive labor in the estate field activities.</p>	Yes
<b>4.1.4.3</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>TDM Sg. Tong estates has established action plans on the following:-</p> <ul style="list-style-type: none"> <li>- use of mechanical spreader for manuring activity.</li> <li>- use of mechanical grabber for harvesting activity.</li> <li>- use of nozzle cone for spraying activity.</li> </ul>	Yes

Criterion / Indicator	Assessment Findings	Compliance	
<b>4.2 Principle 2: Transparency</b>			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
<b>4.2.1.1</b>	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.  <b>- Major compliance -</b>	Jaya, Tayor and Fikri Estate 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.	Yes
<b>4.2.1.2</b>	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.  <b>- Major compliance -</b>	The information regarding sustainability and the company is available in website <a href="https://sustainability.tdmberhad.com.my/">https://sustainability.tdmberhad.com.my/</a> and also publicly available in each complex. Sighted the policies were displayed publicly in the office board.	Yes
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	Procedures shall be established for consultation and communication with the relevant stakeholders.  <b>- Major compliance -</b>	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.	Yes
<b>4.2.2.2</b>	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.	The Estate Manager was appointed as the management officials as per Letter of "Perlantikan Sebagai Wakil Syarikat Bagi Mengendalikan Isu Sosial Dengan Pihak Luar Di Peringkat Ladang/Kilang" from Group	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	- <b>Minor compliance</b> -	Senior Human Resource Manager; (ref: TDMP/HR/PSN-GEN/RSPO; dated 02.09.2014 for Jaya Estate, ref: TDMP/HR/PSN-GEN (MSPO/RSPO) dated 18.09.2017 for Tayor Estate and ref: TDMP/HR/PSN-GEN(MSPO/RSPO dated 18/09/2017.	
<b>4.2.2.3</b>	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.  - <b>Major compliance</b> -	Stakeholder list was developed where all the affected stakeholders were included into the list such as government authorities, local communities, contractors and supplier, neighbouring schools and etc. for the sampled 3 estates.  Latest Stakeholder Meeting dated 23/7/2019 was conducted at Akademi TDM for the whole Sg. Tong Complex with the participation of internal and external stakeholders. Seen the meeting minutes and attendance list. No issue was raised during the meeting. Only questions and requests were raised and immediate replies from the management during the meeting	Yes
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).  - <b>Major compliance</b> -	SOP on the traceability of the FFB has established and describe in the TDM Plantation Sdn. Bhd. MSPO Standard Operating Procedure dated 01/8/2017. Assistant Manager was responsible and the records were kept by harvesting supervisors.	Yes
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system.  - <b>Major compliance</b> -	Estate supervisor will verify the records related to the traceability of FFB. Sighted the harvesting record for the month of August 2019 for all estate.	Yes

Criterion / Indicator		Assessment Findings	Compliance
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - <b>Minor compliance</b> -	All the field and harvesting supervisors were responsible to implement and maintain the traceability system.	Yes
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - <b>Major compliance</b> -	Records of sales and delivery/transportation of FFB were maintained and updated on daily basis as part of estate production report.	Yes
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - <b>Major compliance</b> -	TDM Sg Tong estates has continued to implement its compliance with legal requirements.  Among the evidence of compliance verified were: <u>Jaya Estate</u> a) MPOB License#: 501497502000; validity 01/04/2019 – 31/03/2020. b) Diesel permit KPDNKK serial no: T 000007-BST; Ref no: KPDNKK.BST.800-1/8/09/13 (SK/D&P); Quantity: 8,190 litre; validity 29/01/2019 – 28/01/2020. c) Certificate of fitness for air receiver #TG PMT 5172; valid until 18/12/2019. <u>Tayor Estate</u>	Major non-conformities

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Criterion / Indicator	Assessment Findings	Compliance
	<p>a) MPOB License#: 616586011000; validity 01/07/2019 – 30/06/2020.</p> <p>b) Diesel permit KPDNKK serial no: T 001002; Ref no: KPDNHEP.BST.800-1/8/12/19 (SK/D); Quantity: 10,000 litre; validity 04/08/2019 – 03/08/2020.</p> <p>c) Certificate of fitness for air receiver #TG PMT 4424; valid until 25/11/2020.</p> <p><u>Fikri Estate</u></p> <p>a) MPOB License#: 503379102000; validity 01/09/2019 – 31/08/2020.</p> <p>b) Certificate of fitness for air receiver #TG PMT 3948; valid until 19/03/2020.</p> <ol style="list-style-type: none"> <li>1. JTK Permit Approval: Potongan Upah Di bawah Seksyen 24 Akta 1955 (Reference JTK/(T) 600.2.2.4 (6) dated 20/07/2017 for electricity &amp; water bill, NUPW, Koperasi PEMIN TRG Berhad, Tabung Haji, Koperasi Ladang Sungai Tong, Perkampungan fund and store.</li> <li>2. Lembaga Pendaftaran Pembantu-Pembantu Hospital Estate (No pendaftaran: P1080 dated 16/04/2002) for Suhaimi bin Jusoh.</li> <li>3. JTK Permit Approval: Potongan Upah Di bawah Seksyen 24 Akta 1955 (Reference PTK/ST/600.2.2(34) dated 07/02/2013.</li> </ol> <p>However, some legal compliances were not effectively implemented as below:</p> <ol style="list-style-type: none"> <li>1. In Fikri Estate, the JTK Permit for salary deduction is not available.</li> </ol>	



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Criterion / Indicator	Assessment Findings	Compliance
	<p>2. Employment Act 1955:</p> <ul style="list-style-type: none"> <li>a) Jaya Estate, the wages for Md Rafikul Islam on April 2019 was paid for 24 working days instead of his actual 25 working days.</li> <li>b) Tayor Estate, the tools allowance for Roni Harianto was paid RM 19.47 instead of RM 21.23.</li> <li>c) Fikri Estate, the tools allowance was paid for Mohammad Habil Miah RM 28.56 instead of RM 29.32 for June 2019 and RM 7.74 instead of RM 7.83 for Apr 2019.</li> </ul> <p>3. Minimum Wages Order 2018:</p> <ul style="list-style-type: none"> <li>a) Tayor Estate: Public Holiday was paid less than minimum wages for Roni Harianto (RM 8.46/day in Apr 2019) and Sudi (RM 37.56/day in Aug 2019).</li> <li>b) Fikri Estate: Public Holiday was paid less than minimum wages for Sudi (RM 41.27/day in Apr 2019, RM 41.38/day for Aug 2019) and Norsuziayu (RM29.89/day for Aug 2019).</li> <li>c) Jaya Estate: Public Holiday was paid less than minimum wages for Omi Saputra (RM 37.39/day for Aug 2019).</li> </ul> <p>4. WORKERS' MINIMUM STANDARDS OF HOUSING AND AMENITIES ACT 1990:</p> <ul style="list-style-type: none"> <li>a) Jaya Estate: it was found that in Bangladesh workers house (K04B 21002) and Indonesian workers house (K04B 15002 and K04B 15001) have blocked drain.</li> <li>b) b) Tayor Estate: it was found that in Bangladesh workers house (K06B16103) have blocked drain.</li> </ul>	

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Criterion / Indicator	Assessment Findings	Compliance
<p><b>4.3.1.2</b></p> <p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p><b>- Major compliance -</b></p>	<p>In TDM Sg. Tong estates, the management has already listed all laws applicable to their operation such as OSHA 1996, FMA 1978, Min. Housing and Amenities Act 1990 and others.</p>	<p>Yes</p>
<p><b>4.3.1.3</b></p> <p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p><b>- Major compliance -</b></p>	<p><u>Jaya Estate</u></p> <p>Legal Register Ladang Jaya FY2019 was available and updated on 24/06/2019; prepared by Noor Mastura (CC), Reviewed by Asst Manager and approved by En Mohd Zamry Bin Abdullah (Estate Manager).</p> <p><u>Tayor Estate</u></p> <p>Estate Legal Register Ladang Jaya FY2019 was available and updated on 01/02/2019; prepared by Hasnah Bte Seman (CC), Reviewed by Asst Manager and approved by En Mohd Rosli Bin Mukhtar (Estate Manager).</p> <p><u>Fikri Estate</u></p> <p>Estate Legal Requirement Year 2019 was available and updated on 23/08/2019; prepared by Mohd Zailani Bin Mat Ail (Assistant Manager), Verified by Asst Manager and approved by En Mohd RADzwan Bin Azid (Estate Manager).</p> <p>Minimum Wages Order (Amendment) 2018, Employment Insurance Scheme (EIS) and MAPA/NUPW Agreement on the wages of harvesters, harvesting Kanganies, Loaders and other Loaders on Oil Palm estates 2019 have already been updated in the TDM Sg Tong Legal Register that applies to all their operation.</p>	<p>Yes</p>

Criterion / Indicator		Assessment Findings	Compliance
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p><b>- Minor compliance -</b></p>	<p>The mechanism for ensuring compliance for all TDM Sg. Tong estates was done through evaluation of compliance. The status of compliance was reported in the legal register itself.</p> <p><u>Jaya Estate</u></p> <p>The management has assigned En Zahari Bin Jusoh and Pn Noor Masture Binti Embong (Letter of appointment dated 10/06/2019) to track and update the regulatory requirements.</p> <p><u>Tayor Estate</u></p> <p>The management has assigned En Ah,ad Hazizi Bin Abdul Rahin and Pn Hasnah Binti Seman (Letter of appointment dated 10/06/2019) to track and update the regulatory requirements.</p> <p><u>Fikri Estate</u></p> <p>The management has assigned En En Mohd Zailani Bin Mat Ail (Letter of appointment dated 01/08/2019) to track and update the regulatory requirements.</p>	Yes
<b>Criterion 4.3.2 – Lands use rights</b>			
4.3.2.1	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p><b>- Major compliance -</b></p>	<p>There is no land dispute in the Sungai Tong Certification units at the time of audit. The land belongs to TDM and land ownership documents verified.</p>	Yes
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of</p>	<p>Legal ownership (lease agreement) of land was provided by TDM Sg. Tong estates management during audit.</p>	Yes

Criterion / Indicator	Assessment Findings	Compliance
<p>the land.</p> <p><b>- Major compliance -</b></p>	<p>Sighted the following records:</p> <p><u>Jaya Estate</u></p> <ol style="list-style-type: none"> <li>1. Land Lease Agreement between Perbadanan Memajukan Iktisad Negeri Trengganu and Kumpulan Ladang-ladang Trengganu Sdn Bhd dated 29/08/1983 (Duration: 99 years).</li> <li>2. State Land Title (Ownership no: 6001; Lot no: 6558; Area: 1661.4191 hectar).</li> <li>3. State Land Title (Ownership no: 12885; Lot no: 7250; Area: 1413.0873 hectar).</li> </ol> <p><u>Tayor Estate</u></p> <ol style="list-style-type: none"> <li>1. Land Lease Agreement between Perbadanan Memajukan Iktisad Negeri Trengganu and Kumpulan Ladang-ladang Trengganu Sdn Bhd dated 07/02/2018 (Duration: 99 years).</li> <li>2. State Land Title (Ownership no: 1533; Lot no: 54; Area: 1.8110 hectar).</li> <li>3. State Land Title (Ownership no: 1546; Lot no: 94; Area: 1.7349 hectar).</li> </ol> <p><u>Fikri Estate</u></p> <ol style="list-style-type: none"> <li>1. State Land Title (Ownership no: 561; Lot no: PT 642 K; Area: 635.8752 hectar).</li> <li>2. State Land Title (Ownership no: 6491; Lot no: 7662; Area: 128.6784 hectar).</li> </ol>	

