

**MALAYSIAN SUSTAINABLE PALM OIL
- ANNUAL SURVEILLANCE ASSESSMENT (ASA 3)
Public Summary Report**

Sime Darby Plantation Berhad
Client Company Address: Level 3A, Main Block Plantation Tower No. 2, Jalan P.J.U 1A/7, 47301 Ara Damansara Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 1) - Sg Dingin Palm Oil Mill & Sg Dingin Estate, Padang Buluh Estate, Bukit Selarong Estate, Anak Kulim Estate, Bukit Hijau Estate, Jentayu Estate, and Somme Estate Location of Certification Unit: Jalan Mahang-Kelang Lama, 09700 Karangan, Kedah, Malaysia

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Report Number: 3293282

Assessment Conducted by:
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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	Sime Darby Plantation Berhad		
Mill/Estate	MPOB License No.	Expiry Date	
	Sg Dingin Palm Oil Mill - 530978004000	30/06/2021	
	Sg Dingin Estate - 528696002000	31/03/2022	
	Padang Buluh Estate - 529234002000	30/04/2022	
	Bukit Selarong Estate - 525104002000	30/11/2021	
	Anak Kulim Estate - 524669002000	31/10/2021	
	Bukit Hijau Estate - 524461002000	31/10/2021	
	Jentayu Estate - 523647002000	30/09/2021	
	Somme Estate - 524666002000	30/10/2021	
Address	Head Office: Level 3A, Main Block Plantation Tower, No. 2, Jalan P.J.U 1A/7 47301 Ara Damansara Selangor, Malaysia		
Certification Unit	Sg Dingin Palm Oil Mill (SOU1) Jalan Mahang-Kelang Lama, 09700 Karangan, Kedah, Malaysia		
Contact Person Name	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Subramaniam a/l Govindasamy (Mill Manager)		
Website	www.simedarbyplantation.com	E-mail	shylaja.vasudevan@simedarbyplantation.com
Telephone	+603 78484379 (Head Office) +603 5940178 (Mill)	Facsimile	+603 78484363 (Head Office) +603 5940167 (Mill)

1.2 Certification Information			
Certificate Number	Palm Oil Mill: MSPO 705584 Plantations: MSPO 705628		
Issue Date	15/02/2018	Issue Date	14/02/2023
Scope of Certification	Palm Oil Mill: Production of Sustainable Palm Oil and Palm Oil Products Plantations: Production of Sustainable Oil Palm Fruits		
Standard	1) MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholders 2) MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills		
Stage 1 Date	N/A (The certification unit is RSPO Certified)		

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Stage 2 / Initial Assessment Visit Date (IAV)	31/10 - 02/11/2017		
Continuous Assessment Visit Date (CAV) 1	11 - 14/02/2019		
Continuous Assessment Visit Date (CAV) 2	29/06 - 01/07/2020		
Continuous Assessment Visit Date (CAV) 3	19 - 22/04/2021		
Continuous Assessment Visit Date (CAV) 4	TBA		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 550179	RSPO P&C MY-NI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E)	BSI Services Malaysia Sdn. Bhd.	11/08/2025
MSPO 717859	MSPO Supply Chain Certification Standard: 2018	BSI Services Malaysia Sdn. Bhd.	23/10/2024

1.3 Location of Certification Unit			
Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Sg Dingin Palm Oil Mill	Jalan Mahang-Kelang Lama, 09700 Karangan, Kedah, Malaysia	5° 23' 38.4" N	100° 42' 34.6" E
Sg Dingin Estate	Jalan Mahang-Kelang Lama, 09700 Karangan, Kedah, Malaysia	5° 21' 56.0" N	100° 42' 28.6" E
Padang Buluh Estate	Jalan Sidam Kiri, Sungai Petani, Kedah, Malaysia	5° 34' 25.4" N	100° 34' 25.1" E
Bukit Selarong Estate	Jalan Ladang Bukit Selarong, Padang Serai, Kedah, Malaysia	5° 28' 45.1" N	100° 35' 50.6" E
Anak Kulim Estate	Jalan Kulim - Serdang, Kulim, Kedah, Malaysia	5° 18' 34.6" N	100° 36' 13.8" E
Bukit Hijau Estate	Jalan Kuala Tawar - Sedim, Kuala Ketil, Kedah, Malaysia	5° 33' 03.8" N	100° 45' 25.6" E
Jentayu Estate	K 17, Sungai Petani Kedah, Malaysia	5° 45' 56.8" N	100° 37' 55.8" E
Somme Estate	Jalan Terap - Serdang, Serdang, Kedah, Malaysia	5° 15' 05.8" N	100° 36' 13.0" E

1.4 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Sg Dingin Estate	2,928.17	3.56	1,312.30	4,244.03	69.00
Padang Buluh Estate	3,447.00	14.34	547.13	4,008.47	85.99
Bukit Selarong Estate	3,639.64	34.24	222.29	3,896.17	93.42
Anak Kulim Estate	388.33	1.72	1,132.44	1,522.49	25.51
Bukit Hijau Estate	1,442.10	5.33	1,277.57	2,725.00	52.93
Jentayu Estate	1,191.04	0.71	986.84	2,178.59	54.67
Somme Estate	808.39	0.00	133.17	941.56	85.86
Total	13,844.67	59.9	5,611.74	19,516.31	66.78

Remarks:
 Bukit Hijau Estate: Total planted reduced 8.52Ha based on survey conducted by Precision Agriculture Unit (PAU) on July 2019. Add 8.52Ha at Infrastructure & others based on survey conducted by PAU.
 Somme Estate: Total Planted increase 37.67Ha based on survey conducted by GPS Team on May 2020, after previously declared 25Degree area no longer in category & converted to planted area.
 Bukit Selarong Estate: Total planted reduced 29.4Ha due land acquisition (Field: 1998B & 1999A) by Globalview Properties Sdn.Bhd on Feb 2020.

1.5 Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Sg Dingin Estate	435.74	599.90	771.59	1,079.86	41.08	2,492.43	435.74
Padang Buluh Estate	545.00	882.00	1,671.00	349.00	0.00	2,902.00	545.00
Bukit Selarong	765.62	612.81	555.76	1,695.45	10.00	2,874.02	765.62
Anak Kulim Estate	181.68	0.00	207.51	0.00	0.00	207.51	181.68
Bukit Hijau Estate	254.72	166.66	716.97	303.75	0.00	1,187.38	254.72
Jentayu Estate	138.02	0.00	683.62	369.40	0.00	1,053.02	138.02
Somme Estate	222.76	184.38	316.62	84.63	0.00	585.63	222.76
Total (ha)	2,543.54	2,445.75	4,923.07	3,882.09	51.08	11,301.99	2,543.54

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1.6 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (July 2020 - June 2021)	Actual (July 2020 - March 2021)	Forecast (July 2021 - June 2022)
Sg Dingin Estate	54,057.00	31,819.46	46,601.52
Padang Buluh Estate	67,000.00	32,324.24	70,621.00
Bukit Selarong	69,066.00	28,363.93	57,976.18
Anak Kulim Estate	3,300.00	2,366.33	3,132.00
Bukit Hijau Estate	24,500.00	10,057.31	19,071.29
Jentayu Estate	24,507.00	9,888.89	18,414.00
Somme Estate	24,507.00	8,451.59	11,880.667
Bukit Sembilan (Genting)	146.90	1,504.45	1,430.00
Holyrood	2,633.53	12,784.49	12,000.00
Tali Ayer	-	349.99	450.00
Chersonase	-	316.82	400.00
Kalumpong	-	267.66	320.00
Total	221,042.57	138,495.16	242,296.66

1.7 Uncertified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (July 2020 - June 2021)	Actual (July 2020 - March 2021)	Forecast (July 2021 - June 2022)
Tang Tatt	-	14509.54	-
Ck Teik	-	7431.61	-
FELCRA Berhad	-	1179.09	-
FELCRA Malau	-	3858.79	-
KPSM	-	66.23	-
Boleh Jadi	-	117.61	-
Tentu Mewah	-	232.93	-
Total		27,395.80	

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1.8 Certified Tonnage			
	Estimated (July 2020 - June 2021)	Actual (July 2020 - March 2021)	Forecast (July 2021 - June 2022)
	FFB	FFB	FFB
Mill Capacity: 80 MT/hr	255,930.00	138,495.16	227,696.66
SCC Model: MB	CPO (OER: 21.78 %)	CPO (OER: 21.17 %)	CPO (OER: 21.65 %)
	55,741.55	29,320.75	49,296.33
	PK (KER: 5.80 %)	PK (KER: 5.60 %)	PK (KER: 5.66 %)
	14,843.94	7,760.33	12,887.63

1.9 Actual Sold Volume (CPO)					
CPO (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
29,320.75			1,017.86	27,809.37	28,827.23

1.10 Actual Sold Volume (PK)					
PK (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
7,760.33			619.80	7,055.74	7,675.54

Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 190 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 19-22/04/2021. The audit programme is included as Section 2.3. The approach to the audit was to treat the SD SOU 1 Sg Dingin POM and Supply Bases 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 or smallholders sample were determined based on formula $S = r\sqrt{n}$ where n is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula $(r\sqrt{n})$; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix C.

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

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

Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Sg Dingin POM	√	√	√	√	√
Somme Estate		√		√	
Anak Kulim Estate		√			√
Bukit Hijau Estate		√		√	
Sg Dingin Estate			√		√
Bukit Selarong Estate				√	
Padang Buloh Estate			√		
Jentayu Estate			√		√

Tentative Date of Next Visit: March 3, 2022 - March 4, 2022

Total No. of Mandays: 8 mandays

2.1 BSI Assessment Team

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Nor Halis Abu Zar	Team Leader	He holds Bachelor of Science, Plantation Technology and Management, graduated from Universiti Teknologi Mara. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, He had accumulated more than 6 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. He is a qualified Lead Auditor for MS2530:2013 and has accumulated more than 300 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia. He has completed ISO IMS 9001, 14001 Lead Auditor Course in January 2019, MSP0 2530:2013 Lead Auditor Course in February 2019 and endorsed RSPO Lead Auditor Course in October 2020. Fluent in Bahasa Malaysia and English languages. During this assessment, he assessed on the aspects of policy and commitment, social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, stakeholder consultation, legal requirements, land & legal issue and MSP0 requirements.

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Mohd Fitri Mustafa	Team member	<p>Graduate in degree of agribusiness with more than 8 years working experience in various plantation company and skills in Good Agricultural Practices (GAP) including Integrated Pest Management (IPM).</p> <p>Involved in ISCC and MSPO auditing since September 2017. Qualified as Lead Auditor/Auditor for MSPO, RSPO and ISO 9001. Completed and certified MSPO Auditor course in 2018 held by SGS (M) Sdn Bhd. Fluent in Bahasa Malaysia and English languages. During this assessment, he assessed on the aspects of occupation health safety requirement, HIRARC, environment responsibility, training, legal requirements, land & legal issue, natural and biodiversity conservation, waste management, GHG, HCV, environment impact assessment and management plan, supply chain, general custody of chain, rules on market communications & claims and MSPO requirements.</p>
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2.2 Accompanying Persons

No.	Name	Role
	Nil	

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects	(NHA)	(MFM)
Sunday, 18/04/2021	-	Travelling from Kuala Lumpur to Sunway Hotel, Seberang Jaya	√	√
Monday, 19/04/2021 Somme Estate	08:30 - 09:00	Opening Meeting <ul style="list-style-type: none"> • Presentation by BSI Lead Auditor - introduction of team member and assessment agenda • Confirmation of assessment scope and finalizing audit scope 	√	
	09:00 - 12:30	Estate assessment: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√
	12:30 - 13:30	Lunch break	√	√
	13:30 - 16:30	Document Review (MS2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6 : Best practices Best practices, P7: Development of New Planting	√	√
	16:30 - 17:00	Interim closing meeting	√	√

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Date	Time	Subjects	(NHA)	(MFM)
Tuesday, 20/04/2021 Sg Dingin POM	09:00 - 12:30	Mill Assessment: Plant visit, FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√
	10:00 - 12:00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	
	12:30 - 13:30	Lunch break	√	√
	13:30 - 16:30	Document review (MS2530:2011 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 and P6 : Best practices,	√	√
	16:30 - 17:00	Interim closing meeting	√	√
Wednesday, 21/04/2021 Bukit Hijau Estate	09:00 - 12:30	Estate assessment: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√
	12:30 - 13:30	Lunch break	√	√
	13:30 - 16:30	Document Review (MS2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6 : Best practices Best practices, P7: Development of New Planting	√	√
	16:30 - 17:00	Interim closing meeting	√	
Thursday, 22/04/2021 Bukit Selarong Estate	09:00 - 12:30	Estate assessment: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√
	12:30 - 13:30	Lunch break	√	√

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Date	Time	Subjects	(NHA)	(MFM)
	13:30 - 16:30	Document Review (MS2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6 : Best practices Best practices, P7: Development of New Planting	√	√
	16:30 - 17:00	Assessment team discussion and preparation and closing meeting	√	√

Section 3: Assessment Findings

3.1 Details of audit results

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

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

3.2 Details of Nonconformities and Opportunity for improvement

The nonconformity is listed below.

During the Certification Assessment there were 0 major, 1 minor nonconformities and 3 OFI’s raised. The SOU 1 Sg Dingin POM and Estate 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 Non-conformity(ies) has been verified for its effectiveness and closed accordingly.

Minor Nonconformities:		
Ref: 2047686-202104-N1	Area/Process: Bukit Hijau Estate	Clause: 4.4.2.2 Part 3
	Issue Date: 22.04.2021	Due Date: Next Surveillance
Requirements:	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.	
Statement of Nonconformity:	There is no evidence that internal complaint has been solved in timely manner.	
Objective Evidence:	Sighted complaint record at Somme Estate and Bukit Selarong Estate. Refer Complaint Book and Housing Defect Record. There is evidence of issue has been resolved. However, during document checking at Bukit Hijau Estate, it was found there is no record of feedback and action taken of 1 complaint dated 30/03/2021 that against Standard Operating Manual “Flowchart and Procedure on Handling Issue” dated 01/04/2008 Section 6.3.	
Corrections:	Update the feedback and action taken of complaint, brief to new person in charge regarding the procedure internal/external communication.	
Root cause analysis:	Record of feedback and action taken not updated due to interchange of new person in charge.	
Corrective Actions:	Estate management to monitor/follow up the external and internal complaint, keep update the progress to the complainant, Estate Management review complaint logbook regularly (weekly basis) and verify by Asst. Manager and to response/reply within 14 days as per SDP SOP. RSQM-NTR to conduct training regarding the procedure for internal/external communication.	

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Assessment Conclusion:	Corrective action plan accepted. The effectiveness of corrective action will be verified during next surveillance audit.
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Opportunity For Improvement		
Ref: 2047686-202104-I1	Area/Process: Sg Dingin POM	Clause: 4.4.4.2 Part 4
Objective Evidence:	Mill management could improve of PPE awareness and usage while carried out task or job from outsiders.	

Opportunity For Improvement		
Ref: 2047686-202104-I2	Area/Process: Somme Estate and Bukit Selarong Estate	Clause: 4.4.2.4 Part 3
Objective Evidence:	Management could improve on additional training for stakeholders regarding complaint procedure for enhancing their awareness.	

Opportunity For Improvement		
Ref: 2047686-202104-I3	Area/Process: Somme Estate and Bukit Selarong Estate	Clause: 4.5.3.2 Part 3
Objective Evidence:	Implementation of managing used inner plastic bag of fertilizer could be improved in the field area.	

Noteworthy Positive Comments	
1	Good cooperation from the management team in facilitation the assessment.
2	Good relationship being maintained with surrounding communities.

3.3 Status of Nonconformities Previously Identified and OFI

Minor Nonconformities:		
Ref:1924804-202001-N1	Area/Process: Sg Dingin POM and Supply Bases	Clause: 4.4.5.4 Part 3
	Issue Date: 02/07/2020	Date of closure: 22/04/2021
Requirements:	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.	
Statement of Nonconformity:	Employment contract and salary for employees of contractor was not effectively monitored based on legal or industry minimum standards.	
Objective Evidence:	Sg Dingin Estate Monthly wage payment slip for March, April and May 2020 for Noor Azizah Sedim Enterprise's workers were checked. It was found that basic pay was not in accordance to Minimum Wages Order 2020. Workers with ID (#####,#####,#####,##### and #####) were still receiving RM1,100 basic pay.	
Corrections:	Estate to monitor minimum wages of contractor's employee RM1200 by payslip and ensure the outstanding areas were paid accordingly	

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Root cause analysis:	Estate had informed regarding minimum wages and Contractor not able to follow up due to MCO constraint as lot of Government agencies office closed
Corrective Actions:	Estate to ensure contractor submit a copy of new employment contract that follow minimum wages
Assessment Conclusion:	Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next surveillance assessment.
Verification Statement	<p>Document verification during ASA 3:</p> <p>Somme Estate</p> <p>Sighted contract agreement External Transport FFB from Somme to SDM Document number 4300536713 dated 01/04/2021. The contact validity updated on monthly basis. Reviewed the 2-employment contract for the contractor’s workers from Zaitunizan Binti Muhmud Husin found that the salary and wages were in order. The sampled workers as below:</p> <ol style="list-style-type: none"> 1. I/C Number 930903-02-XXXX 2. I/C Number 921116-08-XXXX <p>Sighted contractor’s workers from AMZ Gemilang Enterprise Husin found that the salary and wages were in order. The sampled workers as below:</p> <ol style="list-style-type: none"> 1. I/C Number 820215-02-XXXX <p>Bukit Selarong Estate</p> <p>Sighted contract agreement External Transport FFB for Zaitunizan Binti mahmud Husin dated 01/01/2021. The contact valid from 01/01/2021 to 30/06/2021.</p> <p>Reviewed the 2-employment contract for the contractor’s workers from Zaitunizan Binti Muhmud Husin found that the salary and wages were in order. The sampled workers as below:</p> <ol style="list-style-type: none"> 1. I/C Number 651122-02-XXXX 2. I/C Number 770623-02-XXXX <p>Bukit Hijau Estate</p> <p>Sighted contract agreement External Transport FFB for Mayang Bayumas Sdn Bhd dated 01/01/2021. The contact valid until 31/12/2021.</p> <p>Reviewed the 2-employment contract for the contractor’s workers. The sampled workers as below:</p> <ol style="list-style-type: none"> 1. I/C Number 750426-02-XXXX 2. I/C Number 881017-02-XXXX <p>Verified that all contractor workers were payed according with Minimum Wages Order 2020.</p> <p>No recurrence of issue observed thus the minor NC was closed effectively on 22/04/2021. Continuous implementation will be further verified in the next audit.</p>

Minor Nonconformities:		
Ref: 1924804- 202001-N2	Area/Process: Sg Dingin POM and Supply Bases	Clause: 4.4.4.2 (e) Part 3
	Issue Date: 02/07/2020	Date of closure: 22/04/2021

Requirements:	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.
Statement of Nonconformity:	It was sighted during the field visit and at the premix store that most of the chemical drums used as premix drums were not labelled with 'Skull/Poison' pictures as stated in the Safety Operating Procedures.
Objective Evidence:	The Sime Darby Plantation Sdn. Bhd., Padang Buloh Estate, Prosedur Kerja Selamat/ Safety Operating Procedure; Membancuh/ Penyimpanan Semula Racun; Penyimpanan Racun/ Tong Lebih; No.4. Memastikan setiap tong racun dilabelkan gambar 'Tengkorak/Racun'. It was sighted during the field visit and at the premix store that most of the chemical container used as premix containers were not labelled with 'Skull/Poison' pictures as stated in the Safety Operating Procedures.
Corrections:	To take immediate action to put the hazard signage "skull logo / Racun" to all related chemical container use for premix
Root cause analysis:	Estate management provide training and awareness to the person in charge regarding Chemical Safety. However minor hiccup happened and it not been supervised according to the estate SOP.
Corrective Actions:	To monitor and have proper schedule for respraying to be done by the estate management. To ensure al premix container put the hazard signage.
Assessment Conclusion:	Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next surveillance assessment.
Verification Statement	Site visit during ASA 3 found the following: Premix container were marked with danger sign with 'Skull/Poison' and "X" as per company SOP. Site checking at Chemical Premix Area and Spraying activity area found premix containers were marked properly and verification through interview found workers have good awareness on differentiate the label of the containers. No recurrence of issue observed thus the minor NC was closed effectively on 22/04/2021. Continuous implementation will be further verified in the next audit.

Minor Nonconformities:		
Ref: 1924804- 202001-N3	Area/Process: Sg Dingin POM and Supply Bases	Clause: 4.5.7.1
	Issue Date: 02/07/2020	Date of closure: 22/04/2021
Requirements:	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	
Statement of Nonconformity:	Fire was used for the disposal of domestic waste	
Objective Evidence:	The Operational Control Procedure for Landfill Management in Estate (SD/SDP/PSQM(ESH)203-EN7) dated 13 th March 2017 states under Section 6 Requirements and Procedures; Section 6.6 Landfill Prohibitions; 6.6.1 Burning of waste in landfill. It was sighted during the site visit at Padang Buloh Estate that fire had been used to burn the domestic waste at the landfill. Section 6 Requirements and Procedure; Section 6.4 Landfill Design Criteria; The landfill shall be designed in accordance with the following criteria; d) the entrance to the landfill site should be fenced and equipped with a signage as indicated below (minimum); "TEMPAT PELUPUSAN SAMPAH DILARANG MEMBAKAR TIADA BAHAN BUANGAN TERJADUAL" It	

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	was sighted that the landfill was not fenced and the signboard available only stated "Tempat Pelupusan Sampah" and did not state "Dilarang Membakar".
Corrections:	To put necessary signboard to ensure reminding of trespassing and open burning.
Root cause analysis:	Open burning by the outsiders
Corrective Actions:	To have proper fencing & signboard surrounding landfill area to ensure no trespassing
Assessment Conclusion:	Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next surveillance assessment.
Verification Statement	<p>Site visit during ASA 3 found the following:</p> <p>There is no evidence of fire was used for disposal of domestic waste. Verified through visit at Line site and Landfill, domestic waste were collected twice a week and disposed at the Landfill. Sighted evidence of signage "No Open Burning" were placed at Line site and Landfill area.</p> <p>No recurrence of issue observed thus the minor NC was closed effectively on 22/04/2021. Continuous implementation will be further verified in the next audit.</p>

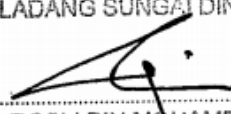

3.4 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
M01	Major Part 4	03/11/2017	Closed
M02	Minor Part 4	03/11/2017	Closed
M03	Major Part 4	03/11/2017	Closed
M01	Minor Part 3	02/11/2017	Closed
M02	Minor Part 3	02/11/2017	Closed
M03	Major Part 3	02/11/2017	Closed
M04	Minor Part 3	02/11/2017	Closed
M05	Major Part 3	02/11/2017	Closed
1741332-201902-N1	Minor Part 3	14/02/2019	Closed
1924804-202001-N1	Minor Part 3	02/07/2020	Closed on 22/04/2021
1924804-202001-N2	Minor Part 3	02/07/2020	Closed on 22/04/2021
1924804-202001-N3	Minor Part 3	02/07/2020	Closed on 22/04/2021
2047686-202104-N1	Minor Part 3	22/04/2021	Open

3.5 Issues Raised by Stakeholders

IS #	Description
<p>1</p>	<p>Issues:</p> <ol style="list-style-type: none"> 1. Zaitunizan Binti Mahmud Husin 2. Mayang Bayumas Sdn Bhd <p>Contractors – They have signed agreement with the management prior to work and have understood all the terms and conditions stated in the agreement. The payment was made promptly. They also understand the MSP0 requirements and aware of the complaint procedures.</p> <p>Management Responses:</p> <p>The management will ensure good relationship with the contractors.</p> <p>Audit Team Findings:</p> <p>No further issue. Awareness on MSP0 matters were in order.</p>
<p>2</p>	<p>Issues:</p> <p>Workers – They have signed on contract agreement prior to work and briefed on the terms and benefits. They were paid according to Minimum Wage Order 2020 and overtime is on voluntarily basis. They management treats them equally without any discrimination of genders and nationalities. They aware of the complaint procedures. They informed that management took prompt action to rectify their complaints.</p> <p>Management Responses:</p> <p>The management will ensure the compliance of regulations and respect the rights of workers.</p> <p>Audit Team Findings:</p> <p>No other issue.</p>
<p>3</p>	<p>Issues:</p> <p>Local communities (Md Noor Bin Ariffin - JKPP) – They informed that no land encroachment by the company at this moment. They have good relationship with the management, and they are aware of the complaint procedure of the company. They informed that local communities in the villages are given job opportunities to work in the mill and estate.</p> <p>Management Responses:</p> <p>The management will continue to maintain good relationship with the stakeholders.</p> <p>Audit Team Findings:</p> <p>No other issue.</p>

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment <i>Sime Darby SOU 1 Sg Dingin POM and Estates</i> Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013 . It is recommended that the certification of <i>Sime Darby SOU 1 Sg Dingin POM and Estates</i> Certification Unit is approved and/or continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: MOHD ROSLI BIN MOHAMED SUHAIMI	Name: Nor Halis Bin Abu Zar
Company name: SIME DARBY PLANTATION BHD .	Company name: BSI Service Malaysia
Title: SR. MANAGER .	Title: Client Manager
Signature: SIME DARBY PLANTATION BERHAD Company No: 647766-V LADANG SUNGAI DINGIN  MOHD ROSLI BIN MOHAMED SUHAIMI SR. MANAGER Date: 19/5/2021	Signature:  Date: 18/05/2021

Appendix A: Summary of the findings by Principles and Criteria

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

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	Sime Darby Plantation Berhad has issued an inter-office mail (Ref. No.: SQM.RSPO.1811/22.11) dated 23/11/2018 regarding the statement on commitment towards MSPO implementation by Head, Global Sustainability Operations, Mr. Tang Men Kon. Sime Darby Plantation Berhad is committed to comply and implement the MSPO certification to demonstrate our commitment towards the production of certified sustainable palm oil products.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	Sime Darby Plantation Berhad has clearly emphasized to achieve commitment towards a systematic approach in ensuring continuous improvement in the operation, compliance to statutory, legal and other regulatory requirements and establishment of traceability within the supply chain in the above-mentioned memorandum.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Seen the notification of internal audit SOU 1 sent out by the Sustainability Compliance Unit on 08/02/2021. The latest MSPO, RSPO & SCCS Internal Audit was conducted by GSD Malaysia & Northern RSQM. The detail date and findings as below:	Complied

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Criterion / Indicator		Assessment Findings					Compliance																			
		<table border="1"> <thead> <tr> <th>Estate</th> <th>Date</th> <th>Major NC</th> <th>Minor NC</th> <th>OFI</th> </tr> </thead> <tbody> <tr> <td>Somme Estate</td> <td>19-20/02/2021</td> <td>3</td> <td>6</td> <td>1</td> </tr> <tr> <td>Bukit Hijau Estate</td> <td>17/02/2021</td> <td>8</td> <td>7</td> <td>3</td> </tr> <tr> <td>Bukit Selarong Estate</td> <td>15/02/2021</td> <td>5</td> <td>7</td> <td>4</td> </tr> </tbody> </table> <p>The audit was carried out based on the reference of MS 2530-3:2013 and MS 2530-4:2013. Seen the Internal Audit Report with root cause identified for the non-conformities and OFIs raised. All the non-conformities and OFIs were closed accordingly as per dateline.</p>	Estate	Date	Major NC	Minor NC	OFI	Somme Estate	19-20/02/2021	3	6	1	Bukit Hijau Estate	17/02/2021	8	7	3	Bukit Selarong Estate	15/02/2021	5	7	4				
Estate	Date	Major NC	Minor NC	OFI																						
Somme Estate	19-20/02/2021	3	6	1																						
Bukit Hijau Estate	17/02/2021	8	7	3																						
Bukit Selarong Estate	15/02/2021	5	7	4																						
4.1.2.2	<p>The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has developed Internal Audit Procedure, Doc. No.: SD/SDP/PSQM/IAP, Rev. 2 dated 01/11/2017. The frequency of the internal audit shall be carried out at least once a year and when is required.</p> <p>Seen the Internal Audit Report with root cause identified for the non-conformities and OFIs raised. All the non-conformities and OFIs were closed accordingly as per dateline. Sighted reply on 01/03/2021.</p>	Complied																							
4.1.2.3	<p>Report shall be made available to the management for their review.</p> <p>- Major compliance -</p>	<p>The internal audit report has distributed to the estate's management. The Management Representative has acknowledged on the acceptance of the Internal Audit Report. Management review meeting was conducted to review the findings of the internal audit.</p>	Complied																							
Criterion 4.1.3 – Management Review																										
4.1.3.1	<p>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.</p>	<p>The latest management review meeting was carried out for SOU 1 Estates. Sample checking on Minutes of Meeting Management Review Meeting dated:</p> <p>1. Somme Estate: 25/03/2021</p>	Complied																							

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	2. Bukit Hijau Estate: 19/03/2021 3. Bukit Selarong Estate: 18/02/2021 Sighted agenda of meeting chair by Senior Manager / Manager: 1. Results of internal audits covering RSPO & MSPO 2. Customer Feedback 3. Status of preventive and corrective actions 4. Follow-up actions from management reviews - To follow-up with RSQM on training/ coaching session for HIRARC - To issue a new format of employment contract and brief the worker accordingly. 5. Changes that could affect the management system 6. Recommendations for improvement 7. Improvement of the effectiveness of the management system and processes 8. Resources needs	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance -	Sighted evidence of continues improvement plan for SOU 1 Estate for the year 2021 dated 02/01/2021. It was including: 1. Social management plan 2. Fossil Fuel Management Plan 3. IPM Plan	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		4. ESH Plan 5. Water Management Plan, 6. Wastewater Management Plan	
4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. - Major compliance -	Somme Estate is under collaboration with Planning and Corporate Plantation Upstream for project EWG – Bejoni Mulch. The purpose for Fertilizer Mulch Application. Refer email dated 27/04/2020. Bukit Selarong estate is under collaboration with Planning and Corporate Plantation Upstream for project EWG – Bejoni Mulch. The purpose for Fertilizer Mulch Application. Refer email dated 31/03/2021.	Complied
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	Seen the attendance list and photo evident of the training conducted. The R&D is in the middle of collecting data of the usage of the device. Training of Bejoni Mulch has been conducted 07/04/2021. Sighted training material, attendance and photos.	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. - Major compliance -	Sime Darby Plantation has developed Estate Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 1, issue date 1/4/2008. The procedure has detailing the process of handling complaints from stakeholders and the time frame for external communication to be dealt with. The time frame to provide feedback is within two weeks of the date of receipt for communication and within one week of the completion of the investigation. The management has briefed the stakeholders from Feedback Form regarding on the communication and complaint	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		procedures. . Refer letter dated 16/02/2021 "Penerangan Pensijilan MSPO Dan Maklum Balas Pihak Berkepentingan (Stakeholder)".	
4.2.1.2	<p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>Publicly available management documents such as land titles, OHS plans, EIA and SIA reports, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans are available. All operating units have individual documents and records to demonstrate compliance to this indicator. Sustainability Reports, policies and procedures are also accessible through the company's website: http://www.simedarbyplantation.com/</p>	Complied
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation has developed Estate Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 1, issue date 1/4/2008 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance. Timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation.</p> <p>Besides, the company has developed a documented procedure in Sustainable Plantation Management System on handling social issues, Appendix 5, Version 1, and Issue No.1, dated 01/04/2008. The procedure has detailing the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.2.2.2	<p>A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.</p> <p>- Minor compliance -</p>	<p>Seen the appointment letter for Social “Perlantikan Sebagai Pegawai Rasmi Yang Bertanggungjawab Ke Atas Isu Isu Sosial Untuk Ladang”. Role and responsibilities were clearly stated in the appointment letter.</p> <p>Somme Estate: En Nathan A/L Kannan (Manager) dated 02/01/2021</p> <p>Bukit Selarong Estate: En Ahmad Nor Halim Bin Omar (Manager) dated 02/01/2021</p> <p>Bukit Hijau Estate: En Norazmi Ismail (Manager) dated 02/01/2021</p> <p>Appointed by Regional CEO Northern Region.</p>	Complied
4.2.2.3	<p>List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.</p> <p>- Major compliance -</p>	<p>Stakeholder list was developed with relevant stakeholders such as local communities, government authorities, NGOs, contractors, and suppliers were included in the list. Somme Estate were updated their List of Stakeholder on 20/03/2021, while Bukit Selarong Estate on 02/01/2021, and Bukit Hijau Estate on 04/01/2021.</p> <p>Issues raised by stakeholders were recorded in the minutes and responded by the management accordingly. Stakeholder meeting which was scheduled for Year 2021 was postponed due to Movement Control Order by the government. However, estate management sent letter for communication related MSPO with stakeholders. Stakeholders such as contractors, school’s representatives, local communities and government authorities were giving feedback. Refer letter dated 16/02/2021 “Penerangan Pensijilan MSPO Dan Maklum Balas Pihak Berkepentingan (Stakeholder)”. Sighted Feedback gain from stakeholders. Issue raised by stakeholders has been recorded in SIA management plan and resolve by the management.</p> <p>Sample checking:</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		1. JKKK Kg Kuala Kuli dated 15/04/2021 Request on road repair and action taken on 19/04/2021 2. Hock Lee Trading Co dated 15/04/2021 No issue 3. Guru Besar SK Bukit Selarong dated 10/04/2021 Grasscutting at Scholl football field and action taken on 12/04/2021	
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). - Major compliance -	Sime Darby Plantation Sdn Bhd has established the SOP for Sustainable Supply Chain Traceability, version 2, year 2018, issue no 5. The objectives of this SOP is to provide guidelines for estates and palm oil mills to ensure effective implementation of sustainable supply chain and traceability on certified sustainable materials ((FFB, CPO & PKO) and to ensure that the production and claims of certified sustainable materials adhere to the relevant sustainability certification system (RSPO, MSPO, SCCS & ISCC). FFB delivery records to Sungai Dingin Palm Oil Mill has been made available and verified during the audit program. The records indicate the information as follow; weighbridge ticket from estate, block no, delivery note, receivable records and weighbridge ticket from mill.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Inspections were conducted on daily basis, which will be prepared by the estate staff and verified by the estate manager.	Complied
4.2.3.3	The management should identify and assign suitable	Each operating unit has assigned respective person in charge to maintain the traceability system.	Complied