Criterion / Indicator		Assessment Findings	Compliance
		3. State Land Title (Ownership no: 6521; Lot no: 7663; Area: 58.7685 hectar).	
<b>4.3.2.3</b>	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.  - <b>Major compliance</b> -	Legal perimeter boundary markers uses a pole painted with TDM colors (blue, red and white).  Trenches as a boundary was build by TDM Sg. Tong estates within its land perimeter.  The boundaries were clearly marked within field at the estate boundary area.	Yes
<b>4.3.2.4</b>	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).  - <b>Minor compliance</b> -	There is no land dispute in the Sungai Tong Certification units at the time of audit. The land belongs to TDM and land ownership documents verified.	Yes
<b>Criterion 4.3.3 – Customary rights</b>			
<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.  - <b>Major compliance</b> -	No any lands encumbered by customary rights within TDM Sg. Tong complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	Yes
<b>4.3.3.2</b>	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available.  - <b>Minor compliance</b> -	No any lands encumbered by customary rights within TDM Sg. Tong complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	Yes

Criterion / Indicator		Assessment Findings	Compliance
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. <b>- Major compliance -</b>	No any lands encumbered by customary rights within TDM Sg. Tong complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	Yes
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. <b>- Minor compliance -</b>	Initial Social Impact Assessment (SIA) Kompleks Sungai Tong; Report date: May 2012 by SRA Consultancy. Based on this initial assessment, action plan was established on annual basis as per sighted Action Plan Revision 2019/2020; Reviewed on 15/09/2019 (Jaya Estate) and 22/08/2019 (Fikri Estate). Sighted area of concerns including entertainment facilities and environment.	Yes
<b>Criterion 4.4.2: Complaints and grievances</b>			
<b>4.4.2.1</b>	A system for dealing with complaints and grievances shall be established and documented. <b>- Major compliance -</b>	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.	Yes
<b>4.4.2.2</b>	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. <b>- Major compliance -</b>	Based on Complaint Form File, 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.	Yes

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4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - <b>Minor compliance</b> -	Communication Record Logbook for Linesite Repair and Complaint/ Request form was established and implemented. No external stakeholders were recorded related on complaint and grievances.	Yes
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - <b>Minor compliance</b> -	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.	Yes
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - <b>Major compliance</b> -	The complaint logbook/ complaint files that recorded complaints and solutions since at least January 2012 was maintained available to affected stakeholders upon request.	Yes
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - <b>Minor compliance</b> -	Contributions were made as part of Continuous Improvement Plan FY2019/2020 Review on 4/08/2019. Sighted contributions were as following: <ul style="list-style-type: none"> <li>a. Fund support for worker’s children for university (RM100) on 19/9/2019 (Jaya Estate).</li> <li>b. PIBG school fund for SK Kampung Bari (RM100) on 19.09.2019 (Jaya Estate).</li> <li>c. Majlis Buka Puasa di Ladang Tayor on 08/05/2019 (Tayor Estate).</li> <li>d. Free transportation for student of SK Kampung Tayor to the Perbadanan Perpustakaan Awam on 26/02/2019 (Tayor</li> </ul>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		Estate). e. PIBG SK LKTP Belara on 21.01.2019 (Fikri Estate). f. Request Van for SK Kampung Fikri on 17.06.2019 (Fikri Estate).	
<b>Criterion 4.4.4: Employees safety and health</b>			
<b>4.4.4.1</b>	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. <b>- Major compliance -</b>	TDM Plantation Sdn Bhd has established the Occupational, Safety & Health Policy dated 1 <sup>st</sup> September 2017 which was signed by the TDM Plantation CEO, En Jailani Bin Che Kar.  The policy was communicated to all workers during the morning briefings.  The OSH plan has developed and in-lined with company's policy and incorporated with the training plan, training matrix and training schedules.	Yes
<b>4.4.4.2</b>	The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: i. all employees involved shall be adequately trained on safe working practices	a) TDM Plantation Sdn Bhd has established the Occupational, Safety & Health Policy dated 01/09/2017, which was signed by the TDM Plantaion CEO, En Jailani Bin Che Kar.  <u>Jaya Estate</u> The policy was communicated to all workers during the morning briefings and latest record was on 02/07/2019.  <u>Tayor Estate</u> The policy was communicated to all workers during the morning briefings and latest record was on 04/08/2019.	Yes



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<ul style="list-style-type: none"> <li>ii. all precautions attached to products shall be properly observed and applied</li> <li>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).</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</li> </ul>	<p><u>Fikri Estate</u>            The policy was communicated to all workers during the morning briefings and latest record was on 25/07/2019.</p> <p>b) HIRARC was established to include all the activities in all the TDM Sg. Tong estates.</p> <p><u>Jaya Estate</u>            HIRARC register was last reviewed on 10/06/2019. No changes was recorded.</p> <p>CHRA report (Ref: HQ/12/ASS/00/306 – 2019/0021) for assessment date 19/08/2019 – 17/09/2019 by Medi-Ihsan Occupational Safety and Health Sdn Bhd (HQ/12/ASS/00/306) was available.</p> <p><u>Tayor Estate</u>            HIRARC register was last reviewed on 19/08/2019. Changes recorded for harvesting (cutting FFB and fronds) due to recent accident.</p> <p>CHRA report (Ref: JKPP HIE 127/171/2(8)-2017/021) for assessment date 21/06/2017 by Occumed Consultancy &amp; Services Sdn Bhd (JKPP HIE 127/171/2(8)) was available.</p> <p>Medical surveillance conduct for 8 employees (storekeeper, sprayer &amp; clerk officer) by OHD (HQ/19/DOC/00/00380) from Klink Ar Rijal/Klinik Perubatan Hijrah. All employees were fit to work except for 1 employee (Azdiya Suhana Binti Arifin – to repeat test after 3 mths).</p> <p><u>Fikri Estate</u></p>	

Criterion / Indicator	Assessment Findings	Compliance
<p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>HIRARC register was last reviewed on 23/01/2019. No changes was recorded.</p> <p>CHRA report for assessment date 10/11/2014 – 13/01/2015 by Medi-Ihsan Occupational Safety and Health Sdn Bhd - JKKP HIE 127/171-2(306) was available.</p> <p>c) Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE.</p> <p>d) Suitable PPE has been provided to the workers based on the information in the MSDS and CHRA assessor’s recommendation.</p> <p>e) SOP of safety can be referred on Standard Operating Procedure edition TDPM/01 revision TDMP – 01/2001 dated 1 May 2011. Same also for emergency response procedure and HIRARC is in the same documentation.</p> <p>f) The OSH Committee appointment letter was available.</p> <p>Jaya Estate - OSH Chairman appointment letter (ref: TDMP/OD/05/32.00) dated 28/11/2016.</p> <p>Taylor Estate – OSH Chairman appointment letter (ref: TDMP/OD/05/32.00) dated 28/11/2016.</p> <p>Fikri Estate - OSH Chairman appointment letter (ref: TDMP/OD/05/32.00 dated) 28/11/2016.</p>	

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	<p>g) OSH meeting is conducted quarterly and meeting minutes was available.</p> <p>Jaya Estate - Sighted records for OSH meeting minutes dated 15/09/2019, 10/03/2019 &amp; 10/12/2018.</p> <p>Taylor Estate - Sighted records for OSH meeting minutes dated 11/09/2019, 18/06/2019, 27/03/2019 &amp; 18/12/2018.</p> <p>Fikri Estate - Sighted records for OSH meeting minutes dated 17/09/2019, 25/06/2019, 13/03/2019 &amp; 28/11/2018.</p> <p>h) Accident and emergency procedures had been written and briefed to staff, workers, contractors and visitors.</p> <p>Jaya Estate - Fire drill was last conducted on 23/10/2018 to all workers, staff and executives.</p> <p>Taylor Estate - Fire drill was last conducted on 18/06/2019 to all workers, staff and executives.</p> <p>Fikri Estate - Fire drill was last conducted on 05/09/2019 to all workers, staff and executives.</p> <p>i) First aid boxes were available at worksite. All items/contents in the first aid box were found adequate and not expired.</p> <p>Jaya Estate - First aid training was last conducted on 15/9/2019 by the Hospital Assistant (HA).</p> <p>Taylor Estate - First aid training was last conducted on 13/6/2019 by the Hospital Assistant (HA).</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Fitri Estate - First aid training was last conducted on 27/02/2019 by the Hospital Assistant (HA).</p> <p>j) Record of all accidents are well kept. Accident/incidences are reviewed during the safety meetings.</p> <p>Records on Lost Time Accident (LTA) metrics was maintained and based on JKPP 6, 7 &amp; 8.</p> <p><u>Jaya Estate</u></p> <p>JKKP 8 was submitted to DOSH on 24/01/2019. No accidents reported.</p> <p><u>Tayor Estate</u></p> <p>JKKP 6 submitted on 30/07/2018 (accident on 15/07/2018) and 27/03/2018 (accident on 20/02/2018).</p> <p>JKKP 8 was submitted to DOSH on 26/01/2019. 2 accidents reported.</p> <p><u>Fikri Estate</u></p> <p>JKKP 8 was submitted to DOSH on 02/01/2019. No accidents reported.</p>	
<b>Criterion 4.4.5: Employment conditions</b>			
<b>4.4.5.1</b>	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p><b>- Major compliance -</b></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 02/07/2019 (Jaya Estate), 04/08/2019 (Tayor Estate) and 25/07/2019 (Fikri Estate) by phases in each gang during Monday morning briefing. The policies were displayed at the notice board outside the office.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p><b>- Major compliance -</b></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 02/07/2019 (Jaya Estate), 04/08/2019 (Tayor Estate) and 25/07/2019 (Fikri Estate). The policies were displayed at the notice board outside the office.</p>	Yes
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>The management have ensured that employees' pay and conditions meet applicable legal requirements i.e. National Minimum Wages Order 2018. Sighted pay slips as below sampled workers for Aug, Jul, Jun and Apr 2019:</p> <ul style="list-style-type: none"> <li>• Md Farikul Islam (Jaya Estate)</li> <li>• Omi Saputra (Jaya Estate)</li> <li>• Ruminah (Jaya Estate)</li> <li>• Mariati Binti Mat Diah (Jaya Estate)</li> <li>• Sufrie Iwadi (Tayor Estate)</li> <li>• Alife Molla (Tayor Estate)</li> <li>• Roni Harianto (Tayor Estate)</li> <li>• Supardi (Tayor Estate)</li> <li>• Mohammad Habil Miah (Fikri Estate)</li> </ul>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>Leli Hatrian (Fikri Estate)</li> <li>Sudi (Fikri Estate)</li> <li>Nursuziayu Binti Abdul Latif (Fikri Estate)</li> </ul>	
<b>4.4.5.4</b>	<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><b>- Minor compliance -</b></p>	<p>There is no employee of contractors hired in Jaya Estate. All workers are check roll workers.</p>	Yes
<b>4.4.5.5</b>	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p><b>- Major compliance -</b></p>	<p>There is (Plantware) Employee Details System used for a reference of 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.</p>	Yes
<b>4.4.5.6</b>	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p><b>- Major compliance -</b></p>	<p>Fair contracts have been signed by both employee and employer with both kept a copy each. Sample contract sighted as following:</p> <ul style="list-style-type: none"> <li>Md Farikul Islam (Jaya Estate)</li> <li>Omi Saputra (Jaya Estate)</li> <li>Ruminah (Jaya Estate)</li> <li>Mariati Binti Mat Diah (Jaya Estate)</li> <li>Sufrie Iwadi (Tayor Estate)</li> </ul>	Yes

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		<ul style="list-style-type: none"> <li>• Alife Molla (Tayor Estate)</li> <li>• Roni Harianto (Tayor Estate)</li> <li>• Supardi (Tayor Estate)</li> <li>• Mohammad Habil Miah (Fikri Estate)</li> <li>• Leli Hatrian (Fikri Estate)</li> <li>• Sudi (Fikri Estate)</li> <li>• Nursuziayu Binti Abdul Latif (Fikri Estate)</li> </ul>	
<b>4.4.5.7</b>	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p><b>- Major compliance -</b></p>	<p>Estates established a time recording system using Check Roll Book for all employees at different station. The working hours for all employees has been clearly documented in the Check Roll Book as well as their pay slip under OT section to ensure transparent for both employees and employer. Time recording system has been carried out manually on daily basis. The documented working hours available in the daily check roll records</p>	Yes
<b>4.4.5.8</b>	<p>The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.</p> <p><b>- Major compliance -</b></p>	<p>Working hours is 8 hours. From Monday to Saturday. The overtime maximum is 104 hours according to the Employment Act 1955. As at current status, there was none has crossed 100 hours of overtime. Verified the payslips, the payment and calculation of overtime well distributed.</p> <p>The overtime rate after 8 hours daily rated is as following:</p> <ul style="list-style-type: none"> <li>- Sun - Thu – daily rated / 8 hours x 1.5</li> <li>- Friday - daily rated / 8 hours x 2.0</li> <li>- Public holiday – daily rated / 8 hours x 3.0</li> </ul>	Yes