Criterion / Indicator		Assessment Findings			Compliance												
	employees to implement and maintain the traceability system. - Minor compliance -	<table border="1"> <thead> <tr> <th>Estate</th> <th>Name</th> <th>Date of Appointment</th> </tr> </thead> <tbody> <tr> <td>Somme</td> <td>Izuwan Bin Ibrahim</td> <td>02.01.2021</td> </tr> <tr> <td>Bukit Hijau</td> <td>Muhammad Ammar Mohamad Ramly</td> <td>06.01.2021</td> </tr> <tr> <td>Bukit Selarong</td> <td>Shaiful Fahmi Abu Bakar</td> <td>03.01.2021</td> </tr> </tbody> </table>	Estate	Name	Date of Appointment	Somme	Izuwan Bin Ibrahim	02.01.2021	Bukit Hijau	Muhammad Ammar Mohamad Ramly	06.01.2021	Bukit Selarong	Shaiful Fahmi Abu Bakar	03.01.2021			
Estate	Name	Date of Appointment															
Somme	Izuwan Bin Ibrahim	02.01.2021															
Bukit Hijau	Muhammad Ammar Mohamad Ramly	06.01.2021															
Bukit Selarong	Shaiful Fahmi Abu Bakar	03.01.2021															
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	Delivery or transportation record of FFB was made available and well maintained by the estate management. Sighted the delivery records from Bukit Selarong Estate as follow: Date: 02.04.2021 Lorry no: PJN9238S33 Ticket no: 248131 Tonnage: 7.8 Mt			Complied												
4.3 Principle 3: Compliance to legal requirements																	
Criterion 4.3.1 – Regulatory requirements																	
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	License and permits as below: <u>Somme Estate</u> 1. Approval letter for water and electrical supply deduction was made available to the audit team. Sighted as follow: Water: enforcement date 11.02.2020, referral no: PMT/10203/2020/0003(3). Electric: enforcement date 24.12.2019, referral no: PMT/10203/2020/0024(3).			Complied												

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Criterion / Indicator	Assessment Findings	Compliance
	<p>2. Permit for temple deduction approved on June 2010, serial no: PP/3/2/0081.</p> <p>3. Permit for "Tabung Surau" deduction was approved on 30.11.201, referral no: PMT/1003/201/2017/0082(4).</p> <p>4. MPOB license no: 524666002000, expired on 31.10.2021 for 942.30 ha.</p> <p>5. Apparatus assignment (satellite), expired 31.12.2021, apparatus assignment no: 38977/0801074_001/2020, reference no: 0801074.</p> <p>6. "Permit barang kawalan berjadual" for diesel storage 7500 litre, serial no: P(K000201), referral no: KPDNHEP.KLM(P)14/1999 expired on 15.01.2022.</p> <p>7. "Pengandung tekanan tak berapi", referral no PMT-KD/20 24554. Expired on 15.04.2022.</p> <p><u>Bukit Selarong Estate</u></p> <p>1. "Permit barangan kawalan berjadual", serial no: K003332, ref no: KPDNHEP.BLG(SK)05/2010. The estate in the process of obtaining new permission to upgrade diesel storage from 14000 litre to 18000 litres. Approval date is on 30.03.2021.</p> <p>2. "Permit barangan kawalan berjadual", serial no: K001242, ref no: KPDNHEP.KLM(P)06/2007, expired on 03.11.2021.</p> <p>3. "Pengandung Tekanan Tak Berapi", reg no: KDPMT1030, expired on 04.07.2022.</p> <p>4. MPOB license no: 525104002000, expired on 30.11.2021.</p> <p>5. MPOB license no: 54007501100, expired on 31.05.2021.</p> <p><u>Bukit Hijau Estate</u></p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<ol style="list-style-type: none"> 1. "Permit barangan kawalan berjadual", ref no: KPDNHEP.BLH(SK)03/2012, expired on 22.06.2021, approval limit for diesel storage is 18000 litres. 2. MPOB license no: 52441002000, expired on 31.10.2021. 3. "Perlesenan & Permit Getah", license no: K/01/15416, expired on 29.06.2021. 4. Water abstraction license no: WA2019020009, expired on 01.06.2022. 5. Assignments conditions for satellite category (earth station), apparatus assignment no: 3897/-801344_001/2020, ref no: 0801344, expired on 31.12.2021 	
<p>4.3.1.2</p>	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>The estate management has listed and recorded all laws applicable to their operation in a Legal & Other Regulation Requirements. Group Sustainability Department (at head quarter level) will update the region office - estates & mills, should there be any new law or amendment coming into force.</p> <p>Among the legal and regulation sighted are as follow:</p> <ol style="list-style-type: none"> 1. Occupational Safety & Health Act 199 2. Factories and machinery Act 1967 3. Fire Services Act 1988 (Act 341) Amendment 2018 4. Pesticides Act 1974 (Act 148) 5. Poisons Act 1952 (Revised 1989) (Act 366) 6. Environment Quality Act 1974 (Act 127) 7. Water Act 1920 (Act 418) 8. Labour Act 1955 <p>Revision and amendment of law & regulation.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance												
		1. Akta Pencegahan Dan Kawalan Penyakit Berjangkit 1988 (pindaan 2020) 2. Perintah Kawalan Pergerakan 2020 3. Arms Act 1960 (revision 2019)													
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	The Sime Darby Plantation Berhad Headquarters will update each region whenever they received any update regarding on the new regulations or new amendment laws coming into force. Thru the headquarters' representative which were based in each region, the information will be distributed among the operating unit (estate/mill).	Complied												
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. - Minor compliance -	Each operating unit has assigned respective person in charge to monitor compliance and to track and update the change in regulatory. <table border="1" data-bbox="1048 850 1865 1090"> <thead> <tr> <th>Estate</th> <th>Name</th> <th>Date of Appointment</th> </tr> </thead> <tbody> <tr> <td>Somme</td> <td>Izuwan Bin Ibrahim</td> <td>02.01.2021</td> </tr> <tr> <td>Bukit Hijau</td> <td>Muhammad Ammar Mohamad Ramly</td> <td>06.01.2021</td> </tr> <tr> <td>Bukit Selarong</td> <td>Shaiful Fahmi Abu Bakar</td> <td>03.01.2021</td> </tr> </tbody> </table>	Estate	Name	Date of Appointment	Somme	Izuwan Bin Ibrahim	02.01.2021	Bukit Hijau	Muhammad Ammar Mohamad Ramly	06.01.2021	Bukit Selarong	Shaiful Fahmi Abu Bakar	03.01.2021	Complied
Estate	Name	Date of Appointment													
Somme	Izuwan Bin Ibrahim	02.01.2021													
Bukit Hijau	Muhammad Ammar Mohamad Ramly	06.01.2021													
Bukit Selarong	Shaiful Fahmi Abu Bakar	03.01.2021													
Criterion 4.3.2 – Lands use rights															
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	The management do not diminish the land use rights of other users as the lands are belonging to Sime Darby Plantation Berhad as verified through the land title. Besides, stakeholder meeting and phone interviewed with the local communities confirmed that no encroachment of land and land dispute reported.	Complied												

Criterion / Indicator	Assessment Findings	Compliance
<p>4.3.2.2 The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p>- Major compliance -</p>	<p>Sighted evidence of Quit Rent payment for all sampled Estate. There is no issue on legal ownership and lease.</p> <p>There are total 124 land titles in Somme Estate and the estate able to show legal ownership on the use of land. Sampled the land title as below:</p> <ol style="list-style-type: none"> 1. Land title No.: 31615; Lot No.: 63; 46.1491 hectares 2. Land title No.: 47411; Lot No.: 847; 2.9264 hectares 3. Land title No.: 46667; Lot No.: 732; 3.0534 hectares <p>The owner of the lands is belonging to Sime Darby Plantations Berhad.</p> <p>There are total 43 land titles in Bukit Selarong Estate and the estate able to show legal ownership on the use of land. Sampled the land title as below:</p> <ol style="list-style-type: none"> 1. Land title No.: 1512; Lot No.: 219; 0.6245 hectares 2. Land title No.: 70856; Lot No.: 562; 23.0168 hectares 3. Land title No.: 35390; Lot No.: 41; 22.6346 hectares <p>The owner of the lands is belonging to Sime Darby Plantations Berhad.</p> <p>There are total 35 land titles in Bukit Hijau Estate and the estate able to show legal ownership on the use of land. Sampled the land title as below:</p> <ol style="list-style-type: none"> 1. Land title No.: 35380; Lot No.: 132; 53.2844 hectares 2. Land title No.: 35530; Lot No.: 1246; 50.6141 hectares 3. Land title No.: 4777; Lot No.: 1105; 12.5736 hectares 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		The owner of the lands is belonging to Sime Darby Plantations Berhad.	
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The legal boundary for estate visited was clearly demarcated by constructing security trenches along the boundary and it was visibly maintained. The legal boundary was clearly demarcated with signboard and security trenches as sighted at neighbouring estates and villagers.	Complied
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no land dispute in the SOU 1 Supply Bases land area at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified. Phone interviewed with the local communities confirmed that no encroachment of land and land dispute reported.	Complied
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary land or negotiated agreements within the SOU 1 Supply Bases land area. Interviewed with the local communities confirmed that no land encroachment.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	There is no customary land or negotiated agreements within the SOU 1 Supply Bases land area. Interviewed with the local communities confirmed that no land encroachment.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There is no customary land or negotiated agreements within the SOU 1 Supply Bases land area. Interviewed with the local communities confirmed that no land encroachment.	Complied
4.4 Principle 4: Social responsibility, health, safety and employment condition			

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	<p>Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.</p> <p>- Minor compliance -</p>	<p>SIA for SOU1 was conducted from 23/02/2015 to 05/03/2015 by Social & Environment Projects Unit, PSQM Department. The methodology of the assessment was through field interview with stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, schools' representatives, officers from government authorities and internal workers. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community, education, safety and health, living condition, infrastructure and amenities and stakeholder engagement were assessed accordingly.</p> <p>Somme Estate has developed the social management plan for the year 2021 on 19/03/2021 where the issues collected from OSH meeting, union meeting and complaint book.</p> <p>Bukit Selarong Estate has developed the social management plan for the year 2021 on 04/04/2021 where the issues collected from Feedback form stakeholder consultation.</p> <p>Bukit Hijau Estate has developed the social management plan for the year 2021 on 04/04/2021 where the issues collected from Feedback form stakeholder consultation.</p> <p>The social management plan was implemented, reviewed, and updated on yearly basis in the participatory way by collected feedbacks during meeting with stakeholders.</p>	<p>Complied</p>
Criterion 4.4.2: Complaints and grievances			

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Criterion / Indicator		Assessment Findings	Compliance
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/hotline can be found in https://www.simedarbyplantation.com/corporate/whistleblowing.</p> <p>Besides, the company has implemented "Suara Kami" as a platform for the workers to raise any issue. Besides, the managements have briefed the stakeholders during stakeholder meetings on the procedure of complaint.</p>	Complied
4.4.2.2	<p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.</p> <p>- Major compliance -</p>	<p>SOU 1 Estates has implemented Complaint Book and Housing Defect Record to record any complaints from internal and external stakeholders. Sampled of the complaints as below:</p> <p>Somme Estate</p> <p>Issue: water issue, electricity and flooring in the toilet broken reported on 18/01/2021 and 22/01/2021.</p> <p>Status: The management has informed on repaired on 22/01/2021. The complainant has acknowledged on the complaint form after the complaint has been resolved.</p> <p>Bukit Selarong Estate</p> <p>Issue: Broken lampu at house reported on 02/02/2021</p>	Minor Non Compliance

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Status: The management has informed on repaired on 14/02/2021. The complainant has acknowledged on the complaint form after the complaint has been resolved.</p> <p>Minor NC</p> <p>There is no evidence that internal complaint has been solved in timely manner.</p> <p>Sighted complaint record at Somme Estate and Bukit Selarong Estate. Refer Complaint Book and Housing Defect Record. There is evidence of issue has been resolved.</p> <p>However, during document checking at Bukit Hijau Estate, it was found there is no record of feedback and action taken of 1 complaint dated 30/03/2021 that against Standard Operating Manual "Flowchart and Procedure on Handling Issue" dated 01/04/2008 Section 6.3.</p>	
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p> <p>- Minor compliance -</p>	<p>SOU 1 Estates has implemented Complaint Book for internal and external to record complaints and requests reported by the stakeholders. The complaint book is available outside the main office as verified through photo evidence.</p>	Complied
4.4.2.4	<p>Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.</p> <p>- Minor compliance -</p>	<p>Interviewed with the internal and external stakeholders during stakeholder consultation found that they were aware of the complaint procedure and they were briefed by the management.</p> <p>The workers in the Somme Estate have been briefed on the grievance procedure on 24/02/2021 and seen the record of briefing.</p> <p>The workers in the Bukit Selarong Estate have been briefed on the grievance procedure on 10/02/2021 and seen the record of briefing.</p>	OFI

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Criterion / Indicator		Assessment Findings	Compliance			
		Management could improve on additional training for stakeholders regarding complaint procedure for enhancing their awareness. (Somme Estate, Bukit Selarong Estate).				
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	Record review found that previous complaints and requests from Year 2018 were still available.	Complied			
Criterion 4.4.3: Commitment to contribute to local sustainable development						
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	The estate management has made contribution to the community such as construction of hump at the school upon request by the representative. Seen the photo evident of the construction done. Besides, the management provided assistance to the school for the development of the surrounding of school and a certificate of appreciation from the school was awarded to the estate management. Bukit Selarong Estate – Grass cutting every month at SJKT Ladang Victoria and Repair Fencing SMK Padang Serai on 06/01/2021.	Complied			
Criterion 4.4.4: Employees safety and health						
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	The group has developed a Group Sustainability & Quality Policy Statement, endorsed by Mr. Mohamad Helmy Othman Basha on 02.12.2019. The statement indicated their commitment to provide safe and healthy workplace and protecting worker’s welfare.	Complied			
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;">Estate</td> <td style="width: 50%;">Training</td> <td style="width: 25%;">Date</td> </tr> </table>	Estate	Training	Date	
Estate	Training	Date				

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Criterion / Indicator		Assessment Findings			Compliance		
		Somme	First aid kid training	09.02.2021			
			Fire drill training	16.03.2021			
			Briefing on noise risk assessment report	09.11.2020			
		Bukit Selarong	Training on SDPB Health, Safety & Environment policies to workers.	10.02.2021			
			Inductive training for new workers	03.02.2021			
			Chemical Spillage Training	13.01.2021			
			First aid training	29.03.2021			
			Scheduled waste training	08.03.2021			
			Refreshing training (circle sprayer)	05.02.2021			
			Refreshing training (pump spray)	26.11.2020			
		Bukit HIjau	Training on SDPB Health, Safety & Environment policies to workers.	03.01.2021			
			Safe working training on spraying activities.	16.01.2021			
			Safe working training on harvesting activities.	18.01.2021			
			Safe working training on manuring for mature palm.	02.02.2021			
		Interview with the workers during the site visit indicated their understanding regarding on the safety and health issue. They do					

Criterion / Indicator		Assessment Findings	Compliance
		awareness on the accident and emergency procedure and know on how to react if any accident or emergency cases occurred.	
4.4.4.2	<p>The occupational safety and health plan shall cover the following:</p> <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust 	<ul style="list-style-type: none"> a. Training record on safety and health policy were made available to the audit team. During the interview, the workers can demonstrate a fair understanding and aware about the safety at the work place. b. Risk of all operations had been assessed and HIRARC document produced for each estate. Sighted the HIRARC has been updated on 20.12.2021 with the addition of Fertilizer Mulch (used during the replanting phase) for Somme Estate. CHRA was conducted by Mr. Haji Shaari Chin on 15.10.2020, DOSH ref no: HQ/09/ass/00/124, report no: HQ/09/ass/00/124 – 2020/0052. c. The estate management do take responsibility on the safety and health of their workers by providing series of training to ensure their workers work in a safe condition. They have established a training program especially for those who are involve with chemicals. Training records were made available and verified during the audit program. Indicator 4.4.4.1 has explained the records of training from the estates respectively. d. The estate workers were provided with PPE while performing their daily task and they can ask for replacement if the previous PPE was damage. PPE issuance records were made available to the audit team. During the site visit, it was observed some of the workers who did not utilise the PPE usage. It would be better if the estate management could increase the awareness via the morning briefing or thru training among the workers. 	Complied

Criterion / Indicator		Assessment Findings	Compliance									
	<p>must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee’s health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>e. The Sime Darby Plantation Sdn Bhd has developed a Chemical Safety Management Procedure, approved by Mr. Iqmal Fajri Danial (Head of Safety Environment, Upstream Malaysia) on 09.03.2021. the procedure has outlined the requirement and procedures as follow:</p> <ul style="list-style-type: none"> i. Procurement of chemicals ii. Transportation of chemicals iii. Receiving of chemicals iv. Storage of chemicals v. Handling of chemicals vi. Disposal of chemicals vii. Training viii. Maintenance of equipment. <p>f. Estate management has appointed person in charge for worker’s safety and health as follow:</p> <ul style="list-style-type: none"> i. Bukit Selarong Estate: Mr Shaiful Fahmi Abu Bakar (estate assistant manager), 03.01.2021. ii. SOMME Estate: Mr. Izuwan Bin Ibrahim (estate assistant manager), 02.01.2021. iii. Bukit Hijau Estate: Mr. Muhammad Ammar Mohamad Ramly, 06.01.2021. <p>g. OSH meetings were conducted accordingly.</p> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>Estate</th> <th>No of Meeting</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Somme</td> <td>1. First meeting, participants 15, absent 8.</td> <td>15.01.2021</td> </tr> <tr> <td></td> <td></td> <td>12.04.2021</td> </tr> </tbody> </table>	Estate	No of Meeting	Date	Somme	1. First meeting, participants 15, absent 8.	15.01.2021			12.04.2021	
Estate	No of Meeting	Date										
Somme	1. First meeting, participants 15, absent 8.	15.01.2021										
		12.04.2021										

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Criterion / Indicator		Assessment Findings			Compliance
			2. Second meeting, participants 19, absent 3.		
		Bukit Hijau	1. First meeting was conducted on, participated by 16, absent by 12.	18.03.2021	
		Bukit Selarong	1. First meeting, participants 20, absent 12.	19.03.2021	
		<p>h. Sime Darby Plantation Berhad has established an Emergency Response Procedure (ERP). ERP are initiated for fire & flood, chemical spillage, motor & vehicle accident, wild & poisonous animal attack and first aid team. During the site visit, the workers can demonstrate a good understanding regarding on the accident & emergency procedure. They are aware to whom should be informed if any accident happened while carry out their task.</p> <p>i. First aider was presented during the audit program and the estate management has conducted the first aid training to the related person.</p> <p>j. Records for the accident was well kept reviewed during the OSH meeting. Sighted the JKKP8 form has been submitted to DOSH as follow:</p> <p>Somme Estate has submitted the JKKP8 form to DOSH on 11.01.2021, ref no: JKKP8/4237/2020.</p> <p>Bukit Selarong Estate has submitted their JKKP 8 form on 11.01.2021, ref no: JKKP8/71140/2020. 1 accident was recorded in year 2020.</p>			

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Criterion / Indicator		Assessment Findings	Compliance
		Bukit Hijau Estate has submitted their JKKP 8 form in 26.01.2020, ref no: JKKP8/65755/2020. 2 accidents were recorded in year 2020.	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation has established Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC). The HRC was last revised on August 2020. They promote the human rights, safeguard democracy and its institutions and not violate the rights of others. They also recognize the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, they are committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as respond to complaints on any alleged threats made to them. Refer to Policy on the Protection of Human Rights Defenders (HRDs) dated 25/03/2020 for more information. Policy on the Protection of HRDs_FINAL.pdf (sime-darbyplantation.com).</p> <p>The policies were communicated to stakeholders during stakeholder meetings. Besides, the briefing of the policies to workers was conducted on 10/02/2021 at Bukit Selarong Estate.</p>	Complied
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion,	Sime Darby Plantation has developed Human Rights Charter to ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at work and providing a platform for	Complied

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	<p>nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>workers' voice and social dialogue. They respect the rights of workers and provide fair and favourable working conditions by Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. They will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy could be downloaded from https://www.simedarbyplantation.com/sustainability/human-rights-charter.</p>	
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>- Major compliance -</p>	<p>There were employment contracts for staffs and workers. Pay and conditions are documented and achieved the Minimum Wage Order 2020. Sime Darby has sign the Collective Agreement with National Union of Plantation Workers (NUPW). Sample of employment contracts are reviewed, and the agreements are signed in both English and home country language (i.e. Hindi, Bahasa Malaysia/Indonesia). Upon the foreign workers arriving to the estate, they will be inducted for the terms and conditions of employment contract and briefed on the company's policies. Sample check on contract agreement and pay slip:</p> <p>Somme Estate</p> <ol style="list-style-type: none"> 1. Employee code: 27524 2. Employee code: 27570 3. Employee code: 114823 4. Employee code: 132931 5. Employee code: 152517 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Bukit Selarong Estate 1. Employee code: 25228 2. Employee code: 25313 3. Employee code: 25427 4. Employee code: 146279 5. Employee code: 150921 Bukit Hijau Estate 1. Employee code: 138548 2. Employee code: 131189 3. Employee code: 25848 4. Employee code: 156439 5. Employee code: 90584	
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance -	Somme Estate Sighted contract agreement External Transport FFB from Somme to SDM Document number 4300536713 dated 01/04/2021. The contract validity updated on monthly basis. Reviewed the 2-employment contract for the contractor’s workers from Zaitunizan Binti Muhmud Husin found that the salary and wages were in order. The sampled workers as below: 1. I/C Number 930903-02-XXXX 2. I/C Number 921116-08-XXXX	Complied

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	<p>Sighted contractor’s workers from AMZ Gemilang Enterprise Husin found that the salary and wages were in order. The sampled workers as below:</p> <ol style="list-style-type: none"> 1. I/C Number 820215-02-XXXX <p>Bukit Selarong Estate</p> <p>Sighted contract agreement External Transport FFB for Zaitunizan Binti mahmud Husin dated 01/01/2021. The contact valid from 01/01/2021 to 30/06/2021.</p> <p>Reviewed the 2-employment contract for the contractor’s workers from Zaitunizan Binti Muhmud Husin found that the salary and wages were in order. The sampled workers as below:</p> <ol style="list-style-type: none"> 1. I/C Number 651122-02-XXXX 2. I/C Number 770623-02-XXXX <p>Bukit Hijau Estate</p> <p>Sighted contract agreement External Transport FFB for Mayang Bayumas Sdn Bhd dated 01/01/2021. The contact valid until 31/12/2021.</p> <p>Reviewed the 2-employment contract for the contractor’s workers. The sampled workers as below:</p> <ol style="list-style-type: none"> 1. I/C Number 750426-02-XXXX 2. I/C Number 881017-02-XXXX 	
<p>4.4.5.5</p>	<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</p>	<p>The estate management has registered all their workers into Employee Master Details Listing in SEMUA system where personal details such as full name, gender, date of birth, date join company, race, designation,</p> <p>Complied</p>

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	<p>should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	and wages were recorded. Verified the Employee Master Details Listing.	
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	Sample of 16 employment contracts at Somme Estate, 14 at Bukit Selarung Estate, are reviewed, and the contracts are signed in dual language which is English and their home country language such as Hindi, Bahasa Malaysia/Indonesia. The terms and conditions such as working hours, deduction, overtime, sick leave, holiday entitlement, reason of dismissal and period of notice were outlined in the contract.	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p>- Major compliance -</p>	Seen the Estate Daily Attendance Report for February 2020, September 2020 and December 2020 where it recorded the number of days work and hours of overtime work. The data was transferred from pocket checkroll and input form into the SAP system.	Complied
4.4.5.8	<p>The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.</p> <p>- Major compliance -</p>	Interviewed with the workers confirmed that they have rest time in between of the working hours. Overtimes were paid according to the rate stated in the agreement and regulatory requirements. The overtime offered upon mutually agreement.	Complied
4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p>- Major compliance -</p>	Wages and overtime were paid according to the Estate Daily Attendance Report. Total hours of overtime and daily attendance has recorded in the SAP system and the payslips.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. - Minor compliance -	All the workers are provided with free medical facilities. The workers are entitled with the phone allowance of RM 5 for every month. Free housing facilities were provided to all the workers and their families with free water supply. 10kg of rice was supplied to all the workers once every 2 months and confirmed through interviewed with the workers.	Complied
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. - Major compliance -	The estate management has provided free housing facilities to all the workers. Basic amenities such as water and electricity were provided to the workers. The estate workers are using SADA water. Linesite inspection was carried out on weekly basis by Hospital Assistant and Supervisor refer Housing Complex/ Nest/ Community Hall Inspections Form. The last inspection for was conducted on 15/04/2021, 12/04/2021, 05/04/2021 and 31/03/2021 for Somme Estate. For Bukit Selarong Estate last inspection conducted on 17/04/2021, 09/04/2021, 19/03/2021 and 12/03/2021.	Complied
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Sime Darby Plantation has developed Human Rights Charter where they create a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict. Somme Estate The policy was communicated to the workers during muster call on 10/02/2021. Gender Committee has organized meeting and the last meetings were conducted on 15/03/2021. There is no issue raised during the meeting.	Complied
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in	Sime Darby Plantation has developed Human Rights Charter where they respect Freedom of Association by respecting the rights of employees to form and join unions and bargain collectively. In	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>jurisdictions where this right is limited, they will provide alternative means of employee engagement and grievance redressal. Meeting of National Union Of Plantation Workers Cawangan Negeri Kedah, Perlis, Dan Pulau Pinang dated 29/07/2020. Sighted evidence attendance by I.Santhanadass AMK. BKM. Secretary.</p> <p>Somme Estate Union meeting was held on 16/04/2021, Bukit Selarong held on 19/03/2021 and Bukit Hijau Estate held on 16/04/2021. Issues raised during the meeting were responded by the management during the meeting. Most of the issues related to upkeep and maintenance of Surau, and monthly cleaning of Temple. Meeting minutes was sighted.</p> <p>Besides, there was a letter from representative of NUPW from estate dated 24/09/2020 related to issues in the workers' housing area. The management has responded the letter on 07/10/2020 with proposed action to be taken or action taken, and a copy of the respond letter was given to the representative with acknowledgement of receipt. Seen the evidence of quotation dated 12/10/2020 issued to contractor to repair streetlight at Division as reported by the representative. Photo evident of the repair work was sighted.</p>	
<p>4.4.5.14 Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter where they recognise that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography by:</p> <ul style="list-style-type: none"> • Eradicating child labour in our supply chain. They will not employ anyone under the age of 18 years. • Providing process for remedy if children are found working. They will develop a solution that is in the best interest of the child in partnership with qualified organisations. 	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> Recognising that education is a crucial component in effectively eliminating child labour, they commit to providing all our workers' children with access to primary and secondary education. <p>The policy was communicated to the workers during morning muster call dated 12/04/2021 at Bukit Selarong Estate, 03/01/2021 at Bukit Hijau Estate.</p>	
Criterion 4.4.6: Training and competency			
4.4.6.1	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p>- Major compliance -</p>	<p>The estate management has schedule training programmed for the whole year 2021. There was also session held with contractors and neighbouring communities. The records were made available to the audit team and verified. Training records were well kept in the training files.</p>	Complied
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 estate management has established the training needs for each person in the estate list. The training needs included in the program such as safety & health, environment, safe working procedures, sustainability briefing & training, estate daily work procedures and equipment handlings.</p>	Complied
4.4.6.3	<p>A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	<p>Training program planned for year 2021 includes trainings for all categories of workers specifically design based on the job categories such as for harvesters, sprayers, manurers, upkeep gang and etc.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance						
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services									
Criterion 4.5.1: Environmental Management Plan									
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	The estate management has established Environmental Management Plan which consist 4 main items; Waste Management Plan, Water Management Plan, High Biodiversity Management Plan and Energy Management Plan. These plans indicate their objectives, category and action plan.	Complied						
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. - Major compliance -	The estate management has developed environmental management plan based on the activities conducted in the estate compound. The aspect and impact analysis were described and explain in the table under indicator 4.5.1.1. The plan was communicated to the entire work force in order to disseminate the right information and to ensure the objective of the environmental policy is achieved. According to the interview feedback with the workers, it is noted that the workers are well aware on the environmental issues and wildlife illegal hunting.	Complied						
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. - Major compliance -	<p>This is available in the Environmental Management Plan under indicator 4.5.1.1, under column Action Plan. The estate management has taken necessary action to help reduce the pollution and at the same time conserve the nature by monitoring the water and chemical in daily estate activities.</p> <table border="1"> <thead> <tr> <th>Management Plan</th> <th>Category</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>Waste</td> <td>Domestic</td> <td>Collect recyclable materials and sell to recycle collectors. Domestic waste collection and disposed to landfill.</td> </tr> </tbody> </table>	Management Plan	Category	Action Plan	Waste	Domestic	Collect recyclable materials and sell to recycle collectors. Domestic waste collection and disposed to landfill.	Complied
Management Plan	Category	Action Plan							
Waste	Domestic	Collect recyclable materials and sell to recycle collectors. Domestic waste collection and disposed to landfill.							