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><b>- Major compliance -</b></p>	<p>Wages and overtime payment documented found consistent with legal regulations and collective agreements. Sighted pay slips for following samples:</p> <ul style="list-style-type: none"> <li>• Md Farikul Islam (Jaya Estate)</li> <li>• Omi Saputra (Jaya Estate)</li> <li>• Ruminah (Jaya Estate)</li> <li>• Mariati Binti Mat Diah (Jaya Estate)</li> <li>• Sufrie Iwadi (Tayor Estate)</li> <li>• Alife Molla (Tayor Estate)</li> <li>• Roni Harianto (Tayor Estate)</li> <li>• Supardi (Tayor Estate)</li> <li>• Mohammad Habil Miah (Fikri Estate)</li> <li>• Leli Hatrian (Fikri Estate)</li> <li>• Sudi (Fikri Estate)</li> <li>• Nursuziayu Binti Abdul Latif (Fikri Estate)</li> </ul>	Yes
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><b>- Minor compliance -</b></p>	<p>Other forms of social benefits for workers are as following:</p> <ul style="list-style-type: none"> <li>• Free school transportation (All Estate)</li> <li>• Free medical care (All Estate)</li> <li>• Jawatankuasa Perkampungan for own saving (All Estate)</li> <li>• Sport Day on 30/08/2019 (Tayor Estate)</li> <li>• Bubur Asyura Ceremony on 21/09/2019 (Tayor Estate)</li> </ul>	Yes



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<b>4.4.5.11</b>	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.  - <b>Major compliance</b> -	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.	Yes
<b>4.4.5.12</b>	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.  - <b>Major compliance</b> -	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.  Estate has its own gender committee and activities including meeting was conducted quarterly. Sighted the minutes meeting dated on 25/08/2019, 03/06/2019 and 11/03/2019 for Jaya Estate, 24/03/2019 and 26/09/2019 for Tayor Estate and 29/08/2019 and 16/04/2019 for Fikri Estate.	Yes
<b>4.4.5.13</b>	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.	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.  Sighted the latest employee representative meeting as per records of minutes of meeting Kesatuan Pekerja-Pekerja Ladang dated 28/07/2019 (Jaya Estate), 13/12/2019 (Tayor Estate) and 12/06/2019 (Fikri Estate).	Yes

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	- Major compliance -		
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not have exposed to hazardous working conditions.</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>	Yes
<b>Criterion 4.4.6: Training and competency</b>			
4.4.6.1	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p>- Major compliance -</p>	<p>Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices.</p> <p>The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE.</p>	Yes
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>The training needs is available identified training that needed for each workers for their job scope.</p> <p>Training was given by the employer such as scheduled waste training, first aid training, and chemical handling and etc.</p>	Yes

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<b>4.4.6.3</b> 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. <b>- Minor compliance -</b>	Training records for employees available and maintained at the office. Records are verified on a sampling basis which covers all aspect of training and MSPO requirement.		Yes	
	Date	Training		Remark
	18/09/2019	CHRA Training		Jaya Estate
	15/09/2019	First Aid Training		Jaya Estate
	04/07/2019	Manuring technique and PPE Usage		Jaya Estate
	11/03/2019	BTS Harvesting SOP Training		Jaya Estate
	19/08/2019	Buffer Zone Training		Tayor Estate
	12/08/2019	Schedule Waste Management		Tayor Estate
	20/07/2019	Harvesting		Tayor Estate
	18/04/2019	Manuring		Tayor Estate
	24/07/2019	PPE/Sprayer Training		Fikri Estate
	23/07/2019	Manuring & PPE Safety Training		Fikri Estate
17/02/2019	FFB Quality & Traceability Training	Fikri Estate		

Criterion / Indicator		Assessment Findings			Compliance
		23/01/2019	Pesticide Application Training	Fikri Estate	
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>					
<b>Criterion 4.5.1: Environmental Management Plan</b>					
<b>4.5.1.1</b>	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.  - <b>Major compliance</b> -	<p>TDM Plantations Sdn Bhd has established an Environmental &amp; Biodiversity policy and management plan with relevant to the applicable laws and regulations.</p> <p>The policy was signed by the TDM Plantation Chief Executive Director, on 1st September 2017.</p> <p>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.</p> <p>Interviews of staff and workers found that the policy has been communicated and implemented.</p>			Yes
<b>4.5.1.2</b>	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations.  - <b>Major compliance</b> -	<p>TDM Sg. Tong estates has established SOP for the operating units to conduct the Environmental Impact Assessment and documented in the TDM Estate Quality Management Systems Sub Section 5.4.</p>			Yes
<b>4.5.1.3</b>	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.	<p>The environmental improvement plan has been established and documented in the Environmental Aspect &amp; Impact Identification and Environmental Impact Evaluation.</p>			Yes

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	- <b>Major compliance</b> -	<p>The assessment covers all operation in the estate including support activities such as harvesting, spraying, FFB loading, building construction and field upkeep.</p> <p><u>Jaya Estate</u>                      Latest review conducted on 01/01/2019 with no changes.</p> <p><u>Tayor Estate</u>                      Latest review conducted on 23/01/2019 with no changes.</p> <p><u>Fikri Estate</u>                      Latest review conducted on 21/02/2019 with no changes.</p>	
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- <b>Minor compliance</b> -</p>	<p>The monitoring records of TDM Sg. Tong estates Environment Improvement Plan/Pollution Prevention Plan/Continuous Improvement Plan are available.</p> <p>The plan reviewed annually.</p>	Yes
4.5.1.5	<p>An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.</p> <p>- <b>Major compliance</b> -</p>	<p>The awareness and training programme been established for workers to ensure environment issue is aware by the workers.</p> <p>Jaya Estate – Environmental and Biodiversity Policy awareness conducted during the morning briefing dated 02/07/2019.</p> <p>Tayor Estate – Buffer Zone Training dated 02/07/2019 &amp; Scheduled Waste Management dated 12/8/2019.</p> <p>Fikri Estate – Interpump Training dated 15/08/2019 and Extermination of Eiphyte tree training dated 27/01/2019.</p>	Yes

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4.5.1.6	<p>Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.</p> <p><b>- Major compliance -</b></p>	<p>The management have discuss environmental issue during OSH meeting done by quarterly and continuous education to the workforce done through morning briefing.</p> <p>Among the topics covered were buffer zone, HCV area and RTE species.</p> <p>Apart from that, signage of no hunting and pictures of RTE species displayed at various strategic places such as points of entry of the estate.</p>	Yes
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>			
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><b>- Major compliance -</b></p>	<p>TDM Sg. Tong estates maintains records of energy usage, which reported monthly.</p> <p>The use of the fossil fuel against the FFB production is monitored.</p> <p>Diesel consumption is only been using as tractor and other vehicle for operation activity.</p> <p>Jaya Estate - Diesel usage/FFB from Jan – Aug 2019 is 1.085 L/MT.</p> <p>Tayor Estate - Diesel usage from Jan – Aug 2019 is 2,700.625 L.</p> <p>Fikri Estate - Diesel usage/FFB from Jan – Aug 2019 is 1.158 L/MT.</p>	Yes
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.</p>	<p>TDM Sg. Tong estates have estimation on the total energy required.</p> <p>This estimation compared to the actual usage by monthly, reported for TDM Sg. Tong estates monitoring.</p>	Yes

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	This shall include fuel use by contractors, including all transport and machinery operations. <b>- Major compliance -</b>		
<b>4.5.2.3</b>	The use of renewable energy should be applied where possible. <b>- Minor compliance -</b>	There was no use of renewable energy in TDM Sg. Tong estates as to date.  Operation either is supplied by the TNB grid or the standby diesel genset and the vehicle are fully dependent on fossil fuel.	Yes
<b>Criterion 4.5.3: Waste management and disposal</b>			
<b>4.5.3.1</b>	All waste products and sources of pollution shall be identified and documented. <b>- Major compliance -</b>	TDM Sg. Tong estates has established the Waste Management Action Plan FY 2019.  Visits made to the estates showed that all waste products and sources of pollution identified and documented.  The documentation and identification of all the waste products such as scheduled waste, domestic waste and industrial waste.  Scheduled Waste identified included spent hydraulic oil (SW 305), spent lubricant oil (SW 306), used chemical containers/drums (SW 409) and used filters (SW 410).  Records on the usage and disposal were well recorded and documented.  Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas verified to be maintained.	Yes

Criterion / Indicator		Assessment Findings	Compliance												
4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <ul style="list-style-type: none"> <li>a) Identifying and monitoring sources of waste and pollution</li> <li>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</li> </ul> <p><b>- Major compliance -</b></p>	<p>Documented Waste Management Action Plan was established where the TDM Sg. Tong estates visited confirmed that the practice of reduce, reuse and recycle of materials has been implemented throughout the estates.</p> <ul style="list-style-type: none"> <li>a) Segregation of wastes i.e. general wastes and scheduled wastes verified to be satisfactory in the estates.</li> <li>b) Proper storage areas identified for the storage of the recyclable wastes at the estates.</li> </ul>	Yes												
4.5.3.3	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p><b>- Major compliance -</b></p>	<p>The Waste Management Action Plan 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>Schedule waste</td> <td>Mechanical/electrical workshop, chemical store, schedule waste store</td> <td>Send to licensed contractor</td> </tr> <tr> <td>Domestic waste</td> <td>Line site, office, workshop, store, shop</td> <td>Landfill in estate, recycling campaign</td> </tr> <tr> <td>Industrial waste</td> <td>EFB, scrap metal</td> <td>Recycling, mulching</td> </tr> </tbody> </table> <p><b>NC</b></p>	Waste	Location	Action to be taken	Schedule waste	Mechanical/electrical workshop, chemical store, schedule waste store	Send to licensed contractor	Domestic waste	Line site, office, workshop, store, shop	Landfill in estate, recycling campaign	Industrial waste	EFB, scrap metal	Recycling, mulching	Major Non-conformity
Waste	Location	Action to be taken													
Schedule waste	Mechanical/electrical workshop, chemical store, schedule waste store	Send to licensed contractor													
Domestic waste	Line site, office, workshop, store, shop	Landfill in estate, recycling campaign													
Industrial waste	EFB, scrap metal	Recycling, mulching													