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Criterion / Indicator		Assessment Findings			Compliance
				Create awareness among the residents.	
		Industrial		Monitoring of collection and application. Disposal scrap iron thru region office. Monthly submission of effluent sample to certified laboratory. EFB application in the field.	
		Schedule		Maintain inventory for SW storage, e-swiss and manual 5 th schedule. Dispose to license contractors. Labelling SW for empty chemical containers and storage. Properly stored SW at SW store.	
		Clinical		Disposed to licensed contractor and return expired drugs to respective suppliers.	
		Recycle		Store items under lock and key. Disposed thru licensed contractor. Labelling of re-use container with "X". Collection and application in the field.	
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan.	Among the program to promote the positive impact in the estate compound are as follow:			Complied

Criterion / Indicator		Assessment Findings	Compliance																	
	- Minor compliance -	<ul style="list-style-type: none"> a. To reuse water waste from triple rinse for chemical spraying activities. b. To recycle empty chemical container for the spraying purpose. c. Reuse fertilizer bag for loose fruit collection. d. To turn off vehicle engine if idling for a long time. e. To disposed schedule waste to the licensed contractor and to store schedule waste at the SW store under lock and key. 																		
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>- Major compliance -</p>	<p>The estate management has conducted series of training to the workforce regarding on the environment and safety issues. The training was program on annual basis and be amended whenever necessary. The workers exhibited a good understanding regarding on the environment issues especially regarding on the buffer zone spraying prohibition and wildlife illegal hunting. Sighted some of the training records as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Somme</td> <td>Briefing on noise risk assessment report</td> <td>09.11.2020</td> </tr> <tr> <td rowspan="5">Bukit Selarong</td> <td>Training on SDPB Health, Safety & Environment policies to workers.</td> <td>10.02.2021</td> </tr> <tr> <td>Inductive training for new workers</td> <td>03.02.2021</td> </tr> <tr> <td>Chemical Spillage Training</td> <td>13.01.2021</td> </tr> <tr> <td>Scheduled waste training</td> <td>08.03.2021</td> </tr> <tr> <td>Refreshing training (circle sprayer)</td> <td>05.02.2021</td> </tr> </tbody> </table>	Estate	Training	Date	Somme	Briefing on noise risk assessment report	09.11.2020	Bukit Selarong	Training on SDPB Health, Safety & Environment policies to workers.	10.02.2021	Inductive training for new workers	03.02.2021	Chemical Spillage Training	13.01.2021	Scheduled waste training	08.03.2021	Refreshing training (circle sprayer)	05.02.2021	Complied
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Criterion / Indicator		Assessment Findings			Compliance
			Refreshing training (pump spray)	26.11.2020	
		Bukit Hijau	Training on SDPB Health, Safety & Environment policies to workers.	03.01.2021	
			Safe working training on spraying activities.	16.01.2021	
			Safe working training on manuring for mature palm.	02.02.2021	
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	Meeting where their concerns about the environmental was conducted together with OSH meeting.			Complied
		Estate	No of Meeting	Date	
		Somme	First meeting, participants 15, absent 8.	15.01.2021	
			Second meeting, participants 19, absent 3.	12.04.2021	
		Bukit Hijau	First meeting was conducted on, participated by 16, absent by 12.	18.03.2021	
		Bukit Selarong	First meeting, participants 20, absent 12.	19.03.2021	
Criterion 4.5.2: Efficiency of energy use and use of renewable energy					
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There	The estate management has established Energy Management Plan to monitor and optimize the consumption of non - renewable energy. Sighted the records as follow:			Complied

Criterion / Indicator		Assessment Findings	Compliance																																																												
	<p>should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.</p> <p>- Major compliance -</p>	<p>Diesel Consumption for 2021.</p> <table border="1"> <thead> <tr> <th colspan="2">Bukit Selarong</th> <th colspan="2">Somme</th> <th colspan="2">Bukit Hijau</th> </tr> <tr> <th>Month</th> <th>kW/FFB</th> <th>Month</th> <th>kW/FFB</th> <th>Month</th> <th>kW/FFB</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>2.61</td> <td>Jan</td> <td>3.48</td> <td>Jan</td> <td>3.87</td> </tr> <tr> <td>Feb</td> <td>1.89</td> <td>Feb</td> <td>1.73</td> <td>Feb</td> <td>3.062</td> </tr> <tr> <td>Mar</td> <td>1.51</td> <td>Mar</td> <td>1.70</td> <td>Mar</td> <td>3.382</td> </tr> </tbody> </table> <p>Electrical Consumption for 2021.</p> <table border="1"> <thead> <tr> <th colspan="2">Bukit Selarong</th> <th colspan="2">Somme</th> <th colspan="2">Bukit Hijau</th> </tr> <tr> <th>Month</th> <th>kW/FFB</th> <th>Month</th> <th>kW/FFB</th> <th>Month</th> <th>kW/FFB</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>1.013</td> <td>Jan</td> <td>4.79</td> <td>Jan</td> <td>2.87</td> </tr> <tr> <td>Feb</td> <td>1.008</td> <td>Feb</td> <td>4.35</td> <td>Feb</td> <td>2.83</td> </tr> <tr> <td>Mar</td> <td>1.51</td> <td>Mar</td> <td>5.65</td> <td>Mar</td> <td>2.17</td> </tr> </tbody> </table>	Bukit Selarong		Somme		Bukit Hijau		Month	kW/FFB	Month	kW/FFB	Month	kW/FFB	Jan	2.61	Jan	3.48	Jan	3.87	Feb	1.89	Feb	1.73	Feb	3.062	Mar	1.51	Mar	1.70	Mar	3.382	Bukit Selarong		Somme		Bukit Hijau		Month	kW/FFB	Month	kW/FFB	Month	kW/FFB	Jan	1.013	Jan	4.79	Jan	2.87	Feb	1.008	Feb	4.35	Feb	2.83	Mar	1.51	Mar	5.65	Mar	2.17	
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4.5.2.2	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p>- Major compliance -</p>	<p>The estimation of direct usage of non-renewable energy for their operations, including fossil fuel and electricity were reflected in the estate’s annual budget respectively. The annual budget was made available to the audit team and verified.</p>	Complied																																																												
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p>	<p>No renewable energy applied in the estate compound.</p>	Complied																																																												

Criterion / Indicator		Assessment Findings	Compliance															
- Minor compliance -																		
Criterion 4.5.3: Waste management and disposal																		
4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<p>SDP has developed procedure for waste management, "Landfill Management in Estate", doc no: SD/SDP/PSQM(ESH)203-EN7, dated on 13.03.2017 and</p> <p>The procedures have identified the type of waste and their category.</p> <table border="1"> <thead> <tr> <th>Waste Code</th> <th>Waste Type</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>SW 102/103</td> <td>Batteries.</td> <td>Lead/cadmium (AAA)</td> </tr> <tr> <td>SW 109/110</td> <td>Waste with mercury / e -waste / light bulb.</td> <td>Waste with mercury, pendaflour, bulb, thermostat, thermometers.</td> </tr> <tr> <td>SW 306/305</td> <td>Lubricant</td> <td>-</td> </tr> <tr> <td>SW 403</td> <td>Clinical waste</td> <td>Discarded drug, syringe</td> </tr> </tbody> </table>	Waste Code	Waste Type	Description	SW 102/103	Batteries.	Lead/cadmium (AAA)	SW 109/110	Waste with mercury / e -waste / light bulb.	Waste with mercury, pendaflour, bulb, thermostat, thermometers.	SW 306/305	Lubricant	-	SW 403	Clinical waste	Discarded drug, syringe	Complied
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SW 403	Clinical waste	Discarded drug, syringe																
4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>a) Identifying and monitoring sources of waste and pollution</p> <p>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</p> <p>- Major compliance -</p>	<p>Waste management plan was made available to the audit team.</p> <table border="1"> <thead> <tr> <th>Type / Location</th> <th>Action</th> </tr> </thead> <tbody> <tr> <td>Rubbish from workers housing complex, workshop, store, shop.</td> <td>Collect recyclable materials and call recycle collectors</td> </tr> <tr> <td></td> <td>Collect other domestic waste from office and line site in black bins and send to landfill</td> </tr> </tbody> </table>	Type / Location	Action	Rubbish from workers housing complex, workshop, store, shop.	Collect recyclable materials and call recycle collectors		Collect other domestic waste from office and line site in black bins and send to landfill	OFI									
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Criterion / Indicator		Assessment Findings		Compliance
			Create further awareness on recycling among employee through training and recycling campaigns.	
			Monitoring estate quarters.	
		Sewage (Septic tank)	To monitor during housing inspection and from resident's complaint.	
		Scrap metal	Labelling permanent signages.	
		Pesticide chemical containers, fertilizer bag (inner) Spent chemical.	Maintain inventory for storage as SW. Record of disposal to appointed contractors.	
		Clinical waste	Disposed off the item to licensed contractor.	
		Empty chemical container – reuse	Establish coding system for traceability of chemical container.	
			Store items under lock and key	
			Dispose of through registered purchased check frequently	
			Labelling reuse empty container with "X"	
		During the site visit, it was observed that the inner plastic of fertilizer bags was found at the hut inside the oil palm field. Estate could improve proper collection system to manage this situation.		

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Criterion / Indicator		Assessment Findings	Compliance
		Implementation of managing used inner plastic bag of fertilizer could be improved in the field area (Bukit Selarong Estate, Somme Estate)	
4.5.3.3	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. - Major compliance -	Sime Darby Plantation Berhad has developed Chemical Safety Management with the objective to define the requirement for the procurement, transportation, receiving, handling, storage, disposal and training on the handling or use of chemicals. All estates have proper schedule waste store and the wastes are disposed thru the licensed contractors. Store for schedule waste inspected by the estate management on regular basis.	Complied
4.5.3.4	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. - Major compliance -	Sime Darby Plantation Berhad has established a safe working procedure for Mixing, Storage & Disposal, Chemical Dispensing Procedure, ref no: BHE/0C/SOP-V2-19-2020. In this procedure, it was mentioned that the empty chemical container shall be triple rinsed with clean water. The rinsed water must be collected and contained in a special container and will be reused for spraying activities. The container must be punctured if not be used for recycle. The empty container also be labelled and properly stored. It was observed during the site visit that, the empty containers were labelled and punctured as per required by the guidelines.	Complied
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance -	Domestic waste was disposed inside the estate compound. It was observed that the landfill was fenced and the signboard was erected.	Complied
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid	The estate management has conducted assessment on polluting activities including greenhouse gas emission, schedule waste, solid waste and effluent. Details of the action plan was tabulated in the table	Complied

Criterion / Indicator		Assessment Findings	Compliance												
	wastes and effluent. - Major compliance -	under indicator 4.5.1.1. the assessment was reviewed on annual basis and be amended whenever necessary.													
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	<p>Details of the action plan is explained under indicator 4.5.1.1. among the action plan sighted were as follow:</p> <table border="1"> <thead> <tr> <th>Type/Location</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Backhoe / Excavator / tractor</td> <td>To ensure that the usage of machinery/heavy vehicle is minimized, and unnecessary usage is stopped</td> </tr> <tr> <td>To ensure that machinery/heavy vehicle engine is turned off when backhoe is not in use for a long time</td> </tr> <tr> <td>To educate the drivers regarding the importance or reducing emission</td> </tr> <tr> <td rowspan="2">Pesticide</td> <td>To minimize the usage with census, R&D recommendation</td> </tr> <tr> <td>Enhancing the IPM implementation at field</td> </tr> <tr> <td rowspan="2">Fertilizer</td> <td>Strictly follow the R&D recommendation</td> </tr> <tr> <td>Alternative of organic fertilizer with EFB application & mulching</td> </tr> </tbody> </table>	Type/Location	Action Plan	Backhoe / Excavator / tractor	To ensure that the usage of machinery/heavy vehicle is minimized, and unnecessary usage is stopped	To ensure that machinery/heavy vehicle engine is turned off when backhoe is not in use for a long time	To educate the drivers regarding the importance or reducing emission	Pesticide	To minimize the usage with census, R&D recommendation	Enhancing the IPM implementation at field	Fertilizer	Strictly follow the R&D recommendation	Alternative of organic fertilizer with EFB application & mulching	Complied
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Criterion 4.5.5: Natural water resources															
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources	Sime Darby Plantation Berhad has established Water Monitoring Procedure, doc no: SD/SOP/PSQM(ESH)/203-EN4, REV: 0, dated on	Complied												

Criterion / Indicator	Assessment Findings	Compliance
<p>(surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate. e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. <p>- Major compliance -</p>	<p>26.02.2015. besides, SDP also developed a sampling procedure, Water & Wastewater Sampling Procedure, endorsed by Head of Lab Services, issued on 01.06.2016.</p> <p>Main water supply comes from Syarikat Air Darul Aman Sdn Bhd.</p> <p>As for Bukit Hijau Estate and Somme Estate, no rivers were recorded flowing across the estate compounds, thus no water monitoring were conducted.</p> <p>Two rivers flowing across the Bukit Selarong Estate compound which are Sungai Sedeli and Sungai Jemerli. Water supply for domestic consumption comes from Syarikat Air Darul Aman Sdn Bhd (SADA). Latest water sampling was conducted on 12.03.2021, analysed by Sime Darby Research Sdn Bhd. The results show no harmful parameters were detected.</p> <p>Under HCV Environmental Management Plan, it was stated Action Plan that no chemical intervention and manuring shall be carried out only manual weeding is allowed.</p>	
<p>4.5.5.2 No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p>- Minor compliance -</p>	<p>No bunds, weirs or dams were sighted across main rivers and waterways in all estates.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). - Minor compliance -	The practice water harvesting of water from road-side drains being directed and stored in conservation road side pits was observed in all estates.	Complied
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value			
4.5.6.1	Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover: a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (<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. - Major compliance -	Sime Darby Plantation Berhad has conducted HCV and Biodiversity Assessment for all operating units by SDP-PSQM Department with support from R&D Department. As of to date, no rare, threatened and endangered species were found roaming in the estate compound except for the common species such as monkey, snakes, birds and wild boar.	Complied
4.5.6.2	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include: a) Ensuring that any legal requirements relating to the protection of the species are met.	According to the HCV Environmental Management Plan, if any case of interface with wildlife or signs of wildlife entering the estate compound, the estate management shall be reported to Wildlife Department immediately. The estate also will conduct awareness training that the workers will be taught to not disturb or hunt any wildlife.	Complied

Criterion / Indicator	Assessment Findings	Compliance
b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. - Major compliance -		

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Criterion / Indicator		Assessment Findings				Compliance							
<p>4.5.6.3</p> <p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p>	<p>HCV Environmental Management Plan was made available to the audit team and verified. Sample of the plan are as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 15%;">Management Plan</th> <th style="width: 30%;">Objective</th> <th style="width: 20%;">Location</th> <th style="width: 35%;">Action Plan</th> </tr> </thead> <tbody> <tr> <td>HCV Environmental</td> <td> <p>To maintain buffer one marker with white paint.</p> <p>To conduct buffer zone training for sprayers</p> <p>To promote awareness on HCV</p> <p>To monitor and record the wildlife.</p> </td> <td> <p>Buffer zone and natural waterways</p> <p>Awareness</p> <p>Wildlife monitoring</p> <p>HCV / conservation area.</p> </td> <td> <p>Marking the oil palm trunk with white paints.</p> <p>To conduct training to spraying geng.</p> <p>Monitoring HCV and conservation areas.</p> <p>Briefing on policy regarding the HCV and environment</p> </td> </tr> </tbody> </table>				Management Plan	Objective	Location	Action Plan	HCV Environmental	<p>To maintain buffer one marker with white paint.</p> <p>To conduct buffer zone training for sprayers</p> <p>To promote awareness on HCV</p> <p>To monitor and record the wildlife.</p>	<p>Buffer zone and natural waterways</p> <p>Awareness</p> <p>Wildlife monitoring</p> <p>HCV / conservation area.</p>	<p>Marking the oil palm trunk with white paints.</p> <p>To conduct training to spraying geng.</p> <p>Monitoring HCV and conservation areas.</p> <p>Briefing on policy regarding the HCV and environment</p>	<p>Complied</p>
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<p>Criterion 4.5.7: Zero burning practices</p>													

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Criterion / Indicator		Assessment Findings	Compliance
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 -	No fire marks were observed during the site visit. As for replanting program, the estate management chipped the felled trunk in order to make it decay.	Complied
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 since there is no fire been used.	Complied
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance -	Not applicable since there is no fire been used.	Complied
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	The estate management chipped and shredded the oil palm trunk during the replanting program.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.	Sime Darby Plantation Berhad has established estate and mill standard operation procedures which were prepared for the group basis. Among the documentation identified as follow:	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>a. Estate quality management system standard operation manual.</p> <p>b. EQMS quality management manual.</p> <p>c. Standard operation procedure</p> <p>d. Work instructions.</p> <p>e. Records.</p> <p>Person in charge will record every completed work or task assigned to them and later submitted to the estate management for verification and approval. Sighted the record for FFB evacuation from the platform to the ramp, weight bridge and to the mill.</p> <p>Besides that, as part of the monitoring purposes, the estates also receive visit from Estate General Manager and Plantation Advisor to ensure the implementation of the standards are in order.</p>	
4.6.1.2	<p>Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.</p> <p>- Major compliance -</p>	<p>Oil palm are planted on the permitted level of sloping land and during the site visit, it was observed that the estate management has taken necessary action to avoid soil erosion incident. Terraces are constructed inclined towards the terrace wall.</p>	Complied
4.6.1.3	<p>A visual identification or reference system shall be established for each field.</p> <p>- Major compliance -</p>	<p>Fields are marked and identified. Information like year planting (field no) and the total hectare is shown in all markers.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance																								
Criterion 4.6.2: Economic and financial viability plan																											
4.6.2.1	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p>- Major compliance -</p>	<p>The annual business plan is available as per Group Financial Procedures and Guidelines. The budget contains palm per year of planting, age categories and projection of FFB production. Among the component in the annual budget includes:</p> <ol style="list-style-type: none"> Administration. Harvesting and collection. Field upkeep and transportation. Roads and bridges. Labour overhead EVIT (running accounts for engines, vehicles, tractors and implementations). <p>Capital expenditure (replacement/upgrading building, vehicle replacements, worker’s amenities, etc.</p>	Complied																								
4.6.2.2	<p>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.</p> <p>- Major compliance -</p>	<p>Current estate replanting program as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Bukit Selarong</td> <td>353.88</td> <td>318.20</td> <td>357.08</td> <td>324.21</td> <td>252.90</td> </tr> <tr> <td>Bukit HIjau</td> <td>251.06</td> <td>227.15</td> <td>178.94</td> <td>113.36</td> <td>-</td> </tr> <tr> <td>Somme</td> <td>84.63</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>	Estate	2022	2023	2024	2025	2026	Bukit Selarong	353.88	318.20	357.08	324.21	252.90	Bukit HIjau	251.06	227.15	178.94	113.36	-	Somme	84.63	-	-	-	-	Complied
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Somme	84.63	-	-	-	-																						
4.6.2.3	<p>The business or management plan may contain:</p> <ol style="list-style-type: none"> Attention to quality of planting materials and FFB Crop projection: site yield potential, age profile, FFB yield trends 	<p>The items required are reflected in the annual budget of each estates and brief explanation is provided under indicator 4.6.2.1 above.</p>	Complied																								