Criterion / Indicator		Assessment Findings	Compliance
		<p><b><u>Jaya Estate &amp; Fikri Estate</u></b></p> <p><b>Oil trap (workshop) was not effectively maintained.</b></p>	
4.5.3.4	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p><b>- Major compliance -</b></p>	<p>The disposal of used chemicals and containers done accordingly as per regulation. Triple rinsing was evident.</p> <p>The estates also have designated Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor.</p> <p>All the records were found adequate as per required by EQ (Scheduled Waste) Regulations 2005.</p> <p>Contractor: Pentas Flora (Kelantan) Sdn Bhd (DOE License no: 004878; validity 01/05/2019 – 30/04/2020).</p> <p>Clinical Waste: Kualiti Alam Sdn Bhd (DOE License no: 003319; validity 01/05/2019 – 30/04/2020).</p> <p><u>Jaya Estate</u></p> <ul style="list-style-type: none"> <li>- SW305 - C/N: 2019081415VMDGWU; Date: 01/08/2019.</li> <li>- SW409 - C/N: 2019081415WIOHY1; Date: 01/08/2019.</li> <li>- SW410 - C/N: 20190814156PSO1S; Date: 01/08/2019.</li> <li>- SW404 – C/N: 0294984; Date: 24/07/2019.</li> </ul> <p><u>Tayor Estate</u></p> <ul style="list-style-type: none"> <li>- SW409 - C/N: 20190921142FE1L4; Date: 10/09/2019.</li> <li>- SW410 - C/N: 2019092115FM2Z40; Date: 10/09/2019.</li> </ul>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		<p><u>Fikri Estate</u></p> <ul style="list-style-type: none"> <li>- SW305 - C/N: 2019073113X54VZK; Date: 31/07/2019.</li> <li>- SW409 - C/N: 2019073113NIAS5R; Date: 31/07/2019.</li> <li>- SW410 - C/N: 2019073113Y86GNX; Date: 31/07/2019.</li> </ul>	
<b>4.5.3.5</b>	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p><b>- Minor compliance -</b></p>	<p>All domestic waste produces at the line-sites and offices of the estates are separated for recycling.</p> <p>Landfill for non-recyclables wastes are available within the TDM Sg. Tong estates and maintained as per SOP B8: Domestic Waste (Rev May 2017).</p> <p><u>Jaya Estate</u></p> <p>Landfill (2000 C7) opened for Sept – Dec 2019 was available for all domestic waste, which is collected during alternate days by the estate management.</p> <p><u>Tayor Estate</u></p> <p>Domestic waste is disposed by Majlis Daerah Setiu (MDS). Collection by MDS is 3 times per week (Sunday, Tuesday &amp; Thursday).</p> <p><u>Fikri Estate</u></p> <p>Domestic waste is disposed by Majlis Daerah Setiu (MDS). Collection by MDS is 3 times per week (Sunday, Tuesday &amp; Thursday).</p>	Yes
<p><b>Criterion 4.5.4:</b> Reduction of pollution and emission</p>			

Criterion / Indicator		Assessment Findings	Compliance												
<p><b>4.5.4.1</b></p>	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.</p> <p><b>- Major compliance -</b></p>	<p>TDM Sg. Tong estates have assessed their polluting activities. It is tabulated under the environmental management program. Therein is given potential sources of pollutants, objective &amp; targets and action to be taken.</p> <p>Sighted targeted area assessed among other as follows;</p> <table border="1"> <thead> <tr> <th>Sources/objective &amp; target</th> <th>Action steps</th> </tr> </thead> <tbody> <tr> <td>Management of HCV river reserve &amp; buffer zone conservation</td> <td>To train/retrain sprayers/manuring gang to avoid any chemical-related works at the area</td> </tr> <tr> <td>To monitor waste management plan for its suitability</td> <td>SW disposal monitoring</td> </tr> <tr> <td>To improve employees awareness on pollution prevention at housing complex including zero burning policy.</td> <td>Continuous reminders</td> </tr> <tr> <td>To minimise spillage of oil/chemical onto the ground</td> <td>Continuous training and use of spill trays</td> </tr> <tr> <td>To review aspect identification &amp; impact evaluation to identify</td> <td>Review through EIA/EIE</td> </tr> </tbody> </table>	Sources/objective & target	Action steps	Management of HCV river reserve & buffer zone conservation	To train/retrain sprayers/manuring gang to avoid any chemical-related works at the area	To monitor waste management plan for its suitability	SW disposal monitoring	To improve employees awareness on pollution prevention at housing complex including zero burning policy.	Continuous reminders	To minimise spillage of oil/chemical onto the ground	Continuous training and use of spill trays	To review aspect identification & impact evaluation to identify	Review through EIA/EIE	<p>Yes</p>
Sources/objective & target	Action steps														
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To review aspect identification & impact evaluation to identify	Review through EIA/EIE														

Criterion / Indicator		Assessment Findings		Compliance
		significant critical points for control.		
		Maintenance of sentang trees	Ensure signage & demarcation are visible to avoid chemical intervention. To monitor pollution/erosion	
<b>4.5.4.2</b>	An action plan to reduce identified significant pollutants and emissions shall be established and implemented.  - <b>Major compliance</b> -	The Waste Management Action Plan was establish, implemented and monitored regularly.  Details of action plan for identified pollutants are shown in 4.5.4.1 above.		Yes
<b>Criterion 4.5.5: Natural water resources</b>				
<b>4.5.5.1</b>	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:  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,	Sighted the implementation of the Water Management Plan: Contingency during water shortage FY 2019.  River water quality monitoring report was available.  Pesticides Water Analysis conducted annually by third party laboratory, Eralab (KT) Sdn. Bhd – IKM no: M/2979/5781/10.  <u>Jaya Estate</u>  No river or small stream in Jaya Estate.  Sampling for the Pesticides Water Analysis was taken on 12/09/2019 (Refer ERALab (KT) Sdn Bhd acknowledgement letter dated 24/09/2019). The result of the analysis is still pending.		Yes

Criterion / Indicator		Assessment Findings	Compliance
	<p>maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p><b>- Major compliance -</b></p>	<p><u>Tayor Estate</u></p> <p>Sg. Tayor and Sg. Balo in Tayor Estate.</p> <p>Sighted the latest result of Pesticides Water Analysis no. 19/06/W0471. Result of the analysis shows conformation with Class IIA/IIB.</p> <p><u>Fikri Estate</u></p> <p>Sg. Goga, Sg. Kulim and Sg. Pok Bidin in Fikri Estate.</p> <p>Sighted the latest result of Pesticides Water Analysis no. 19/08/W0750 Result of the analysis shows conformation with Class IIA/IIB.</p>	
<b>4.5.5.2</b>	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p><b>- Minor compliance -</b></p>	<p>There were no construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p>	Yes
<b>4.5.5.3</b>	<p>Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).</p> <p><b>- Minor compliance -</b></p>	<p>Rain water harvesting practices was implemented at the line site (housing), workshop, office and it will be recycled for cleaning purposes and washing of heavy machinery and also for domestic use for all the estates.</p>	Yes
<p><b>Criterion 4.5.6:</b> Status of rare, threatened, or endangered species and high biodiversity value</p>			

Criterion / Indicator	Assessment Findings	Compliance
<p><b>4.5.6.1</b> 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"> <li>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</li> <li>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.</li> </ul> <p><b>- Major compliance -</b></p>	<p>Information was collated in the Bio-Diversity Assessment (Bio-D) by SRA Consultancy on 18-19/03/2012 &amp; 15-19/04/2012 (report dated May 2012) which had covered all estates under TDM Sg. Tong including the palm oil mill.</p> <p>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>Jaya Estate – Conservation area (slope &gt;25 degree) and HCV 6 (mosque &amp; graveyard).</p> <p>Tayor Estate – Conservation area (waste and &amp; slope &gt;25 degree) and HCV 6 (mosque &amp; graveyard).</p> <p>Fikri Estate – Conservation area (slope &gt;25 degree) and HCV 6 (mosque).</p> <p>Amongst RTE species recorded at TDM Sg. Tong estates are elephant, Malayan tiger, Malayan tapir and boar.</p>	<p>Yes</p>
<p><b>4.5.6.2</b> 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"> <li>a) Ensuring that any legal requirements relating to the protection of the species are met.</li> <li>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</li> </ul>	<p>No RTE sightings found in recent years.</p> <p>Continuous education to the workforce was done through morning briefing. Among the topics covered were buffer zone, HCV area and RTE species.</p> <p>Apart from that, signage of no hunting and pictures of RTE species were also displayed at various strategic places such as points of entry of the estates.</p>	<p>Yes</p>

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	- Major compliance -		
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.  - Major compliance -	Management plan on Bio-Diversity assessment was available. The recommendations of action plans are to mitigate and reduce the impact to the environment.  Among the action plans implemented were continuous education to employees and surrounding communities about bio-diversity through explanation of company's policy, meetings, signage for buffer zone, restriction of any development activity at the areas which has been identified as Bio-Diversity.	Yes
<b>Criterion 4.5.7: Zero burning practices</b>			
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.  - Major compliance -	TDM Sg. Tong estates has established Zero Burning Policy and documented in Occupational Safety, Health and Environmental Policy signed by the CEO on 5th June 2017.  No evidence of open burning sighted during site visit at sampled estates.	Yes
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop.  - Major compliance -	Not applicable for all the sampled TDM Sg. Tong estates as there are no phytosanitation activities as to-date.  Normal land preparation practices were observed for replanting.	Yes
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities)	Not applicable for all the sampled TDM Sg. Tong estates as there are no phytosanitation activities as to-date.	Yes

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	(Open Burning) Order 2003 or other applicable laws. <b>- Major compliance -</b>	Normal land preparation practices were observed for replanting.	
<b>4.5.7.4</b>	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. <b>- Minor compliance -</b>	No use of fire for land preparation during replanting. No open burning noted based on the records on the land clearing and felling for the replanting work. Method of land clearing and preparation was used such as (felling & chipping, cambering/land forming and path construction).	Yes
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Site Management</b>			
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. <b>- Major compliance -</b>	SOP has been established for the TDM Sg. Tong estates as a guidance for the operating units to conduct daily operations. The estates holds SOP as references to run the operation and documented in TDM Plantation Sdn. Bhd. Standard Operating Procedure - latest review was on May 2017.	Yes
<b>4.6.1.2</b>	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.	The SOP covered all the main and supporting operations i.e Boundary marking, Replanting at slope, Soil Conservation at slope area, Water management, Manuring, Weeding and Harvesting. Sighted the construction of silt pits to conserve moisture at terrace areas and mulching of palms base using EFB compost.	Yes



Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.6.1.3	A visual identification or reference system shall be established for each field.  - Major compliance -	From the site visit in TDM Sg. Tong estates, the implementation at:  - Jaya Estate visited field 2000 C7.  - Tayor Estate visited field 98A1.	Yes
<b>Criterion 4.6.2: Economic and financial viability plan</b>			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.  - Major compliance -	TDM Sg. Tong estates annual business plan and 5 years projection for 2020 – 2025 was established and document was available for review.  The plan was established as basis for TDM Sg. Tong estates to conduct the business.	Yes
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 -	The TDM Sg. Tong estates visited has established a 5 years replanting programme. The replanting programme was planned for tall palm and older than 25 years old as well as low production field.  Replanting programme as follow:  <u>Jaya Estate:</u> 2023 : 115.30 ha for year planting 1995 2024 : 115.30 ha for year planting 1995  <u>Tayor Estate:</u> 2020 : 198.70 ha for field 19A 2021 : 171.22 ha for field 95A	Yes

Criterion / Indicator		Assessment Findings	Compliance
		<p><u>Fikri Estate:</u>            2020 : 271.27 ha for year planting 1993            2021 : 374.21 ha for year planting 1994</p>	
<b>4.6.2.3</b>	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> <li>a) Attention to quality of planting materials and FFB</li> <li>b) Crop projection: site yield potential, age profile, FFB yield trends</li> <li>c) Cost of production: cost per tonne of FFB</li> <li>d) Price forecast</li> <li>e) e) Financial indicators: cost benefit, discounted cash flow, return on investment</li> </ul> <p><b>- Major compliance -</b></p>	<p>The business plan covers hectareage statement, FFB yield per Ha, CPO yield per Ha, PK yield per Ha, Mature area expenditures, Immature area expenditures, Capital Expenditures including crop projection for 2018, Cost of production/mt, and gross P&amp;L.</p>	Yes
<b>4.6.2.4</b>	<p>The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.</p> <p><b>- Major compliance -</b></p>	<p>TDM management has appointed an external party, Sime Darby Seeds and Agricultural Services Sdn Bhd to provide the Planting Advise to inspect and report on estate’s implementation of procedures.</p> <p>The Plantation Advisor report covers on crop quality, Manpower deployment, production performance, Quality of Input FFB, Quality of Palm Products, Process efficiency, Palm products storage and dispatch and Production Cost.</p> <p><u>Jaya Estate</u>            The latest visit conducted on 22-24/04/2017. Crop Actual: 61,808.13 tonnes (Budget: 75,000 tonnes); Conclusion: Good cost achieved at</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		marginally below budget. Further cost reduction is achievable by increasing yield and production.  <u>Tayor Estate</u> The latest visit conducted on 29-30/05/2019. Crop Actual: 10,833.16 tonnes (Budget: 7,080 tonnes); Conclusion: The crop performance showed a big surplus of 53.01% mainly from the cyclical FFB trend and the spill over of last years crop into the months of January and February this year.  <u>Fikri Estate</u> The latest visit conducted on 11-13/06/2019. Crop Actual: 21,208.01 tonnes (Budget: 18,500 tonnes); Conclusion: Recorded a crop deficit for May at 5.5% against budget mainly due to loss of harvesting days during Raya leave. The year to-date crop showed a surplus of 14.64%.	
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented.  <b>- Major compliance -</b>	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. Sampled of Work Order Agreement as below:  1. Jaya Estate: Work Order: 011/19 for rental of lorry to transport FFB from ramp to mill which valid until 31/12/2019.  2. Tayor Estate: Koperasi FELDA Kampung Rahmat Chalok Work Order: LT-43/19 for installation of replanting border at Tayor Estate which valid from 01.08.2019 until 31.08.2019.	Yes