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Criterion / Indicator		Assessment Findings	Compliance
	c) Cost of production : cost per tonne of FFB d) Price forecast e) e) Financial indicators : cost benefit, discounted cash flow, return on investment - Major compliance -		
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -	The estate received visits from plantation advisor, general manager, and agronomist. Sighted the reports from the visitors as evidence of monitoring. Sighted monthly report that submitted to HQ.	Complied
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Sampled the letter of award (LOA) for services provided as below: 1. Company Name: Zaitunizan Binti Mahmud Husin for External Transport FFB, Harvesting contract and Pruning at 97A in Somme Estate which validity were updated on monthly basis. 2. Company Name: HHL Enterprise for FFB loading, transport to Mill for Bukit Selarong Estate which valid until 30/06/2021. 3. Company Name: Ponraja A/L Sinnathamby for loose fruit collection, supply lorry & transport workers in Bukit Selarong Estate which valid until 31/12/2021. Pricing of the contract was stated in the LOA and acknowledged by the contractors.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.	Verified the invoice submitted and payment records as below: 1. Somme Estate: Tax INV# Z0443 dated 31/03/2021; Payment made on 01/04/2021 with Transaction Ref.: 521448290100970	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>2. Bukit Selarong Estate: Tax INV# PON/2021/0003 dated 31/03/2021; Payment made on 02/04/2021 with Transaction Ref.: 521744140100658</p> <p>Besides, interviewed with contractors also confirmed that payment was made promptly.</p>	
Criterion 4.6.4: Contractor			
4.6.4.1	<p>Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- Major compliance -</p>	<p>The contractors engaged by the estate management has signed on a letter with subject RSPO/ ISCC/ MSPO/ SCCS dated 18/01/2021.</p> <p>MSPO training has been given to hired contractors. Refer Training "Garis Panduan Pembekalan Bertanggungjawab SDP, RSPO & MSPO" dated 02/02/2021. Sighted evidence of training material and attendance list.</p>	Complied
4.6.4.2	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p>- Major compliance -</p>	<p>Somme Estate</p> <p>Sighted contract agreement External Transport FFB from Somme to SDM Document number 4300536713 dated 01/04/2021. The contact validity updated on monthly basis.</p> <p>Sighted contractor's workers from AMZ Gemilang Enterprise Husin found that the salary and wages were in order.</p> <p>Bukit Selarong Estate</p> <p>Sighted contract agreement External Transport FFB for Zaitunizan Binti mahmud Husin dated 01/01/2021. The contact valid from 01/01/2021 to 30/06/2021.</p> <p>Bukit Hijau Estate</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Sighted contract agreement External Transport FFB for Mayang Bayumas Sdn Bhd dated 01/01/2021. The contact valid until 31/12/2021.	
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	A letter dated 18/01/2021 on RSPO/ ISCC/ MSPO/ SCCS signed by Senior Manager of estate to all the contractors and suppliers in the estate. The letter has stated that all Contractors need to follow RSPO/ ISCC/ MSPO/ SCCS guideline in accordance with the Sime Darby Plantation of Estate Quality Management System. All contractors shall provide access to the RSPO/ ISCC/ MSPO/ SCCS auditors to contractors' operation site(s) and employees whenever deemed necessary. The contractors have agreed, understood and acknowledged on the letter. Sampled of the letters for AMZ Gemilang Enterprise, HHL Enterprise Sdn Bhd and Zaitunizan Binti Mahmud Husin were sighted.	Complied
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	All work performed at the estates are checked and verified by the estate's personnel. Projects where tenders are issued by HQ are checked by representative from HQ. Payment were handle by HQ and during interview with contractor, verified that there is no issue on payments method and period. Sample document checked: 1. AMZ Gemilang Enterprise 2. Zaitunizan Binti Mamud Husin 3. Mayang Bayumas Sdn Bhd Sighted details of transaction references, Payer name, Acc Number and Amount of payment.	Complied
4.7 Principle 7: Development of new planting (Not Applicable)			

B) MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	Sime Darby Plantation Berhad has issued an inter-office mail (Ref. No.: SQM.RSPO.1811/22.11) dated 23/11/2018 regarding the statement on commitment towards MSPO implementation by Head, Global Sustainability Operations, Mr. Tang Men Kon. Sime Darby Plantation Berhad is committed to comply and implement the MSPO certification to demonstrate our commitment towards the production of certified sustainable palm oil products.	Complied
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	Sime Darby Plantation Berhad has clearly emphasized to achieve commitment towards a systematic approach in ensuring continuous improvement in the operation, compliance to statutory, legal and other regulatory requirements and establishment of traceability within the supply chain in the above-mentioned memorandum.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Seen the notification of internal audit SOU 1 sent out by the Sustainability Compliance Unit on 18/01/2021. Sighted MSPO Internal Audit for Sg Dingin Palm Oil Mill dated 16/02/2021 by GSD Malaysia & Northern RSQM. The audit was carried out based on the reference of MS 2530-4:2013. Total 5 major, 5 minor non-conformity and 2 Opportunity for Improvement raised.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Seen the Internal Audit Report with root cause identified for the non-conformities and OFIs raised. All the non-conformities and OFIs were closed accordingly on 01/03/2021.	
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	Sime Darby Plantation Berhad has developed Internal Audit Procedure, Doc. No.: SD/SDP/PSQM/IAP, Rev. 2 dated 01/11/2017. The frequency of the internal audit shall be carried out at least once a year and when is required. Total 5 major, 5 minor non-conformity and 2 Opportunity for Improvement raised. Seen the Internal Audit Report with root cause identified for the non-conformities and OFIs raised. All the non-conformities and OFIs were closed accordingly on 01/03/2021.	Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	The internal audit report has distributed to the mill's management. The Management Representative has acknowledged on the acceptance of the Internal Audit Report on 16/02/2021. Management review meeting was conducted to review the findings of the internal audit.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	The latest management review meeting was carried out on 13/04/2021 in Meeting Room Sg Dingin POM which chaired by Mill Manager where the agenda that discussed as below: 1. Introduction - Opening Action by Chairman 2. Matters Arising 3. Review on operational input and output	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		4. Sustainability management 5. Changes that could affect the management system 6. Recommendation for improvement 7. Any other matters. 8. Any other matters Management review minutes of meeting, attendance list and presentation was sighted as well.	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	Sighted continual improvement plan for the year of 2021 has been established by Mill 1. Social management plan (Gender and NUPW) dated 30/03/2021 2. Identification and management of wastewater for financial year 2021 dated 15/01/2021 3. Pollution prevention plan dated 15/01/2021 4. Water reduction management programme year 2021 dated 06/01/2021 5. Energy management Plan FY 2021 dated 15/01/2021 6. Water management pln FY 2021 dated 15/01/2021 7. Training Plan 2021 Social, Safety and Health & Environment 8. Waste Management Action Plan FY 2021 dated 15/01/2021	Complied
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	The mill is in the progress to check defect of the Electrostatic Precipitator System for controlling the smoke emission as per memo circulated dated 22/08/17. The information provided in Written Notification on Air Emission Sources (Air Pollution Control System-	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Electrostatic Precipitator). The purpose is to improve the effectiveness of this new technology.	
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	Sime Darby Plantation has developed Estate Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 1, issue date 1/4/2008). The procedure has detailing the process of handling complaints from stakeholders and the time frame for external communication to be dealt with. The time frame to provide feedback is within two weeks of the date of receipt for communication and within one week of the completion of the investigation. The management has briefed the workers and stakeholders during the Town Hall 2020 dated 17/08/2020 regarding on the communication and complaint procedures.	Complied
4.2.1.2	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. - Major compliance -	Publicly available management documents such as land titles, OHS plans, EIA and SIA reports, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans are available. All operating units have individual documents and records to demonstrate compliance to this indicator. Sustainability Reports, policies and procedures are also accessible through the company's website: http://www.simedarbyplantation.com/ .	Complied
Criterion 4.2.2 – Transparent method of communication and consultation			

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Criterion / Indicator		Assessment Findings	Compliance
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation has developed Estate Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 1, issue date 1/4/2008) to put in place a system to effectively communicate with external interested parties on matters pertaining to performance. Timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation.</p> <p>Besides, the company has developed a documented procedure in Sustainable Plantation Management System on handling social issues, Appendix 5, Version 1, and Issue No.1, dated 01/04/2008. The procedure has detailing the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner.</p>	Complied
4.2.2.2	<p>The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i>.</p> <p>- Minor compliance -</p>	<p>Mr Mohd Shazwan Afiq Mohd Roffi, Assistant Manager of the Sg Dingin POM has been appointed as Social Officer to handle any issue related to social in the mill. Seen the appointment letter dated 01/01/2021 issued by the Mill Manager. Role and responsibilities were clearly stated in the appointment letter.</p>	Complied
4.2.2.3	<p>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.</p> <p>- Major compliance -</p>	<p>Stakeholder list was developed with relevant stakeholders such as local communities, government authorities, NGOs, contractors and suppliers were included in the list. The list was updated on 15/01/2021 and verified by Mill Manager.</p> <p>A stakeholder meeting for Sg Dingin POM was not conducted due to movement restriction however Mill were use another solution which is distributed information of MSPO and feedback form to gain information from related smallholders. Sighted evidence of Letter</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		"Penerangan Pensijilan RSPO/MSPO dan Maklum Balas Pihak Berkepentingan (Stakeholder)" dated 17/03/2021. Refer sample letter to Nexconn Engineering and Construction, Perabut Nur, Krisnan Ranmos Enterprise, Balai Polis Mahang, Pejabat Renjer Hutan Kulim Pahau Jalan Karangan, Jabatan Alam sekitar Cawangan Kulim, Bali Bomba Kulim etc.	
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance -	Sime Darby Plantation Sdn Bhd has established a traceability procedure, Sustainable Supply Chain & Traceability SOP, version: 02, Year: 2018, issue no: 5, date: April 2019. The scope of this SOP is applicable for the handling of certified sustainable FFB, CPO, PK and waste/residue material by the estates, palm oil mills, bulking installations, outsourced contractors and other relevant Support Service Departments of Sime Darby Plantation Malaysia operation.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The mill management conducted inspection on daily basis. Weighbridge clerk will prepare the daily document regarding on the FFB receive and the mill assistant manager will go thru the documents and later will be verified by the mill manager. Sample of FFB received record were sighted and verified. Details as in indicator 4.2.3.4.	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	The mill management has been assigned Mr. Mohd Shazwan Afiq Mohd Roffi (mill assistant engineer) as responsible person to implement and maintain traceability system.	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.	Records of sales, FFB received or transportation of CPO/PKO has been made available to the audit team. Records were sighted and verified.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p><u>FFB Received:</u> FFB Received Ticket No: 249337 Date: 19.04.2021 Weight: 7.39 mt FFB Consignment Note No: 13966 Date: 19.04.2021 Vehicle No: ALR8677 Driver's Name: Amiruddin Security Seal No: 066444 Weighbridge Ticket No: 873</p>	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>Licenses and permits for mill operation has been made available to the audit team.</p> <ol style="list-style-type: none"> DOE license no: 003648, expired on 30.06.2021. The processing capacity allowed for the mill to process is 80 Mt per hour. Mill throughput records at 74.488 Mt/hour (to-date) and 75.521 Mt/hour (year to-date) "Permit Barangan Kawalan Berjadual", serial no: K001221, ref no: KPDNHEP.KLM(P)01/2005, approved limit for diesel storage 18500 litre, expired on 23.10.2021. 	Complied

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Criterion / Indicator		Assessment Findings	Compliance												
		<p>4. "Lesen Bagi Pemasangan Persendirian", serial no: 477019, license no: 2020/02851, expired on 18.12.2021.</p> <p>5. MPOB license no: 530978004000, expired on 30.06.2022.</p> <p>6. "Permit Kerja Lebih Masa", reference no: BHG.PU/9/134JLD9(11). Agreement letter on overtime work were made available to the auditor. The workers are as follow:</p> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>Name</th> <th>IC No</th> <th>Work Station</th> </tr> </thead> <tbody> <tr> <td>Devagi Marimuthu</td> <td>D/O 780902-02-xxxx</td> <td>USB</td> </tr> <tr> <td>Sitra Ranggannagan</td> <td>D/O 790301-08-xxxx</td> <td>Lab</td> </tr> <tr> <td>Letchumi Kaliappan</td> <td>D/O 780425-08-xxxx</td> <td>Lab</td> </tr> </tbody> </table> <p>Fire certificate from BOMBA no: JBPM:KD/7/3/2017, serial no: 31563 expired on 18.08.2021.</p>	Name	IC No	Work Station	Devagi Marimuthu	D/O 780902-02-xxxx	USB	Sitra Ranggannagan	D/O 790301-08-xxxx	Lab	Letchumi Kaliappan	D/O 780425-08-xxxx	Lab	
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Sitra Ranggannagan	D/O 790301-08-xxxx	Lab													
Letchumi Kaliappan	D/O 780425-08-xxxx	Lab													
4.3.1.2	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>The estate management has listed and recorded all laws applicable to their operation in a Legal & Other Regulation Requirements. Group Sustainability Department (at head quarter level) will update the region office - estates & mills, should there be any new law or amendment coming into force.</p> <p>Among the legal and regulation sighted are as follow:</p> <ol style="list-style-type: none"> 1. Occupational Safety & Health Act 199 2. Factories and machinery Act 1967 	Complied												

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Criterion / Indicator		Assessment Findings	Compliance
		3. Fire Services Act 1988 (Act 341) Amendment 2018 4. Pesticides Act 1974 (Act 148) 5. Poisons Act 1952 (Revised 1989) (Act 366) 6. Environment Quality Act 1974 (Act 127) 7. Water Act 1920 (Act 418) 8. Labour Act 1955 Revision and amendment of law & regulation. 1. Akta Pencegahan Dan Kawalan Penyakit Berjangkit 1988 (pindaan 2020) 2. Perintah Kawalan Pergerakan 2020 3. Arms Act 1960 (revision 2019)	
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	The Sime Darby Plantation Berhad Headquarters will update each region whenever they received any update regarding on the new regulations or new amendment laws coming into force. Thru the headquarters' representative which were based in each region, the information will be distributed among the operating unit (estate/mill).	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. - Minor compliance -	The mill management has been assigned Mr. Mohd Shazwan Afiq Mohd Roffi (mill assistant engineer) as responsible person to monitor compliance and to track update the changes in regulatory requirements. Appointment was made on 01.11.2020.	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.	Sg Dingin POM is located inside of the land of Sg Dingin Estate. The land is belonging to Sime Darby Plantation (Peninsular) Sdn Bhd.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Sighted the copy of the land title. There is no issue on land use claims evidence during the audit.	
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	Sg Dingin POM is located inside of the land of Sg Dingin Estate. The land is belonging to Sime Darby Plantation (Peninsular) Sdn Bhd. Sighted the copy of the land title. There is no issue on land use claims evidence during the audit.	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Legal boundary along the mill were demarcated with fences. Land title was under estate	Complied
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no land dispute in the Sg Dingin POM at the time of audit. The land belongs to Sime Darby Plantation (Peninsular) Sdn Bhd and land ownership documents verified. Interviewed with the local communities confirmed that no land encroachment.	Complied
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary land or negotiated agreements within the Sg Dingin POM land area. Interviewed with the local communities confirmed that no land encroachment.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	The right to use the land is not disputed and there was no customary land within the Sg Dingin POM. Interviewed with the local communities confirmed that no land encroachment.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	There is no land dispute or customary rights issues in the mill. Interviewed with the local communities confirmed that no land encroachment.	Complied
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	<p>SIA was conducted on 23/02/2021 to 05/03/2021 for SOU 1 Sg Dingin POM and Supply Bases by Social & Environment Projects Unit, PSQM Department. The methodology of the assessment was through field interview with stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, schools' representatives, officers from government authorities and internal workers. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community, education, safety and health, living condition, infrastructure and amenities and stakeholder engagement were assessed accordingly.</p> <p>Social management plan was developed in Sg Dingin POM on 30/03/2021 after the management review meeting. The management plan was developed after collected the feedbacks and issues during various of meeting such as stakeholder meeting, union meeting and gender committee meeting.</p>	Complied
Criterion 4.4.2: Complaints and grievances			