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		3. Fikri Estate: Shamsul bin Mohammad Work Order: FK 09/19 for FFB transportation from Sentosa to Sungai Tong POM.	
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. <b>- Major compliance -</b>	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. Sampled below cash voucher: 1. Jaya Estate: PV No: 170/19, date: 07/07/2019, amount RM 4,446.60. 2. Tayor Estate: Reference No: JV 01463 date: 28/05/2019, amount RM 57,559.60. 3. Fikri Estate: PV 40/02 date: 11/02/2019 amount RM 8,458.97	Yes
<b>Criterion 4.6.4: Contractor</b>			
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. <b>- Major compliance -</b>	Additional requirements such as MSPO for the contractors to comply were stamped on the Work Order Agreement and it was signed by the contractors. Interviewed with the contractors confirmed that MSPO requirements and policies were explained to them.	Yes
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	The contractors have signed on the Work Order Agreement on monthly basis prior to provide services. Seen the Work Order Agreement and details refer to Criterion 3, Indicator 1.	Yes
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. <b>- Minor compliance -</b>	TDM Plantation Sdn Bhd has agreed for BSI auditors to verify the assessment through a physical inspection if required.	Yes

Criterion / Indicator		Assessment Findings	Compliance
<b>4.6.4.4</b>	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted.  - Major compliance -	The contractor will issue the FFB chit for every work done on daily basis as stated in the contract agreement. Estate will monitor the productivity through the Summary External Transport for transportation and Contractor Work Completion form during the month end, the contractor will issue the tax invoice to the company for all the work done to proceed for payment.	Yes

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

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	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.	Yes
<b>4.1.1.2</b>	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation.  - Major compliance -	For TDM Plantation Sdn. Bhd. (TDMP), an MSPO Policy has been established and authorized by the Chief Executive Officer dated 1/8/2017.	Yes
<b>Criterion 4.1.2 – Internal Audit</b>			

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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. <b>- Major compliance -</b>	Internal audit was planned as per 2019 MSPO/RSPO Compliance Audit Plan and conducted from 03/07/2019. 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.	Yes
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. <b>- Major compliance -</b>	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 sighted for the latest audit conducted on 03/07/2019. Sighted the Corrective Action Report on Non-compliance Findings on the analysis of nonconformity raised.	Yes
4.1.2.3	Reports shall be made available to the management for their review. <b>- Major compliance -</b>	Report made available for review in the management review meeting and recorded in the minutes under "Corrective Action Report of Non-Compliance Findings".	Yes
<b>Criterion 4.1.3 – Management Review</b>			
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. <b>- Major compliance -</b>	Latest management review conducted on 22/09/2019 as per records of minutes of meeting "Minit Mesyuarat Management Review (RSPO/MSPO) TDMP Kali Ke-2 02/2019".	Yes

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Criterion / Indicator	Assessment Findings	Compliance	
<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	<p>The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.</p> <p><b>- Major compliance -</b></p>	<p>The Continuous Improvement Plan FY2019/2020 (Sungai Tong Palm Oil Mill) reviewed on 04/08/2019 by both the Compliance Executive and Mill Manager was established in terms of social and environmental as per following samples:</p> <ul style="list-style-type: none"> <li>- Problem/Issues: Waste dumping; Action: Waste collection from Majlis Daerah Setiu (MDS) from 3R bin provided; Objective: To get clean surrounding and promote 3R program.</li> <li>- Problem/Issues: Bad housing condition; Action: To repair the houses condition/damage as needed; Objective: To supply better housing condition.</li> </ul>	<p>Yes</p>
<b>4.1.4.2</b>	<p>The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.</p> <p><b>- Major compliance -</b></p>	<p>TDM has established a plan to construct methane capture (biogas) plant for its POME treatment system. This system will be able to utilize the use of renewable energy further.</p> <p>TDM also plans to install the Boiler Particulate Emission System/Scrubber to reduce emission, maintain and achieve Boiler stack monitoring of &lt;150mg/m3.</p> <p>Both works are in initial award stages, expected to start work on 31/12/2019.</p>	<p>Yes</p>
<b>4.2 Principle 2: Transparency</b>			
<b>Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements</b>			

Criterion / Indicator		Assessment Findings	Compliance
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 -	Sg Tong 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.	Yes
4.2.1.2	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.  - Major compliance -	The information regarding sustainability and the company is available in website <a href="https://sustainability.tdmberhad.com.my/">https://sustainability.tdmberhad.com.my/</a> and also publicly available in each complex. Sighted the policies were displayed publicly in the office board.	Yes
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
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.	Yes
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 "Perlantikan Sebagai Wakil Syarikat Bagi Mengendalikan Isu Sosial Dengan Pihak Luar Di Peringkat Ladang/Kilang" from Group Senior Human Resource Manager; ref. # TDMP/HR/PSN-GEN/RSPO; dated 28/09/2017.	Yes
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained.  - Major compliance -	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 Sungai Tong POM.	Yes



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		Latest Stakeholder Meeting dated 23/7/2019 was conducted at Akademi TDM for the whole Sg. Tong Complex with the participation of internal and external stakeholders. Seen the meeting minutes and attendance list. No issue was raised during the meeting. Only questions and requests were raised and immediate replies from the management during the meeting.	
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. <b>- Major compliance -</b>	SOP on the traceability of the FFB has established and describe in the TDM Plantation Sdn. Bhd. MSPO Standard Operating Procedure dated 01/8/2017. The appointed PIC is Puan Norwati (reference: KL.KKS/3/10/07 dated 01.01.2017).	Yes
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system. <b>- Major compliance -</b>	Mill Engineer will verify the records related to the traceability of CPO & PK processed. Sighted the for the month of August 2019 for all dispatch.	Yes
<b>4.2.3.3</b>	The management shall identified and assign suitable employees to implement and maintain traceability system. <b>- Minor compliance -</b>	The Mill Manager has an overall responsibility for the traceability activities, eg: planning and executing sales of CPO & PK, aspects of FFB receipts, processing and shipping of palm products. Interview with the Mill Manager confirmed his knowledge of the MSPO traceability requirements.	Yes
<b>4.2.3.4</b>	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. <b>- Major compliance -</b>	Records of storage, sales, and delivery/transportation of both CPO and PK were maintained and updated on daily basis as part of mill production report.	Yes

Criterion / Indicator	Assessment Findings	Compliance	
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
<b>4.3.1.1</b>	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p><b>- Major compliance -</b></p>	<p>In STPOM, the management has comply with the regulation and applicable law such as per sampling below:-</p> <p>MPOB license no: 500042704000; 300,000 MT/Year; validity 01/04/2019 – 31/03/2020.</p> <p>DOE license no 004064 (Ref no: AS(B)T:31/152/000/008) for 60 MT/H capacity; validity 01/07/2019 – 30/06/2020.</p> <p>Fire Certificate no: JBPM:TR/7/05/2018; validity 02/04/2019 – 01/04/2020.</p> <p>Diesel license serial no: T 000009-BST (Ref: KPDNKK.BST.800-1/8/23/14); 20,000 capacity; validity 28/01/2019 – 27/01/2020.</p> <p>CePPOME competent person, En Muhammad Shahairie Bin Abdul Razak (CePPOME/182862) – has submitted the Field Training Report on 12/12/2018 and approval still in-progress (email dated 16/04/2019).</p> <p>CePSWAM competent person, Pn. Norwati Binti Mamat (CePSWAM/172052) – has attended the interview on 24/05/2019 and approval still in-progress.</p> <p>JTK Permit Approval:</p>	<p>Major non-conformities</p>

Criterion / Indicator		Assessment Findings	Compliance
		<p>1. Permohonan Had Kerja Lebih Masa Di Bawah Seksyen 60A(4)a Akta Kerja 1955 (Reference: BHG.PU/9/134 JLD 9 (60)dated 09 August 2017.</p> <p>2. Potongan Upah Di bawah Seksyen 24 Akta 1955 (Reference PTK/ST/600.2.2(3.2) dated 23/01/2013.</p> <p>However, some of the legal compliance is not effectively demonstrated as below:</p> <p>In Sungai Tong Palm Oil Mill, Azhar bin Mansor has been hired as contract workers for 3 months since 1 November 2017 continuously until now but didn't has the EPF contribution at all. This is not complying with the EMPLOYEES PROVIDENT FUND ACT 1991:</p> <p>Rate of contributions;</p> <p>43. (1) Subject to section 52, every employee and every employer of a person who is an employee within the meaning of this Act shall be liable to pay monthly contributions on the amount of wages for the month at the rate respectively set out in the Third Schedule.</p> <p>Definition: "employee" means any person, not being a person of the descriptions specified in the First Schedule, who is employed under a contract of service or apprenticeship, whether written or oral and whether expressed or implied, to work for an employer;</p> <p>2. In Sungai Tong Palm Oil Mill, the wages pay for Fatimah Osman on Jun 2019 was paid for 20 working days instead of his actual 21 working days. This is not complying with the Employment Act 1955.</p>	
<b>4.3.1.2</b>	The management shall list all relevant laws related to their	Legal Register Requirements 2019 was available and updated on September 2019; prepared by Pn. Norwati Binti Mamat (Compliance	Yes

Criterion / Indicator		Assessment Findings	Compliance
	operations in a legal requirements register. <b>- Major compliance -</b>	Executive), Reviewed by Asst Manager and verified by En Haji Shahbudin Bin Usop (Mill Manager).	
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. <b>- Major compliance -</b>	The legal register requirement has already been updated for the new amendments legal such as Noise Risk Assessment (to comply in 2020), Noise Exposure (Revocation) and Employment Insurance Scheme (EIS/SIP).	Yes
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. <b>- Minor compliance -</b>	The management already assigned Pn Norwati Binti Mamat (Letter of appointment ref: KL.KKS/3/10.07 dated 01/01/2017 to track and update the regulatory requirements in STPOM.	Yes
<b>Criterion 4.3.2 – Lands use rights</b>			
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. <b>- Major compliance -</b>	There is no land dispute in the Sungai Tong Certification units at the time of audit. The land belongs to TDM and land ownership documents verified.	Yes
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. <b>- Major compliance -</b>	As above, legal ownership (lease agreement) of land was provided by management during audit.  Sighted the following records:  1. Management Agreement between Kumpulan Ladang-ladang Trengganu Sdn Bhd and TDM Plantation Sdn Bhd dated 20/07/2016 (Duration: 5 years commencing from 01/01/2016 up to 31/12/2020).	Yes

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		2. State Land Title (Ownership no: 6521; Lot no: 7663; Area: 58.7685 hectar).	
<b>4.3.2.3</b>	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.  - <b>Major compliance</b> -	Mill building boundary surrounded by fences while the POME treatment area parameters boundary clearly demarcated and visibly maintained on the grounds.	Yes
<b>4.3.2.4</b>	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).  - <b>Minor compliance</b> -	There is no land dispute in the Sungai Tong Certification units at the time of audit. The land belongs to TDM and land ownership documents verified.	Yes
<b>Criterion 4.3.3 – Customary rights</b>			
<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.  - <b>Major compliance</b> -	No any lands encumbered by customary rights within TDM Sg. Tong complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	Yes
<b>4.3.3.2</b>	Maps of an appropriate scale showing extent of recognized customary rights shall be made available.  - <b>Minor compliance</b> -	No any lands encumbered by customary rights within TDM Sg. Tong complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	Yes
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available.  - <b>Major compliance</b> -	No any lands encumbered by customary rights within TDM Sg. Tong complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	Yes

Criterion / Indicator		Assessment Findings	Compliance
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.  - <b>Minor compliance</b> -	Initial Social Impact Assessment (SIA) Kompleks Sungai Tong; Report date: May 2012 by SRA Consultancy. Based on this initial assessment, action plan was established on annual basis as per sighted Action Plan Revision 2019/2020; Reviewed on 17/09/2019. 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.	Yes
<b>Criterion 4.4.2: Complaints and grievances</b>			
<b>4.4.2.1</b>	A system for dealing with complaints and grievances shall be established and documented.  - <b>Major compliance</b> -	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.	Yes
<b>4.4.2.2</b>	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties.  - <b>Major compliance</b> -	Based on Communication Record Logbooks, 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.	Yes
<b>4.4.2.3</b>	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.  - <b>Minor compliance</b> -	Communication Record Logbook for Linesite Repair and Complaint/ Request form was established and implemented. No external stakeholders were recorded related on complaint and grievances.	Yes

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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><b>- Minor compliance -</b></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>	Yes
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><b>- Major compliance -</b></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>	Yes
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
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><b>- Minor compliance -</b></p>	<p>Contributions were made as part of Continuous Improvement Plan FY2019/2020 Review on 4/08/2019. Sighted contributions were as following:</p> <p>a. Pupils transportation for Sunday till Thursday (Except Public Holiday).</p> <p>b. To build new Surau. Status is completed on 31.01.2018.</p>	Yes
<b>Criterion 4.4.4: Employees safety and health</b>			
4.4.4.1	<p>An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p><b>- Major compliance -</b></p>	<p>Sighted the TDM Berhad Occupational Safety &amp; Health Policy dated 27 March 2018, approved by the Board of Directors of TDM Berhad.</p> <p>The policy was communicated to all workers during the morning briefing and latest record was on 04/09/2019.</p>	Yes

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		Sighted also the memo ref: TDM/CC/01 dated 08/04/2018 to inform about the new policies approved by the Board.	
<b>4.4.4.2</b>	<p>The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risk of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:               <ul style="list-style-type: none"> <li>i. All employees involved are adequately trained on safe working practices;</li> <li>ii. All precautions attached to products should be properly observed and applied;</li> </ul> </li> <li>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).</li> <li>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</li> <li>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust</li> </ul>	<ul style="list-style-type: none"> <li>a) Sighted the TDM Berhad Occupational Safety &amp; Health Policy dated 27 March 2018, approved by the Board of Directors of TDM Berhad. The policy was communicated to all workers during the morning briefing and latest record was on 04/09/2019.</li> <li>b) HIRARC was established to include all the activities in the mill including construction sites. HIRARC register was last reviewed on 01/06/2019. No changes was recorded.</li> <li>c) Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE.</li> <li>d) Suitable PPE has been provided to the workers based on the information in the MSDS and CHRA assessor's recommendation.</li> <li>e) During the site visit, the PPE were adequately implemented. Eg: Ramp, Sterilizer Station, Press Station and Workshop.</li> <li>f) The management already assigned Pn Norwati Binti Mamat (Letter of appointment ref: KL.KKS/3/10.07 dated 01/01/2017 as the Safety Co-ordinator in STPOM.</li> </ul> <p>Emergency Response Team organization chart for 2019 available.</p>	Yes



Criterion / Indicator	Assessment Findings	Compliance
<p>shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept 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><b>- Major compliance -</b></p>	<p>g) OSH Committee was also available. OSH meeting was conducted quarterly. Sighted records for OSH meeting minutes dated 15/09/2019, 26/06/2019, 25/03/2019 and 16/12/2018.</p> <p>h) Accident and emergency procedures had been written and briefed to staff, workers, contractors and visitors.</p> <p>Fire drill was last conducted on 27/08/2019 to all STPOM workers, staff and executives.</p> <p>i) First aid boxes were available at worksite (sterilizer station). All items/contents in the first aid box were found adequate and not expired.</p> <p>First aid training was last conducted on 20/9/2018 by hospital assistant.</p> <p>j) Record of all accidents are well kept. Accident/incidences are reviewed during the safety meetings.</p> <p>Records on Lost Time Accident (LTA) metrics was maintained and based on JKKP 6, 7 &amp; 8.</p> <p>JKKP 6 submitted on 27/06/2018 and 08/07/2018. 2 accidents involving permanent disability was reported.</p> <p>JKKP 7 for STPOM was submitted to DOSH on 25/08/2019 (Exposed to noise at workplace), 02/06/2019 (Back injury).</p> <p>JKKP 8 for STPOM was submitted to DOSH on 23/01/2019.</p>	
<p><b>Criterion 4.4.5: Employment conditions</b></p>		

Criterion / Indicator		Assessment Findings	Compliance
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><b>- Major compliance -</b></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 04-10/09/2019 by phases in each gang during Monday morning briefing. The policies were displayed at the notice board outside the office.</p>	Yes
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><b>- Major compliance -</b></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 04-10/09/2019. The policies were displayed at the notice board outside the office.</p>	Yes
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>The management have ensured that employees' pay and conditions meet applicable legal requirements i.e. National Minimum Wages Order 2018. Sighted pay slips as below sampled workers:</p> <ul style="list-style-type: none"> <li>• Mohd Yunus Bin Ismail (Shovel Driver)</li> <li>• Roslan Bin Mohamad (Empty Bunch Conveyor)</li> <li>• Azhar Bin Mansor (Kilang Bio-Organik)</li> <li>• Fatimah Binti Osman (Kilang Bio-Organik)</li> </ul>	Yes
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><b>- Minor compliance -</b></p>	<p>There is no employee of contractors hired in TDM Sungai Tong POM. All workers are check roll workers.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
4.4.5.5	<p>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><b>- Major compliance -</b></p>	<p>There is (Plantware) Employee Details System used for a reference of 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.</p>	Yes
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p><b>- Major compliance -</b></p>	<p>Fair contracts have been signed by both employee and employer with both kept a copy each. Sample contract sighted as following:</p> <ul style="list-style-type: none"> <li>• Mohd Yunus Bin Ismail (Shovel Driver)</li> <li>• Roslan Bin Mohamad (Empty Bunch Conveyor)</li> <li>• Azhar Bin Mansor (Kilang Bio-Organik)</li> <li>• Fatimah Binti Osman (Kilang Bio-Organik)</li> </ul>	Yes
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p><b>- Major compliance -</b></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>	Yes
4.4.5.8	<p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p> <p><b>- Major compliance -</b></p>	<p>Working hours is 8 hours. From Monday to Saturday. The overtime maximum is 104 hours according to the Employment Act 1955. Mill has the JTK permit approval on overtime limit maximum of 140 hours.</p> <p>As at current status, there was none has crossed 100 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>	Yes

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		<ul style="list-style-type: none"> <li>- Sun - Thu – daily rated / 8 hours x 1.5</li> <li>- Friday - daily rated / 8 hours x 2.0</li> <li>- Public holiday – daily rated / 8 hours x 3.0</li> </ul>	
<b>4.4.5.9</b>	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p><b>- Major compliance -</b></p>	<p>Wages and overtime payment documented found consistent with legal regulations and collective agreements. Sighted payslips for following samples:</p> <ul style="list-style-type: none"> <li>• Mohd Yunus Bin Ismail (Shovel Driver)</li> <li>• Roslan Bin Mohamad (Empty Bunch Conveyor)</li> <li>• Azhar Bin Mansor (Kilang Bio-Organik)</li> <li>• Fatimah Binti Osman (Kilang Bio-Organik)</li> </ul>	Yes
<b>4.4.5.10</b>	<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><b>- Minor compliance -</b></p>	<p>Other forms of social benefits for workers are as following:</p> <ul style="list-style-type: none"> <li>• Free school transportation</li> <li>• Free medical care</li> <li>• Jawatankuasa Perkampungan for own saving</li> <li>• Raya Celebration on 01/07/2019.</li> <li>• Majlis Buka Puasa on 16/05/2019.</li> </ul>	Yes
<b>4.4.5.11</b>	<p>In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.</p> <p><b>- Major compliance -</b></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>	Yes
<b>4.4.5.12</b>	<p>The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p> <p><b>- Major compliance -</b></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>	Yes

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		Mill has its own gender committee and activities including meeting was conducted quarterly. Sighted the minutes meeting dated on 05/09/2019, 20/06/2019 and 20/03/2019.	
<b>4.4.5.13</b>	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.  <b>- Major compliance -</b>	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. Sighted the latest employee representative meeting as per records of minutes of meeting Mesyuarat Bersama Wakil Pekerja Sesi 2019; Date: 29/08/2019.	Yes
<b>4.4.5.14</b>	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.  <b>- Major compliance -</b>	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.	Yes
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.  <b>- Major compliance -</b>	STPOM has established an annual training program, STPOM Occupational Safety & Health Plan FY 2019/2020 that covers all aspects of the MSPO.	Yes

Criterion / Indicator		Assessment Findings	Compliance																								
		OSH Plan, Training Matrix and Training Schedule 2019/2020 (Reviewed on 20/01/2019) and training records were available for verification at STPOM.																									
<b>4.4.6.2</b>	<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><b>- Major compliance -</b></p>	<p>Training records for employees available and maintained at the office.</p> <p>Records were verified on a sampling basis, which covers all aspect of training and MSPO requirement.</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>18/09/2019</td> <td>Taklimat Skop Kerja Pekerja Penyelenggaraan (Bengkel &amp; Elektrik)</td> <td>STPOM</td> </tr> <tr> <td>11/09/2019</td> <td>Supply Chain Training</td> <td>STPOM</td> </tr> <tr> <td>10/09/2019</td> <td>RSPO &amp; MSPO Refresher &amp; Meeting</td> <td>STPOM</td> </tr> <tr> <td>28/08/2019</td> <td>First Aid Training</td> <td>STPOM</td> </tr> <tr> <td>16/07/2019</td> <td>Electrical System &amp; Turbine/Genset Station</td> <td>STPOM</td> </tr> <tr> <td>03/07/2019</td> <td>Latihan Pengendalian Bahan Kimia (Medical Surveillance)</td> <td>STPOM</td> </tr> <tr> <td>18/06/2019</td> <td>Local Exhaust Ventilation Training</td> <td>STPOM</td> </tr> </tbody> </table>	Date	Training	Remark	18/09/2019	Taklimat Skop Kerja Pekerja Penyelenggaraan (Bengkel & Elektrik)	STPOM	11/09/2019	Supply Chain Training	STPOM	10/09/2019	RSPO & MSPO Refresher & Meeting	STPOM	28/08/2019	First Aid Training	STPOM	16/07/2019	Electrical System & Turbine/Genset Station	STPOM	03/07/2019	Latihan Pengendalian Bahan Kimia (Medical Surveillance)	STPOM	18/06/2019	Local Exhaust Ventilation Training	STPOM	Yes
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Criterion / Indicator		Assessment Findings	Compliance
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><b>- Minor compliance -</b></p>	<p>The training programs are available for all employee according to their job function.</p> <p>It been documented in training record verified during audit.</p>	Yes
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			
4.5.1.1	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>Sighted the TDM Berhad Environment &amp; Biodiversity Policy dated 27 March 2018, approved by the Board of Directors of TDM Berhad.</p> <p>The policy was communicated to all workers during the morning briefing and latest record was on 04/09/2019. Sighted also the memo ref: TDM/CC/01 dated 08/04/2018 to inform about the new policies approved by the Board.</p> <p>Environmental Management Plan/Pollution Prevention Plan FY2019/2020 (STPOM) was available and last reviewed on 04/08/2019.</p>	Yes
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations</p> <p><b>- Major compliance -</b></p>	<p>Sighted the TDM Berhad Environment &amp; Biodiversity Policy dated 27 March 2018, approved by the Board of Directors of TDM Berhad.</p> <p>Environmental Management Plan/Pollution Prevention Plan FY2019/2020 (STPOM) was available.</p> <p>EIA has been established and documented in Environmental Aspect and Impact Identification and Environmental Impact Evaluation.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		<p>The latest review of STPOM Aspect and Impact Evaluation and Identification FY 2019/2020 conducted on 01/07/2019.</p> <p>The assessment covers all activities base on working station such as:</p> <ul style="list-style-type: none"> <li>i. Reception Station</li> <li>ii. Sterilizer Station</li> <li>iii. Clarification</li> <li>iv. Raw &amp; Treated Effluent Plant</li> <li>v. Boiler House Operation</li> </ul>	
<b>4.5.1.3</b>	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>As per the SOP established, all activities with significant impacts was documented in the Environmental Management Plan/Pollution Prevention Plan FY2019/2020 (STPOM) reviewed on 04/08/2019 where the mitigation measures were developed.</p> <p>In the management plan also stated the responsible person to ensure the implementation of the plan.</p> <p>Activities with significant impacts were determined by the score in Environmental Impact Evaluation.</p>	Yes
<b>4.5.1.4</b>	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p><b>- Minor compliance -</b></p>	<p>Reporting for POME results are in line with the mill's compliance schedule requirements.</p> <p>New establishment of EPMC @ Environmental Performance Monitoring Committee (operation level – mill) and ERCMC @</p>	Yes