Criterion / Indicator		Assessment Findings	Compliance
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in https://www.simedarbyplantation.com/corporate/whistleblowing. Besides, the company has implemented "Suara Kami" as a platform for the workers to raise any issue. Besides, the managements have briefed the stakeholders during stakeholder meetings on the procedure of complaint.</p>	Complied
4.4.2.2	<p>The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties.</p> <p>- Major compliance -</p>	<p>Sg Dingin POM has implemented Complaint Book to record any complaints from internal and external stakeholders. Sampled of the complaints as below:</p> <p>Sample 1</p> <p>Issue: Grassy at Linesite reported on 25/04/2020.</p> <p>Status: Grasscutting has been conducted 29/04/2020.</p> <p>Sample 2</p> <p>Issue: "Kehilangan Cermin Tingkap di WQ 30 A reported on 27/01/2020.</p> <p>Status: Replaced by management on 29/01/2020.</p>	Complied
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.</p> <p>- Minor compliance -</p>	<p>Sg Dingin POM has implemented Complaint Book to record complaints and requests reported by the stakeholders. The complaint book is available at the guard post. Interviewed with the</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Auxiliary Police and one of the workers confirmed that the complaint book is available at the guard post.	
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - Minor compliance -	Interviewed with the internal and external stakeholders during stakeholder consultation found that they were aware of the complaint procedure and they were briefed by the management. The management has briefed the workers and stakeholders during the Town Hall 2020 dated 17/08/2020 regarding on the communication and complaint procedures.	Complied
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance -	Record review found that previous complaints and requests from Year 2018 were still available.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	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. - Minor compliance -	The mill management has offered majority job opportunity to the local communities by verified through employee master listing. Besides, the management has provided 10 kgs of rice every 2 months to the workers. Seen the records of rice distribution. Latest record on 02/04/2021.	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.	The group has developed a Group Sustainability & Quality Policy Statement, endorsed by Mr. Mohamad Helmy Othman Basha on 02.12.2019. The statement indicated their commitment to provide safe and healthy workplace and protecting worker's welfare.	Complied

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Criterion / Indicator		Assessment Findings					Compliance
	- Major compliance -	ESH plan was sighted as below (samples):					
		Management Plan	Objectives	Regulation	Activity	Actions	
		Awareness & competency training	To conduct training for all workers Transportation safety in the estate and road To send workers for a Competent First Aid Training	OSHA Sec. 15	First aid training Transport safety training Defensive training	Manager & Assistant Managers	
		Emergency Preparedness Response	To appoint EPR team member To review effectiveness of EPR team roles & responsibility	PSQM -ESH	Appoint EPR team member Review of EPR team roles and responsibility	Manager & Assistant Managers	

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Criterion / Indicator		Assessment Findings					Compliance
		Chemical safety management	To coordinate CHRA exercise Register of chemical used. Verification implementation of CHRA recommendation	USEC HH reg. 5 PSQM -ESH USEC HH re 27	Conduct CHRA Review on chemical register Conduct health surveillance.	Manager & Assistant Managers	
		Implementation of ESH management plans at the ground root are satisfying. The workers are able to demonstrate fair understanding regarding on the safety issues. Also sighted the training records conducted by the mill management to the workers.					
4.4.4.2	The occupational safety and health plan should cover the following: a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: i. All employees involved are adequately trained on safe working practices;	1. Sighted the safety & health policy and safety training records conducted by the management. i. SCCS SOP & policy training, 04.02.2021. ii. SOP training: Hopper station, 09.03.2021 iii. SOP training: sterilizer station, 09.03.2021 iv. SOP training: press station, 22.03.2021 v. SOP training: Boiler & Engine, 11.03.2021					OFI

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Criterion / Indicator	Assessment Findings	Compliance
<ul style="list-style-type: none"> ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements. g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept and the concerns of employees and any remedial actions taken shall be recorded. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite. 	<ul style="list-style-type: none"> 2. HIRARC for the mill was sighted and reviewed which cover all operation and non – operation activities such as reception station/weighbridge station, fruit handling, boiler house, engine room, laboratory, effluent treatment pond and office. 3. Training and awareness program for the laboratory workers has been conducted on need basis. There were about 11 workers including 1 staff who were in charged for laboratory. 2 trainings were conducted, i) SOP training: Laboratory on 15.02.2021 and schedule waste training on 12.04.2021. 4. The mill management has issued PPE to their workers based on their job scope and work station. Common PPE provided by the mill management are safety boots, safety helmets, gloves, earplugs, mask and harness. PPE issuance records has been sighted and reviewed. The mill could improve the safety condition by enforcing all workers to used PPE especially safety boots while performing their job e.g. grading FFB at receiving ramp. Mill management could improve of PPE awareness and usage while carried out task or job from outsiders. 5. SOP for handling chemical has been made available to the audit team. The SOP covers topic as follow; selection of chemicals, assessment of chemicals hazard, selection of supplier and transportation of chemicals storage & handling and chemical disposal. 6. The management has appointed Mr. Mohd Syazwan Mohd Raffi as the person in charge for workers safety and health. The appointment was made on 01.11.2020. 	

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Criterion / Indicator	Assessment Findings	Compliance
<p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>7. First OSH meeting was conducted on 25.01.2021, attended by 15 participants. Next OSH meeting will be conducted on 25.04.2021. Among the agendas discussed in the meeting were,</p> <ul style="list-style-type: none"> i. Unsafe act and unsafe condition report. ii. Environmental report iii. Health issues report iv. First aid box checklist v. Safety report vi. Fire extinguisher report vii. Workshop and laboratory report. <p>8. Accident and emergency procedures were made available to the audit team. The information regarding on the ERP has been briefed by the management to the workers during training session and the morning session. The workers give a good feedback to the audit team which shows that they are well informed and understood the ERP work flow.</p> <p>9. Employees who has undergone with first aid training were presented at their work station during the site visit. It was also observed that they have kept the first aid box and regularly replenished the items when necessary.</p> <p>10. JKKP8 form has been submitted to the DOSH on 01.01.2021. One accident was recorded on 29.07.2020 where Mr. Mujnan (AT790528) has slipped and hurt his finger. He then been rushed to the Hospital Kulim and advised to rest for 3 days. The incident has been discussed in the OSH meeting in year 2020.</p>	

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Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation has established Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC). The HRC was last revised on August 2020. They promote the human rights, safeguard democracy and its institutions and not violate the rights of others. They also recognize the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, they are committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as respond to complaints on any alleged threats made to them. Refer to Policy on the Protection of Human Rights Defenders (HRDs) dated 25/03/2020 for more information. Policy on the Protection of HRDs_FINAL.pdf (simedarwinplantation.com).</p> <p>The policies were communicated to stakeholders during Town Hall 2020 dated 17/08/2020. Besides, the briefing of the policies to workers was briefed during muster call.</p>	<p>Complied</p>
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>Sime Darby Plantation has developed Human Rights Charter to ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at work and providing a platform for workers' voice and social dialogue. They respect the rights of workers and provide fair and favourable</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	working conditions by Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. They will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy could be downloaded from https://www.simedarbyplantation.com/sustainability/human-rights-charter .	
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	There were employment contracts for staffs and workers. Pay and conditions are documented and achieved the Minimum Wage Order 2020. Sime Darby has sign the Collective Agreement with National Union of Plantation Workers (NUPW). 12 Samples of employment contracts are reviewed and the agreements are signed in both English and home country language (i.e. Hindi, Bahasa Malaysia/Indonesia). Upon the foreign workers arriving to the estate, they will be inducted for the terms and conditions of employment contract and briefed on the company's policies.	Complied
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance -	There is no permanent contractor hired by the Mill. Only ad hoc task will be conducted by contractor. Refer Contract Form number 4300534035 dated 12/02/2021 with period of contract 11/02/2021 to 11/03/2021.	Complied
4.4.5.5	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain	The mill management has registered all their workers into Employee Master Details Listing in SEMUA system where personal details such as full name, gender, date of birth, date join company,	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -	race, designation and wages were recorded. Verified the Employee Master Details Listing.	
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records. - Major compliance -	Sample of 12 employment contracts in Sg Dingin POM are reviewed, and the contracts are signed in dual language which is English and their home country language such as Hindi, Bahasa Malaysia/Indonesia. The terms and conditions such as working hours, deduction, overtime, sick leave, holiday entitlement, reason of dismissal and period of notice were outlined in the contract.	Complied
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - Major compliance -	Seen the Mill Daily Attendance Report for February 2020, October 2020 January 2021 and February 2021 where it recorded the number of days work and hours of overtime work. The data was transferred from punch card into the SAP system.	Complied
4.4.5.8	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable. - Major compliance -	Interviewed with the workers confirmed that they have rest time in between of the working hours. Overtimes were paid according to the rate stated in the agreement and regulatory requirements. The overtime offered upon mutually agreement.	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Wages and overtime were paid according to the Mill Daily Attendance Report. Total hours of overtime and daily attendance has recorded in the SAP system and the payslips.	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good	All the workers are provided with free medical facilities. The workers are entitled with the phone allowance of RM 5 for every month. Free housing facilities were provided to all the workers and	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. - Minor compliance -	their families with subsidized water supply. 10kg of rice was supplied to all the workers once every 2 months and confirmed through interviewed with the workers.	
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance -	The mill’s management has provided free housing facilities to all the workers. Basic amenities such as water and electricity were provided to the workers. The mill workers are using SADA water. Linesite inspection was carried out on weekly basis by Supervisor using Housing Complex/ Nest/ Community Hall Inspections. The last inspection for April 2021 was conducted on 16/04/2021, 09/04/2021, 02/04/2021 and 26/03/2021.	Complied
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Sime Darby Plantation has developed Human Rights Charter where they create a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict. The policies were communicated to stakeholders during Town Hall 2020 dated 17/08/2020. Besides, the briefing of the policies to workers was briefed during muster call. Gender Committee has organized meeting and the last meetings were conducted on 25/07/2020, 30/12/2020 and 03/01/2021 in Sg Dingin POM. Issues raised in the mill were incorporated into the social management plan where proposed action were identified.	Complied
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers’ own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective	Sime Darby Plantation has developed Human Rights Charter where they respect Freedom of Association by respecting the rights of employees to form and join unions and bargain collectively. In jurisdictions where this right is limited, they will provide alternative means of employee engagement and grievance redressal.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<p>bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>Union meeting was held on 26/02/2021 with total 21 participants. Issues raised during the meeting were incorporated into the Social Management Plan 2021 and carried forward to Social Management Plan 2022 for issues unresolved.</p>	
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter where they recognise that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography by:</p> <ul style="list-style-type: none"> • Eradicating child labour in our supply chain. They will not employ anyone under the age of 18 years. • Providing process for remedy if children are found working. They will develop a solution that is in the best interest of the child in partnership with qualified organisations. • Recognising that education is a crucial component in effectively eliminating child labour, they commit to providing all our workers' children with access to primary and secondary education. <p>The policies were communicated to stakeholders during Town Hall 2020 dated 17/08/2020. Besides, the briefing of the policies to workers was briefed during muster call.</p>	Complied
Criterion 4.4.6: Training and competency			
4.4.6.1	<p>All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p>	<p>The mill management has established a training program for one year based on the training need analysis. Training on COVID-19 has been conducted continuously since the pandemic is not yet</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	vanished. Training programs and records were sighted been detail in the indicators above accordingly.	
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>	The mill management also established training needs analysis for their workers including the contractors. The training was designed based on their job function and work place. The training needs analysis records were made available and verified.	Complied
4.4.6.3	<p>A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	The mill possessed a yearly training program which will be updated upon necessary. Training program was made available and verified.	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	<p>An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>Environmental management plan was made available to the audit team. 5 plan has been highlighted in the EMP which are:</p> <ol style="list-style-type: none"> 1. Environmental risk management 2. Waste management 3. Water management 4. HCV/Biodiversity management plan. 	Complied

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Criterion / Indicator		Assessment Findings	Compliance																								
		<p>The main objective of these plans was to adhere with the relevant regulation authorized by the government and to ensure the operating unit to follow thru the guidelines.</p> <p>The plan was communicated to all workers during series of briefing and training session.</p>																									
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>- Major compliance -</p>	<p>Environmental policy is available and the objectives stated therein.</p> <p>Aspects and impacts analysis of all operations has been developed and covered in the environmental management plan.</p> <p>Sighted sample of the plan as follow:</p> <table border="1"> <thead> <tr> <th>Aspect</th> <th>Impact</th> <th>Action Plan</th> <th>Time Frame</th> </tr> </thead> <tbody> <tr> <td>Waste management</td> <td>Land pollution</td> <td>To collect recyclable materials and domestic waste to landfill.</td> <td>As and when needed</td> </tr> <tr> <td>a. Domestic waste</td> <td></td> <td>To dispose schedule waste via licensed contractor.</td> <td></td> </tr> <tr> <td>b. Schedule waste</td> <td></td> <td></td> <td></td> </tr> <tr> <td>c. Clinical waste</td> <td></td> <td>Maintain inventory for SW not more than 180 days.</td> <td></td> </tr> <tr> <td>d. Industrial waste</td> <td></td> <td>To store the used oil under lock and key.</td> <td></td> </tr> </tbody> </table>	Aspect	Impact	Action Plan	Time Frame	Waste management	Land pollution	To collect recyclable materials and domestic waste to landfill.	As and when needed	a. Domestic waste		To dispose schedule waste via licensed contractor.		b. Schedule waste				c. Clinical waste		Maintain inventory for SW not more than 180 days.		d. Industrial waste		To store the used oil under lock and key.		Complied
Aspect	Impact	Action Plan	Time Frame																								
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Criterion / Indicator		Assessment Findings				Compliance
		Energy management a. Diesel b. Electricity	Air pollution	To reduce diesel usage and to utilise turbine power to mill processing instead of using supply from TNB. To ensure that the vehicle engine is turned off during idle time. To reduce emission from machinery.	As and when needed	
		GHG emission	Air pollution	To educate drivers regarding the importance or reducing emission. To conduct regular maintenance. To ensure that machinery engine is turned off during idle time. To implement ESP for particle reduction.	As and when needed	
		Chemical spillage	Land pollution	To place metal tray to prevent spillage while doing the mixing activities.	Continuous.	

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Criterion / Indicator		Assessment Findings				Compliance
		Overflow of POME	Land and water pollution	To monitor and check the pond level on daily basis. To ensure system in proper order. To check bund and ensure all in functional condition.	Continuo us.	
		During the site visit conducted to the mill area, it was observed the mill area are in a good condition. The drivers have turned off their engine while waiting for their turn during a long que.				
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance -	Plan to mitigate negative impacts to promote positive impacts were guided in the environmental management plan. The plan was made available and verified. Samples of the plan is available as per indicator 4.5.1.2.				Complied
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	This is available as per item 4.5.1.2 above. All program for improvement are shown in the action plan column.				Complied
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives.	Series of awareness and training were conducted to the workers. 1. Training on LOTO, Chemical & Oil Spillages, 15.02.2021. 2. SCCS SOP & policy training, 04.02.2021.				Complied

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Criterion / Indicator		Assessment Findings	Compliance												
	- Major compliance -	3. SOP Training effluent treatment plant, 03.01.2020 4. Schedule waste management, 12.04.2021.													
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	The meeting discussing environmental issues were conducted together with the OSH meeting and on case basis. Latest meeting was conducted on 25.01.2021.	Complied												
Criterion 4.5.2: Efficiency of energy use and use of renewable energy															
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within 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 - Major compliance -	The monitoring is recorded in environment performance indicator. A monthly record on energy consumption for both renewable and non – renewable sources were also maintained. The following compiled data by the mill management to fulfil the requirement and monitoring purpose (from Jan 2020 until March 2021). <table border="1"> <thead> <tr> <th>Energy</th> <th>Ratio</th> <th>Target</th> </tr> </thead> <tbody> <tr> <td>Water</td> <td>1.51</td> <td>1.5</td> </tr> <tr> <td>Diesel</td> <td>0.2</td> <td>0.15</td> </tr> <tr> <td>Renewable Energy</td> <td>1.06</td> <td>1.5</td> </tr> </tbody> </table>	Energy	Ratio	Target	Water	1.51	1.5	Diesel	0.2	0.15	Renewable Energy	1.06	1.5	Complied
Energy	Ratio	Target													
Water	1.51	1.5													
Diesel	0.2	0.15													
Renewable Energy	1.06	1.5													
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.	The mill management has estimated the direct usage of non-renewable energy for their operation which is reflected in their annual budget. The annual budget was sighted and verified. Water supply budgeted at RM66,000 whilst electricity supply at RM660,000.	Complied												

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	Renewable energy used is from biofuel which are shell and fibre for boiler start up. Data of usage (for biofuel) is reflected in the table under indicator 4.5.2.1.	Complied
Criterion 4.5.3: Waste management and disposal			
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	The mill management has developed Waste Management Action Plan for 2021. They have listed the type of waste, item description and location. Sample of the plan as follow: a. Type of waste: schedule waste, domestic waste, industrial waste. b. Item description: use lubricant oil, oil filter, contaminated rags, rubbish, sewage. c. Location: workshop, laboratory, line site, effluent pond.	Complied
4.5.3.2	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. - Major compliance -	Identifying and monitoring source of waste and pollution is portrayed in the table under indicator 4.5.3.1. the table has explained the source and action plan to avoid and control the pollution. Fibre and shell are both by products produced by the mill and both are used at boiler station.	Complied
4.5.3.3	The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under	Sime Darby Plantation Berhad has developed Chemical Safety Management with the objective to define the requirement for the	Complied

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Criterion / Indicator		Assessment Findings	Compliance								
	Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005 - Major compliance -	procurement, transportation, receiving, handling, storage, disposal and training on the handling or use of chemicals. Schedule waste was disposed thru CLM Conservation (PG) Sdn Bhd. Latest schedule waste disposal was done on 13.07.2020 and first schedule waste generated was on 05.04.2021.									
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance -	Domestic waste disposed thru the Kulim Municipal landfill.	Complied								
Criterion 4.5.4: Reduction of pollution and emission											
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	The mill management has established an assessment on the polluting activities such as greenhouse gas emission, particulate & soot emissions, scheduled waste, solid waste and effluent under Energy Management Plan. <table border="1" data-bbox="1086 1013 1870 1388"> <thead> <tr> <th>Plan</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Energy</td> <td>To fully utilised turbine power to mill processing instead of using TNB supply.</td> </tr> <tr> <td>Preventive maintenance and educate workers on fuel savings practise.</td> </tr> <tr> <td>Recording data on the process GHG volume based on the potential source of gaseous.</td> </tr> <tr> <td>Diesel</td> <td>To ensure that the usage of backhoe is minimised and unnecessary usage is stopped.</td> </tr> </tbody> </table>	Plan	Action plan	Energy	To fully utilised turbine power to mill processing instead of using TNB supply.	Preventive maintenance and educate workers on fuel savings practise.	Recording data on the process GHG volume based on the potential source of gaseous.	Diesel	To ensure that the usage of backhoe is minimised and unnecessary usage is stopped.	Complied
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Diesel	To ensure that the usage of backhoe is minimised and unnecessary usage is stopped.										

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Criterion / Indicator		Assessment Findings								Compliance
			To stop usage of diesel engine while starting off the mill.							
		GHG reduction plan	To ensure backhoe engine is turned off when backhoe is not in use in a long time.							
			To stop usage of diesel engine for electricity instead to use steam turbine for electricity.							
			To ensure boiler chimney emission is within the allowable limit set by the DOE.							
		Effluent	Monitoring of POME application as per EPP.							
			Monthly submission of effluent sample to certified laboratory for specification.							
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	The mill management has submitted the effluent sample to the registered laboratory on monthly basis. The results are as follow:								Complied
		Date	Sample	pH	BOD	SS	TN	AN	O&G	
		14.01.21	Furrow	8.2	112	280	92	68	3	
		15.02.21	Furrow	7.1	66	270	183	172	2	
4.5.4.3	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.	The mill management takes the responsible in ensuring the POME release to the land irrigation is within the permissible limit as per guided by the Department of Environmental. According to the Compliance Schedule, permissible limit for POME release was 1440 cubic meter per day. POME release record is explained under indicator 4.5.5.2.								Complied

Criterion / Indicator		Assessment Findings	Compliance																																																					
- Major compliance -																																																								
Criterion 4.5.5: Natural water resources																																																								
4.5.5.1	<p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p>	<p>Water supply comes from Syarikat Air Darul Amain Sdn Bhd (SADA) and water catchment. The management has record and monitored the water consumption and usage.</p> <p>The mill management has conducted 2 analysis which are water and effluent in order monitor if there is any changes or impact to the environment due to the mill operation process.</p> <p>Water Sample Analysis (taken at Ulu Pasi & Taman Sungai Dingin)</p> <table border="1"> <thead> <tr> <th>Date</th> <th>pH</th> <th>BOD</th> <th>COD</th> <th>SS</th> <th>AN</th> <th>DO</th> <th>P</th> </tr> </thead> <tbody> <tr> <td rowspan="2">16.01.21</td> <td>6.1</td> <td>1</td> <td>40</td> <td>4</td> <td><1</td> <td>8.15</td> <td>ND</td> </tr> <tr> <td>6.1</td> <td>1</td> <td>32</td> <td>2</td> <td><1</td> <td>5.81</td> <td>ND</td> </tr> <tr> <td rowspan="2">11.02.21</td> <td>5.6</td> <td>5</td> <td>48</td> <td>2</td> <td><1</td> <td>5.95</td> <td>ND</td> </tr> <tr> <td>6.2</td> <td>4</td> <td>44</td> <td>10</td> <td><1</td> <td>4.94</td> <td>ND</td> </tr> <tr> <td rowspan="2">11.03.21</td> <td>6.3</td> <td>3</td> <td>72</td> <td>2</td> <td><1</td> <td>7.44</td> <td>ND</td> </tr> <tr> <td>6.4</td> <td>1</td> <td>32</td> <td>2</td> <td><1</td> <td>7.38</td> <td>ND</td> </tr> </tbody> </table> <p>Effluent sample result analysis is explained in the indicator 4.5.4.2.</p>	Date	pH	BOD	COD	SS	AN	DO	P	16.01.21	6.1	1	40	4	<1	8.15	ND	6.1	1	32	2	<1	5.81	ND	11.02.21	5.6	5	48	2	<1	5.95	ND	6.2	4	44	10	<1	4.94	ND	11.03.21	6.3	3	72	2	<1	7.44	ND	6.4	1	32	2	<1	7.38	ND	Complied
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	6.4	1	32	2	<1	7.38	ND																																																	
4.5.5.2	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.	The POME was discharged to the furrow system as per required in Compliance Schedule. Daily permissible limit for effluent release was 1440 m3 per day.	Complied																																																					

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Criterion / Indicator		Assessment Findings		Compliance
	- Major compliance -	Month, 2021	Release Rate (litre/month)	
		January	8436.10	
		February	13032.10	
		March	1415.40	
4.6 Principle 6: Best Practices				
Criterion 4.6.1: Mill Management				
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	The mill processing system is documented in the Sustainability Plantation Management System, doc no: MQMS/SQM/08 v 1 dated 01.11.2008 which include the Mill SOP, Mill Quality Management Manual. These documents provide guidelines and standards in the mill operations. The Standard Operation Procedure described details from the reception, sterilisation, threshing, pressing, clarification, effluent, laboratory workshop and etc.		Complied
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	The mill received regular visits from Plantation Advisory Department. Sighted a mill advisory report from the Mill Advisor, dated on 21 – 22.12.2020. Mill Advisory Report No: SOU1/SDM/02/2020 Mill Name SOU No: Sg Dingin Mill (SOU 1) Region: Northern Mill Manager: Subramaniam S/O Govindasamy Mill Advisor: Shahar Abd Kadir		Complied

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Criterion / Indicator		Assessment Findings					Compliance																																																																																			
		The objective was to improve and inspect the mill operation and to ensure the mill implement best practices.																																																																																								
Criterion 4.6.2: Economic and financial viability plan																																																																																										
4.6.2.1	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p>- Major compliance -</p>	<p>Business management plan is reflected in the budget 2021 and in the 5 years forecasted plan (2021 – 2025).</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="5">Budget Year</th> </tr> <tr> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Total FFB</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Estates</td> <td>233304</td> <td>225465</td> <td>227525</td> <td>238589</td> <td>251943</td> </tr> <tr> <td>Outside</td> <td>72000</td> <td>72000</td> <td>72000</td> <td>72000</td> <td>72000</td> </tr> <tr> <td>Total CPO</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Estates</td> <td>50953</td> <td>49444</td> <td>50101</td> <td>52728</td> <td>55906</td> </tr> <tr> <td>Outside</td> <td>15148</td> <td>15213</td> <td>15278</td> <td>15336</td> <td>15400</td> </tr> <tr> <td>Total PKO</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Estate</td> <td>13695</td> <td>13302</td> <td>13424</td> <td>14076</td> <td>14846</td> </tr> <tr> <td>Outside</td> <td>3600</td> <td>3600</td> <td>3600</td> <td>3600</td> <td>3600</td> </tr> <tr> <td>Total OER</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Estate</td> <td>21.84%</td> <td>21.93%</td> <td>22.02%</td> <td>22.10</td> <td>22.19</td> </tr> <tr> <td>Outside</td> <td>21.04%</td> <td>21.13%</td> <td>21.22%</td> <td>21.30</td> <td>21.39</td> </tr> </tbody> </table>						Budget Year					2021	2022	2023	2024	2025	Total FFB						Estates	233304	225465	227525	238589	251943	Outside	72000	72000	72000	72000	72000	Total CPO						Estates	50953	49444	50101	52728	55906	Outside	15148	15213	15278	15336	15400	Total PKO						Estate	13695	13302	13424	14076	14846	Outside	3600	3600	3600	3600	3600	Total OER						Estate	21.84%	21.93%	22.02%	22.10	22.19	Outside	21.04%	21.13%	21.22%	21.30	21.39	Complied
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Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Sg Dingin POM has received and processed FFB from owned supplying estates and diversion crops from outside crop producer. Sampled the letter of agreement as below: 1. Agreement No. P/P/1220/FFB02590L valid from 01/01/2021 to 31/12/2021 with Koperasi Peserta Peserta rancangan FELCRA Gugusan Sungai Malau Selama Kedah. 2. Agreement No. P/P/1220/FFB02591L valid from 01/01/2021 to 31/12/2021 with Genting Plantation Berhad (Ladang Bukit Sembilan) 3. Agreement No. P/P/1220/FFB02586L valid from 01/01/2021 to 31/12/2021 with Tang Tatt Trading Sdn Bhd. Pricing of the contract was stated in the LOA and acknowledged by the contractors.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Payment terms were clearly stated in the invoice issued by the contractors which is 30 days term. Verified the invoice submitted and payment records as below: 1. Agreement No. P/P/1220/FFB02590L valid from 01/01/2021 to 31/12/2021 with Koperasi Peserta Peserta rancangan FELCRA Gugusan Sungai Malau Selama Kedah. 2. Agreement No. P/P/1220/FFB02591L valid from 01/01/2021 to 31/12/2021 with Genting Plantation Berhad (Ladang Bukit Sembilan) 3. Agreement No. P/P/1220/FFB02586L valid from 01/01/2021 to 31/12/2021 with Tang Tatt Trading Sdn Bhd.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Besides, phone interviewed with contractors also confirmed that payment was made promptly and understanding term and condition in the LOA.	
Criterion 4.6.4: Contractor			
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	There is no permanent contractor hired by Mill. Sighted evidence of temporary contract with SS Naven Engineering dated 12/02/2021 for the period 11/02/2021 to 11/03/2021. Refer Contract Form No. 4300534035. The contractors engaged by the mill management has signed on a letter with subject RSPO/ ISCC/ MSPO/ SCCS dated 12/02/2021. Briefing of sustainability were given to contractors on 12/02/2021 during MOU of the agreement. Phone interviewed with the contractors confirmed that they were provided with training and have signed on the letter.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Mill has engaged temporary contractors for varieties of works such as maintenance work. Sampled the letter of award (LOA) for services provided as below: There is no permanent contractor hired by Mill. Sighted evidence of temporary contract with SS Naven Engineering dated 12/02/2021 for the period 11/02/2021 to 11/03/2021. Refer Contract Form No. 4300534035.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	The contractors have agreed, understood and acknowledged on the letter. Sampled of the letters for SS Naveen Engineering were sighted. Refer Contract Form No. 4300534035. Stated "All contractor to abide with RSPO and MSPO Requirement.	Complied

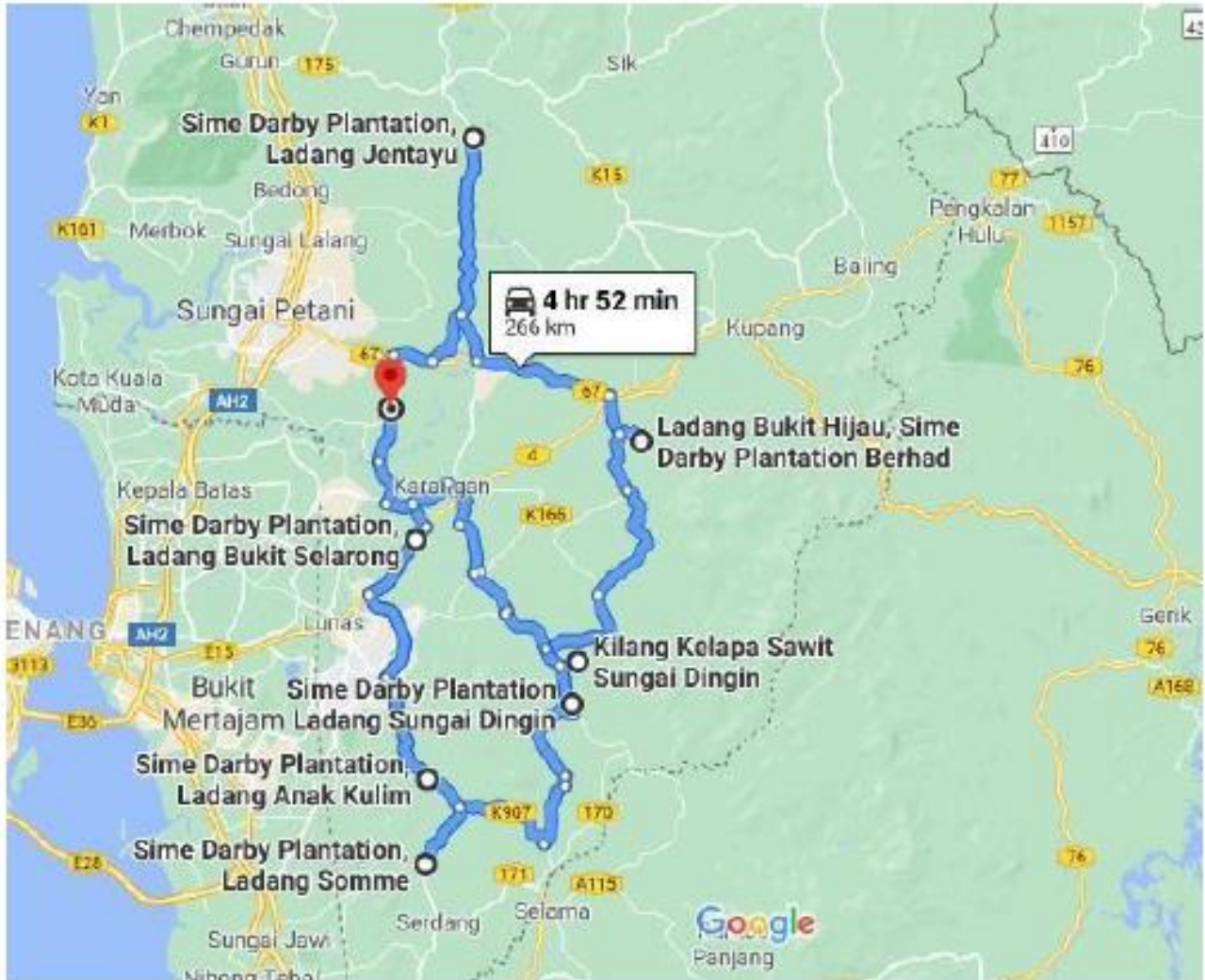
Appendix B: List of Stakeholders Contacted

Government Officer: Teacher at SK Bukit Selarong	Community/neighbouring village: Local communities Pengerusi JKKP
Suppliers/Contractors/Vendors: Contractors & Suppliers Mayang Bayumas Sdn Bhd Zaitunizan Binti Mahmud Husin	Worker's Representative/Gender Committee: Gender Committee Representatives Workers

Appendix C: Smallholder Member Details

Nil

Appendix D: Location and Field Map



Appendix E: 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