Criterion / Indicator		Assessment Findings	Compliance
		<p>Environmental Regulatory Compliance Monitoring Committee (HQ level) shows the commitment towards continuous compliance.</p> <p>The monitoring records of the Environment Improvement Plan / Pollution Prevention Plan / Continuous Improvement Plan are available. The plan was reviewed annually.</p>	
<b>4.5.1.5</b>	<p>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.</p> <p><b>- Major compliance -</b></p>	<p>The awareness program and training was established for all workers to ensure that the environment issues are aware by the workers.</p> <p>Sighted training records:</p> <ul style="list-style-type: none"> <li>- Seminar Pematuhan Peraturan-Peraturan Kualiti Alam Sekeliling (Udara Bersih) 2014 &amp; Amalan Pengeluaran Bersin (Cleaner Production) on 10/04/2019.</li> <li>- Chemical handling, Boiler water treatment &amp; Raw water treatment training on 29/01/2019.</li> <li>- Latihan Pengendalian Bahan Kimia (Medical Surveillance) on 03/07/2019.</li> </ul>	Yes
<b>4.5.1.6</b>	<p>The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.</p> <p><b>- Major compliance -</b></p>	<p>EPMC @ Environmental Performance Monitoring Committee (operation level – mill). Records for EPMC meeting minutes were available for 15/09/2019, 26/06/2019 and 25/03/2019.</p> <p>ERCMC @ Environmental Regulatory Compliance Monitoring Committee (HQ level) shows the commitment towards continuous compliance. The ERCMC meeting is schedule for 30/09/2019 and will be attended by the Mill Manager and HQ representatives.</p>	Yes

Criterion / Indicator	Assessment Findings	Compliance	
<b>Criterion 4.5.2:</b> Efficiency of energy use and use of renewable energy			
<b>4.5.2.1</b>	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  <b>- Major compliance -</b>	The consumption of non-renewable energy is been optimized and closely monitored, to-date diesel usage per FFB is 1.638 l/Mt (Jan – Aug 2019).  From the interview from management team high usage because low in crop intake.	Yes
<b>4.5.2.2</b>	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.  <b>- Major compliance -</b>	The mill has established plan for improving the efficiency of the use of fossil fuel by planning to construct methane capture facilities. The biogas recovered will be utilized to generate energy.  The company have finished the contract interview stage and awarded to Concord Green Energy Sdn Bhd. Project is expected to start construction by December 2019 (pending DOE written consent. Sighted Letter to DOE (Ref: (01) PINDAAN KB/JAS/SGTONG/CESB dated 15/09/2019).	Yes
<b>4.5.2.3</b>	The use of renewable energy should be applied where possible.  <b>- Minor compliance -</b>	Additionally, the mill is using industrial waste, shell and fibre as boiler fuel.  Sighted the record of shell usage as follows: i. August 2019 – 884.59 MT ii. July 2019 – 958.69 MT iii. June 2019 – 980.48 MT	Yes

Criterion / Indicator		Assessment Findings	Compliance
		Sighted the record of fibre usage as follows: i. August 2019 – 1958.87 MT ii. July 2018 – 2024.15 MT iii. June 2019 – 980.48 MT	
<b>Criterion 4.5.3: Waste management and disposal</b>			
<b>4.5.3.1</b>	All waste products and sources of pollution shall be identified and documented.  <b>- Major compliance -</b>	STPOM has established Waste Management Action Plan FY 2019/2020.  The plan has identified the different types of waste generated, SW codes, location generated, actions/mitigation plan to be taken and person responsible for each plan.	Yes
<b>4.5.3.2</b>	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for: 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.  <b>- Major compliance -</b>	STPOM has established Waste Management Action Plan FY 2019/2020 (reviewed on 08/02/2019) and the document was available for review.  Sighted the implementation of plan as follows: i. Sighted the inventory of SW generated for the month June, July & September 2019.  ii. Sighted the disposal records for SW 410 (C/N no: 20190728144YMPVF) & SW305 (C/N no: 2019072814TEA98D) dated 25/07/2019.	Yes
<b>4.5.3.3</b>	The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under	Mill has established monitoring method for Scheduled waste inventory. In the inventory form stated the date of SW generated,	Major non-conformity

Criterion / Indicator		Assessment Findings	Compliance
	<p>Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p><b>- Major compliance -</b></p>	<p>type of SW, and quantity generated. The date of SW generated also displayed at the SW store.</p> <p>Sighted the inventory form for SW410 and SW305 for the month of June, July &amp; September 2019. The inventory was also send to DOE through E-SWISS. Sighted the E-SWISS 5th Scheduled form for the month of June, July &amp; September 2019.</p> <p>Schedule waste dispose through licensed contractor: Pentas Flora (Kelantan) Sdn Bhd (DOE License no: 004878; validity 01/05/2019 – 30/04/2020).</p> <p>Latest records of consignment note for schedule wastes:</p> <ul style="list-style-type: none"> <li>- SW 410 (C/N no: 20190728144YMPVF) dated 25/07/2019</li> <li>- SW305 (C/N no: 2019072814TEA98D) dated 25/07/2019</li> </ul> <p><b>NC</b></p> <p><b>Sighted traced of oil spills/residues evident on the grounds in the surrounding areas of the workshop.</b></p>	
<b>4.5.3.4</b>	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p> <p><b>- Minor compliance -</b></p>	<p>Domestic waste is disposed by Majlis Daerah Setiu (MDS).</p> <p>Collection by MDS is 3 times per week (Sunday, Tuesday &amp; Thursday).</p>	Yes
<b>Criterion 4.5.4: Reduction of pollution and emission</b>			
<b>4.5.4.1</b>	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot</p>	<p>Environmental Management Plan/Pollution Prevention Plan FY2019/2020 (STPOM) was available.</p>	Yes

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	emissions, scheduled wastes, solid wastes and effluent. <b>- Major compliance -</b>	EIA has been established and documented in Environmental Aspect and Impact Identification and Environmental Impact Evaluation.  The latest review of STPOM Aspect and Impact Evaluation and Identification FY 2019/2020 conducted on 01/07/2019 by the Compliance Executive, verified by the Assistant Manager and approved by the Mill Manager.  The assessment includes pollution by greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.	
<b>4.5.4.2</b>	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. <b>- Major compliance -</b>	The polluting activities identified in the Environmental Aspect and Impact assessment. Various monitoring has been conducted including the effluent analysis, stack monitoring and river water monitoring.  For continuous emission reporting system, it always online and send to HQ of Department of Environment in Putrajaya. Calibration dated 12/09/2019.  Measurement of dust particulate concentration of Stack 1- Boiler (TG PMD 424).  Sighted the monitoring report ref no: L-GB-TC1902CSN-0444 reporting dated 12/03/2019 (sampling dated 27/02/2019) by Environmental Science (M) Sdn Bhd.  The monitoring result indicated at 0.3760 gm/Nm3, lower than the permissible limit of 0.4 gm/Nm3 stipulated under the Environmental Quality (Clean Air) Regulations, 1978.	Yes

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<b>4.5.4.3</b>	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p><b>- Major compliance -</b></p>	<p>The POME analysis conducted by third party - ERALab (KT) Sdn Bhd and all results complies with standard as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977.</p> <p>Noted the following reports:-</p> <p>i. Lab Report no: 19/08/W0760; Date of sampling: 28/08/2019; pH: 8.0; BOD: 45 mg/L; Suspended Solid: 62 mg/L; Nitrogen: 18.4mg/L; Oil &amp; grease: 1mg/L.</p> <p>ii. Lab Report no: 19/06/W0522; Date of sampling: 23/06/2019; pH: 7.3; BOD: 52 mg/L; Suspended Solid: 67 mg/L; Nitrogen: 20.3mg/L; Oil &amp; grease: 1mg/L.</p> <p>iii. Lab Report no: 19/05/W0451; Date of sampling: 29/05/2019; pH: 8.8; BOD: 48 mg/L; Suspended Solid: 32 mg/L; Nitrogen: 72.7mg/L; Oil &amp; grease: 3mg/L.</p>	Yes
<b>Criterion 4.5.5: Natural water resources</b>			
<b>4.5.5.1</b>	<p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <p>a) Assessment of water usage and sources.</p> <p>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</p>	<p>STPOM Water Management Plan: Contingency during water shortage FY 2019/2020 has been established and documented. The latest reviewed was conducted on 06/04/2019.</p> <p>The plan identified the issues of concern, mitigation plan, resource, person responsible and time plan. The management plan focusing on issues during shortage of water supply / dry spell source and water pollution.</p>	Yes

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	<p>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> <p><b>- Major compliance -</b></p>	<p>Sighted STPOM action plan for reduction of water usage FY2019/2020; reviewed on 06/04/2019; prepared by the Compliance Executive and Approved by the Mill Manager.</p> <p>The action plan also include water reduction program such as rainwater collection, air conditioner water collection, decanter - separator using too much water and purifier using water for cleaning in place (CIP).</p>	
<b>4.5.5.2</b>	<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><b>- Major compliance -</b></p>	<p>The effluent analysis conducted by third party and submitted the quarterly return form to DOE every 3 months through OER (Online Environmental Report in the) and all the parameters have confirm to parameters limit for watercourse discharge.</p> <p>Sighted quarterly return form records for:</p> <ul style="list-style-type: none"> <li>- 1<sup>st</sup> quarter (1 Jan – 31 Mac 2019) Total CPO produced: 8872.59 MT; Total FFB processed: 46682.83 MT; Total metered/estimated water consumption: 156820 m3.</li> <li>- 2<sup>nd</sup> quarter (1 Apr – 31 Jun 2019) Total CPO produced: 8295.94 MT; Total FFB processed: 43352.84 MT; Total metered/estimated water consumption: 209300 m3.</li> </ul>	Yes
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Mill Management</b>			
<b>4.6.1.1</b>	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p>	<p>SOP has been established for the Palm Oil Mill as a guidance for the operating units to conduct daily operations.</p>	Yes

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	- <b>Major compliance</b> -	<p>i. Mill Standard Operating Procedure and Operation Manuals, TDM/STPOM/01 rev. 01/2011 issued on 11 May 2011 which covers mill operations by stations i.e Reception station, sterilization station, kernel recovery, water treatment plant, Laboratory, product quality and HIRARC.</p> <p>ii. Sustainability Standard Operating Procedure which covers sustainability management procedure i.e Water sampling, flood management, OSH committee, complaint, communication and handling of scheduled waste.</p>	
<b>4.6.1.2</b>	All palm oil mills shall implement best practices. - <b>Major compliance</b> -	<p>The management has appointed an external party, Sime Darby Seeds and Agricultural Services Sdn Bhd to provide the External Mill Advisor to inspect and report on mill's implementation of procedures.</p> <p>The latest visit conducted on 10-11/06/2018 (Report no: TDM/ST/01/2017-18).</p> <p>The Mill Advisor report covers on OER &amp; KER achievements, mill throughput, plant &amp; machinery, oil &amp; kernel quality, mentoring and MA visit task.</p>	Yes
<b>Criterion 4.6.2:</b> Economic and financial viability plan			
<b>4.6.2.1</b>	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - <b>Major compliance</b> -	<p>Annual business plan and 5 years for 2019 – 2024 projection was established and document was available for review.</p> <p>The plan was established as basis for the company and operating units to conduct the business.</p>	Yes

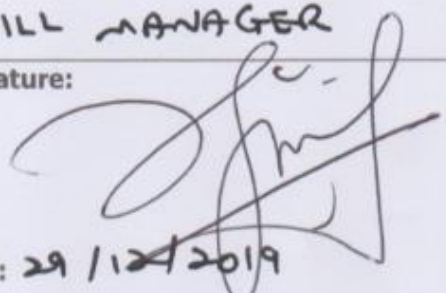
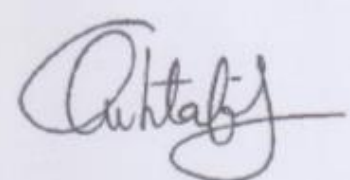


Criterion / Indicator		Assessment Findings	Compliance
		The business plan covers the FFB production, CPO, OER, and KER, general charges, mill maintenance, process shift labour, general services, and total processing cost.	
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented. <b>- Major compliance -</b>	Sungai Tong POM has received FFB crop from weighing center and independent smallholder. The pricing of FFB was displayed at the weighbridge area.	Yes
<b>4.6.3.2</b>	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. <b>- Major compliance -</b>	Contracts are fair, legal and transparent as per Sampled of contract agreement with the contractors as below: - Company: Koperasi Ladang Sungai Tong Terengganu Berhad for transporting CPO and PK which valid until 31/12/2019 The term for payment has agreed by both parties which is 30 days from the date of receipt of invoice from contractors. Document verified the invoices and payment vouchers confirmed that payment was made accordingly. Sampled of invoice and payment voucher as below: <ul style="list-style-type: none"> <li>• Invoice Koperasi Ladang Sungai Tong Terengganu Berhad (Ref letter: KOOP-INV(07.19) dated 18.08.2019.</li> <li>• Invoice from TDM Plantations Sdn Bhd (Bil: BKTO.09/09/19) dated 21.08.2019 for RM 4,407.07 (after penalty).</li> </ul>	Yes
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	In case of the engagement of contractors, they shall be made to	Additional requirements such as MSPO for the contractors to comply were stamped on the Work Order Agreement and it was	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	<p>understand the MSPO requirements and shall provide the required documentation and information.</p> <p><b>- Major compliance -</b></p>	<p>signed by the contractors. Interviewed with the contractors confirmed that MSPO requirements and policies were explained to them. Sampled for FA Sama Trading (Perjanjian Pesanan Kerja) Bil: STOM 61/19 dated 02/03/2019.</p> <p>Also, during the stakeholder meeting, the contractors were briefed in regards with MSPO on 23/7/2019.</p>	
<b>4.6.4.2</b>	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p><b>- Major compliance -</b></p>	<p>The contractors have signed on the Work Order Agreement on monthly basis prior to provide services. Sampled for FA Sama Trading (Perjanjian Pesanan Kerja) Bil: STOM 61/19 dated 02/03/2019.</p>	Yes
<b>4.6.4.3</b>	<p>The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.</p> <p><b>- Minor compliance -</b></p>	<p>TDM Plantation Sdn Bhd has agreed for BSI auditors to verify the assessment through a physical inspection if required.</p>	Yes

**Section 4: Assessment Conclusion and Recommendation**

<b>Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings</b>	
Based on the findings during the assessment <b>TDM Plantation Berhad-Sungai Tong POM</b> Certification Unit complies with the <b>MS 2530-3:2013 and MS 2530-4:2013</b> . It is recommended that the certification of <b>TDM Plantation Berhad-Sungai Tong POM</b> Certification Unit is approved and/or continued.	
<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<b>Name:</b> HAJI SHAHBUDIN BIN USOP PENGURUS KILANG KELAPA SAWIT SUNGAI TONG, 21500 SETIU,	<b>Name:</b> Elzy Ovktafia Chairul
<b>Company name:</b> TERENGGANU TDM PLANTATION SON. BHD.	<b>Company name:</b> BSI Services Malaysia Sdn. Bhd.
<b>Title:</b> MILL MANAGER	<b>Title:</b> Client Manager
<b>Signature:</b>  <b>Date:</b> 29 / 12 / 2019	<b>Signature:</b>  <b>Date:</b> 27/12/2019

### Appendix A: Assessment Plan

Date	Time	Subjects	EO	DF
Sunday 22/09/2019	PM	Travel to Kuala Terengganu & Check-in @ TH Hotel.	√	√
Monday 23/09/2019	0830–0900	Opening Meeting (Sg. Tong Palm Oil Mill) <ul style="list-style-type: none"> <li>➢ Presentation by TDM Sg. Tong</li> <li>➢ Presentation by BSI Lead Auditor -introduction of team member and assessment agenda</li> <li>➢ Confirmation of assessment scope and finalizing audit scope</li> </ul>	√	√
	0900–1230	<b>Sg. Tong Palm Oil Mill</b> 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.	√	√
	1230–1330	Lunch / Break	√	√
	1330–1700	<b>Sg. Tong Palm Oil Mill</b> Document Review (MS2530 Part 4), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices.	√	√
	1430–1530	<b>Sg. Tong Palm Oil Mill</b> Stakeholder meeting	√	-
	1700–1730	Interim closing meeting	√	√
Tuesday 24/09/2019	0830–1230	<b>Jaya Estate</b> 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.	√	√
	1030-1200	<b>Jaya Estate</b> Stakeholder meeting	√	-
	1230–1330	Lunch / Break	√	√
	1330–1700	<b>Jaya Estate</b> 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.	√	√
	1700–1730	Interim closing meeting	√	√
Wednesday 25/09/2019	0830–1230	<b>Fikri Estate</b> 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.	√	√

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Date	Time	Subjects	EO	DF
	1230–1330	Lunch / Break	√	√
	1330–1700	<b>Fikri Estate</b> 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.	√	√
Thursday 26/09/2019	0830–1230	<b>Tayor Estate</b> 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.	√	√
	1230–1330	Lunch / Break	√	√
	1330-1530	<b>Tayor Estate</b> 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.	√	√
	1530–1630	Group discussion and preparation for closing meeting	√	√
	1630–1730	Closing meeting	√	√

**Appendix B: List of Stakeholders Contacted**

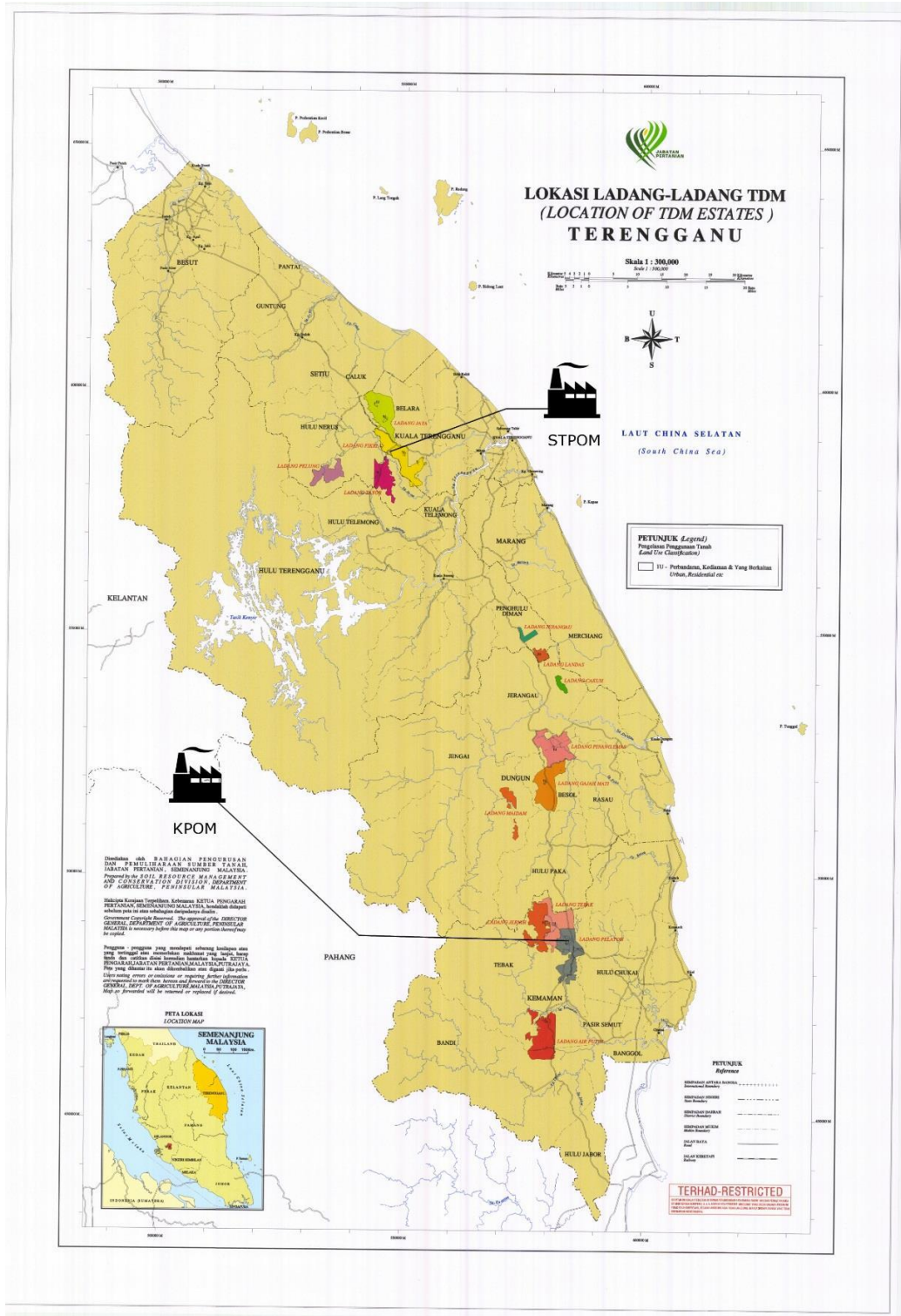
<p><b>Government Officer:</b>          Sekolah Kebangsaan Fikri          Sekolah Kebangsaan Kampung Tayor          Koperasi PEMINT</p>	<p><b>Community/neighbouring village:</b>          MPKK Kampung Selamat          Kampung Tayor Tengah</p>
<p><b>Suppliers/Contractors/Vendors:</b>          Transporter (Pelung Estate)          Sin Joo Tak Trading Sdn Bhd          Kedai Hardware</p>	<p><b>Worker’s Representative/Gender Committee:</b>          Ladang Tayor          Ladang Fikri          Ladang Jaya          Ladang Pelung          Sungai Tong POM</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				
<b>TOTAL</b>				

**Appendix F: Location and Field Map**

**Sungai Tong Palm Oil Mill**











**Appendix G: List of Abbreviations**

BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MSPO	Malaysian Sustainable Palm Oil
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RTE	Rare, Threatened or Endangered species
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure